



August 24, 2020

MR ALLIN WALKER AND MS MARGARET LOCKWOOD
6746 CTH G
EGG HARBOR WI 54209

Subject: Change of Project Manager Notification
Sturgeon Bay Launderers & Cleaners (Former) 7 S. 2nd Ave, Sturgeon Bay, WI
BRRTS Activity #: 02-15-576022

Dear Mr. Walker and Ms. Lockwood,

The Wisconsin Department of Natural Resources (DNR) is informing you of a change in project manager for the Sturgeon Bay Launderers & Cleaners site, your new project manager is Karen Campoli. As the new project manager, I reviewed the entire file and have provided general comments on completing the site investigation.

On March 4, 2019, the DNR reviewed the Site Investigation Report submitted by your consultant, Chad Fradette of Evergreen Consultants, LLC. Discussions between the consultant and the DNR are ongoing concerning the required steps needed and additional work required in order to prepare the site for closure. A Site Investigation Work Plan (SIWP) has been requested prior to any future work, as stated in Wis. Admin. Code ch. NR 716, and should at a minimum address the vapor intrusion risk to the adjacent building, further define the nature and extent of soil contamination to the north and to the east, and propose a plan for the soil contamination left in place.

In the most recent NR 700.11 Status Report, it was stated that a closure request package is currently under review; however, as previously discussed with the DNR in October 2019, this site is not ready for closure at this time.

The following issues need to be addressed prior to submitting a closure request:

1. The vapor intrusion risk of the southwest adjacent building needs to be investigated. Since CVOCs exceedances exist in soils within 100 feet of the adjacent building, the vapor intrusion risk needs to be assessed. I understand the financial situation of the RP, therefore, I recommend conducting a preliminary risk assessment on the adjacent property to determine if vapor intrusion needs to be addressed immediately or if this can be handled later in the investigation process. I recommend reaching out to the adjacent property owner to determine the building use, demographics and construction (e.g., slab-on-grade vs. basement, sumps, residential vs. commercial, etc.). Based on these findings, we can determine the risk level for vapor intrusion and can provide guidance for sampling and/or further investigation.
2. A Site Investigation Work Plan (SIWP) as required in NR 716 needs to be submitted prior to any further work at this site. You can submit the SIWP for review without a fee. The DNR will then review the SIWP and provide general guidance to ensure the work plan will cover the necessary issues required to work towards closure. Once the SIWP has been review/30 days after submission, work shall be started within 90 days.
3. The nature and extent of contamination needs to be addressed toward Michigan Street. I understand there is a concern about damaging and replacing sidewalks. As previously mentioned, it is possible that

we could negotiate the sidewalk issue with the City. The SIWP should include soil delineation towards Michigan Street. SW-1 has a soil to groundwater exceedance for PCE which also needs to be delineated.

4. The nature and extent of contamination needs to be addressed to the east, between/beyond SB-2 (under the current site building) and beyond GP-13.
5. Plans are needed to address the contamination left in place near SB-11, SB-12, SB-13, and beneath the building, and in other areas where soil will be left in place. This will likely be in the form of a maintenance plan and outlined in the SIWP.
6. According to NR 712, a hydrogeologist needs to review and provide signature for any/all investigation involving groundwater. Any further groundwater investigation needs to be reviewed by a hydrogeologist.
7. The definition of existing structural impediments needs to be provided within the SIWP. If other adjacent properties are affected, a notification letter needs to be sent to the affected property owners.
8. Further helpful information for advancing toward closure and updating the March 2019 SIR includes;
 - providing boring logs from all the borings;
 - more than one groundwater sample (GP-1 is upgradient and therefore not helpful in defining the groundwater contamination on site or potentially offsite);
 - corrected cross-section (MW-6 appears beneath the adjacent building which is incorrect);
 - GP-12 is incorrectly marked as clean – the GW pathway RCL is exceeded at this sample location;
 - sidewall confirmation samples should be shown/taken on the excavation limit or outside of the excavation area.

Please provide a work plan within the next 60 days, by October 23, 2020, to address these issues. Feel free to reach out to discuss the vapor intrusion risk after you have gathered the necessary information from the adjacent building, the DNR can help to provide guidance on this issue. Again, it is strongly advised you submit a work plan (as required by statute) prior to doing any further work on the site to ensure you are addressing the issues listed above. Providing a work plan allows the DNR to provide guidance or any additional work needed to avoid additional mobilization or unnecessary work.

The SIWP may be submitted for review without a fee. Further guidance or approval will be issued within 30 days of the SIWP submission. Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the SIWP and sampling results must be sent to the DNR and property owner(s), including owners of off-site properties from which samples have been collected, within 10 days of receipt.

All future correspondence should be directed to:

Wisconsin Department of Natural Resources
Attn: Karen Campoli
2984 Shawano Ave
Green Bay, WI 54313-6727

If you have any questions, please contact me at (920) 510-4349 or email me at karen.campoli@wisconsin.gov.
I look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Karen Campoli".

Karen Campoli
Hydrogeologist
Remediation & Redevelopment Program

cc: Chad Fradette, Evergreen Consultants LLC (chad@evergreenwis.com)