



December 10, 2019

E. David Locke
FH of McFarland Inc.
5990 Highway 51
McFarland WI 53558

Chad Beyler, Registered Agent
Best Way Cleaners LLC
5472 Alan Drive
Oregon WI 53575

Subject: Case Closure Not Recommended
Best Way Cleaners, McFarland, Wisconsin
DNR BRRTS Activity # 02-13-583171

Dear Sirs:

On December 5, 2019, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for Best Way Cleaners. DNR reviews cleanup cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and to determine if a threat to public health, safety or welfare or the environment exists, per Wis. Admin. Code § NR 726.13(2)(b).

As noted in a DNR voice mail message left with your consultant on December 6, 2019, case closure is not recommended because additional requirements must be met. This letter explains the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide your written response regarding the remaining work and a schedule for completion.

Need to Define the Degree and Extent of Contamination

Additional soil, groundwater, and vapor sampling are needed to define the degree and extent of contamination as required by § NR 716.11.

Source Area and Groundwater Evaluation

Additional investigation of soil and groundwater is needed to better evaluate the extent of contamination and locate the source area. Vapor samples contain tetrachloroethene (PCE) and trichloroethene (TCE), but B-5 soil and groundwater samples contain very little of these compounds. It seems likely, therefore, that B-5 does not intersect the source area below the slab.

A cursory review of information from nearby sites suggests the surface water body south of Severson Street may influence the groundwater flow direction, meaning groundwater flow at Best Way cleaners could have a southwesterly component. DNR recommends your consultant discuss with the DNR project

manager sampling strategies that address the resulting data gaps.

Need to Complete a Vapor Investigation

Additional investigation, per § NR 716.11(5), is needed to determine whether vapor intrusion is a completed pathway, or if there is a risk of future vapor exposure due to contamination. Sub-slab vapor levels often differ significantly from sampling points in different locations of the same site, and at this site the source has yet to be identified. An additional sub-slab vapor sampling point needs to be installed toward the front (eastern portion) of the Best Way Cleaners unit. If not already completed, a pressure field test of the existing mitigation system is needed to determine its effectiveness.

The shopping center units adjacent to Best Way Cleaners need to have additional rounds of sub-slab sampling. One sample per location is not sufficient to evaluate potential vapor intrusion risk.

Need to Conduct A Remedial Action

Section NR 726.05(8) states that sites with vapor contamination are not eligible for closure until the vapor exposure pathway has been investigated and, where a vapor risk screening level was exceeded, remediated and the vapor exposure pathway interrupted. Sub-slab depressurization is a mitigation technique and not a remedial action. Plan ahead to address this requirement as soon as the site investigation is completed.

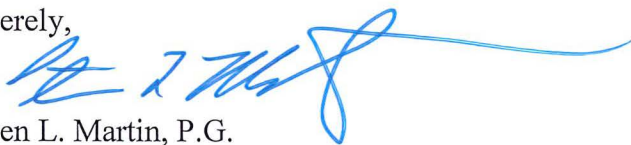
Schedule

Within 60 days of the date of this letter, submit a supplemental work plan, including a schedule, to meet the requirements of § NR 716.09(1). The additional work needs to begin with beginning of additional work within 90 days of work plan submittal (or 60 days of DNR approval if you choose to send in a request for written approval with the applicable review fee). When submitting the supplemental investigation workplan, include a map showing all underground utilities, surface water features, and other features required in § NR 716.15(2)(c)6.

Conclusion

If you have questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Cindy Koepke at 608-275-3257 or cynthia.koepke@wisconsin.gov. For detailed information on the closure reconsideration process, please see DNR publication, RR-102, "Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process" by visiting dnr.wi.gov, search: RR-102, for more information.

Sincerely,



Steven L. Martin, P.G.
South Central Team Supervisor
Remediation & Redevelopment Program

cc: Robyn Seymour – Seymour Environmental