

Moraine Environmental, Inc.

Design • Engineer • Construct

April 17, 2013

Project Ref. # 5735

Theresa Evanson
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707

RECEIVED
APR 19 2013
Remediation &
Redevelopment

RE: Eligibility for the Dry Cleaner Environmental Response Fund (DERF)

**Quality Cleaners, Kuehl and Kuehl
1226 11th Avenue, Grafton, Wisconsin**

BRRTS # 0246560262
PID # 24666470

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APR 26
2013
PSC

Dear Terry,

I am writing to you on behalf of our clients, Gerald and Barb Kuehl, who are the owners of the Quality Cleaners business and property at the above referenced address. The Kuehls have operated a dry cleaning business at that location for the past 19 or 20 years. Prior to moving to the 1226 11th Avenue address, they operated their business at 1209 11th Avenue, also in Grafton.

The Kuehl's are now in their mid - 70's and due to declining dry cleaning sales and some health issues, have decided to close their business and sell their property. As part of the sale, Moraine performed an Environmental Transaction Screen Assessment of the property, which lead to a limited Phase II subsurface investigation. The Phase II investigation consisted of the advancement of one shallow boring in the interior of the building near the dry cleaning machine and the advancement of two borings to the rear of the loading dock at the building. Moraine identified perchloroethylene concentrations in the soil at levels requiring further sub-floor investigation and analysis. Based on our initial borings and our knowledge of shallow fractured bedrock in the Grafton area, we identified bedrock depths ranging from 5 feet to 6 feet below ground surface at the Quality Cleaners property. Our follow-up scoping investigation included the advancement of eight additional soil borings extending to bedrock beneath the building floor and two 20 foot deep bedrock wells to the rear (downgradient) of the property. It has been determined that approximately 600 tons of soil in an area beneath the concrete floor of the building are impacted. The groundwater to the rear of the building is impacted, with decreasing concentrations at the east property line.

The Kuel's have an interested potential buyer of the property. As you can imagine, the prospective buyer of the property is very concerned about the soil and groundwater impacts and the funding of the site cleanup.

During the operation of the dry cleaning business, the Kuehl's did not observe any leaks, releases or loss of perchloroethylene product. There was no reason to suspect that there was a release of dry cleaning solvent, which caused the recent

identification of impacted soil and groundwater at the site. For these reasons, Quality Cleaners did not conduct any previous subsurface investigation or access the DERF fund in any way.

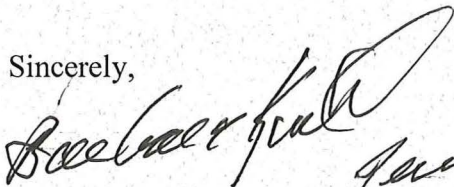
Moraine understands from discussions with Sarah Bradley that because the Kuehl's did not perform a limited subsurface investigation prior to August 30, 2008, that they may not be eligible for reimbursement of site investigation or remediation costs from DERF. As a licensed dry cleaner, the Kuehl's paid an amount of \$23,654.56 into the DERF fund beginning in the last quarter of 1997 through the first quarter of 2013. That amount of money is a considerable outlay of cash from a small business, which was in decline in the later years. On behalf of Jerry and Barb Kuehl, would the Department of Natural Resources please consider their eligibility for the DERF program? It is likely that Barb and Jerry Kuehl will lose their buyer... and without the income from the property sale, it is unlikely that they can proceed, unless they can find another buyer.

If the Kuehl's are determined not to be eligible for DERF, are there any other brownfield funds or grants for which they qualify?

I have attached the details from our subsurface scoping investigation to date, to provide a more technical overview of the problem. Obviously, additional groundwater monitoring wells and piezometers will be required to further assess the vertical and horizontal extent of contamination.

Thank you for your consideration.

Sincerely,



Barb Kuehl



Jerry Kuehl



Tom Sweet

Moraine Environmental, Inc.

Enclosures

Cc: Sarah Bradley, WDNR