



July 22, 2013

Gerald Kuehl
5350 Cascade Dr.
West Bend, WI 53095

Dear Mr. Kuel:

Subject: Work needed for Quality Cleaners, 1226 11th Avenue, Grafton, file reference FID #246166470, BRRTS #0246560212.

Thank you for your call to inquire as to what work needs to be done to get this case into compliance. I have looked in your file to make that determination. Although your consultant is in a better position to determine what work needs to be done, at your request, I recommend the following minimum work to (hopefully) complete the site investigation phase of the project: Note that it is common that additional site investigation serves to illustrate where subsequent round(s) of site investigation needs to be conducted. If contamination is fairly minimal beyond what is known already, only one additional investigation may be required.

- Six to nine additional soil borings with two soil samples from each boring to determine the full extent of contamination. Soil should be tested for VOCs.
- Two sub-slab vapor samples tested for CVOCs. Also conduct a vapor intrusion analysis on the surrounding buildings after you get the results.
- Install a minimum of two additional wells and a piezometer to determine the extent of groundwater contamination. Run water samples for VOCs.

Remedial action options should be evaluated after the site investigation is complete. I favor excavating as much of the worst of the contaminated soil out from under the floor slab, if possible, then disposing that under the contained-out rule. If the contained-out rule does not apply, I am in favor of treating that soil in a "tank" onsite to concentrations that would allow for non-hazardous disposal. A venting system could then be evaluated for remediation of residual soil under the slab.

It is typical that the department will require a minimum of two years of quarterly groundwater monitoring after the active soil remedial action phase is complete, in order to determine its effectiveness on the groundwater. In some cases, active groundwater remediation is appropriate.

If you have any questions about this letter, please call me at 920-892-8765 extension 3023.

Sincerely

John Feeney
Wisconsin Department of Natural Resources
Cc: Moraine Environmental, SER File