VIEAU ASSOCIATES
a Division of GZA

October 13, 2021

John Hunt
Hydrogeologist – Remediation and Redevelopment
Wisconsin Department of Natural Resources
223 East Steinfest Road
Antigo, Wisconsin 54409

RE: Request for "No Action Required"
Cortec Spray Technologies
1300 South River Street
Spooner, WI 54801
Vieau Project Number 28.0240651.00

Dear Mr. Hunt:

Vieau Associates, Inc. a division of GZA GeoEnvironmental (Vieau Associates) is graciously requesting "No Further Action" status based on the the findings of our recent *Phase II Investigation* and follow-up *Soil Vapor Investigation* at Cortec Spray Technologies located at 1300 South River Street (subject property). The documents that are being submitted for your review associated with this request include the following:

- *Phase I Environmental Site Assessment* dated June 29, 2021 prepared by Vieau Associates for U.S. Bank N.A.
- *Phase II Investigation* dated September 2, 2021 prepared by Vieau Associates for Miksic Realty, LLC
- *Soil Vapor Investigation* dated October 12, 2021 prepared by Vieau Associates for Miksic Realty, LLC

<u>Phase I Environmental Assessment</u>

Vieau Associates completed a Phase I Environmental Site Assessment (ESA) for the subject property which identified the following *recognized environmental condition* (REC):

- Government records indicate that former occupants of the property qualified as RCRA Large Quantity Generators (LQG) of hazardous waste during the 1990s and early-2000s prior to the status being downgraded in 2007 to RCRA small-quantity status. Hazardous wastes generated included ignitable wastes, halogenated solvents (including trichloroethene), and non-halogenated solvents associated with spray product manufacturing. The generators identified on the listing include Filltec Inc, Rawn Co Inc, and Cortec. Based on interviews with Cortec personnel, no chlorinated solvent wastes are currently generated. Multiple violations of the hazardous waste generator permit were identified in the government database report; however, files were not provided by the date of this report. While a limited

investigation was completed on the property in 2008 and no significant hazardous substances were detected, there has been no groundwater sampling since the late 1990s. Based on the foregoing, we view the use and generation of VOCs on the subject property as evidence of a *recognized environmental condition*.

Based on the assessment findings, Vieau Associates recommended soil, groundwater, and soil vapor sampling to evaluate the property for impacts related to the historical use of the property.

Phase II Investigation

The Phase II Investigation included the advancement of three soil probes, two radial vapor probes, and two sub-slab soil vapor points. Soil and groundwater samples were collected from each soil probe and submitted to a fixed-base laboratory for analysis of volatile organic compounds (VOCs). Radial vapor and soil vapor samples were also collected and submitted for laboratory analysis of VOCs.

The Phase II Investigation concluded the following:

- Soil and groundwater samples were collected from three probes advanced throughout the property and submitted for analysis of VOCs. No VOCs were detected above laboratory reporting limits in any of the soil or groundwater samples analyzed.

- Chloroform was detected in VP-2 at a concentration of 571 µg/m3, exceeding its respective VRSL of 53.3 µg/m3. Carbon tetrachloride was also identified in VP-2 at a concentration of 1,830 µg/m3, exceeding its respective VAL of 20.4 µg/m3, but less than its VRSL of 2,040 µg/m3. The detection of chloroform at a concentration exceeding its respective VRSL indicates the presence of an elevated vapor intrusion (VI) risk to the indoor air of the onsite building. We view the identified elevated concentrations of hazardous substances in sub-slab soil vapor as a recognized environmental condition.

Based on these results, we recommended additional sub-slab soil vapor testing in the vicinity of the identified impacts to confirm/refute this round of sampling and/or delineate the lateral extents of impacts.

Soil Vapor Investigation

The follow-up Soil Vapor Investigation included the collection of five (5) additional sub-slab vapor samples. The samples were collected in the vicinity of the previously-identified Chloroform and Carbon Tetrachloride impacts to soil vapor. Sample location VP-3 was situated in the "center" of the identified impacts (i.e., closest to the approximate location of VP-2 collected during the August 2021 Ph-II Investigation). The remaining 4 sub-slab soil vapor samples were collected approximately 20 feet to the north (VP-5), south (VP-7), east (VP-4), and west (VP-6) of sampling location VP-3.

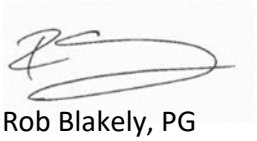
In summary, several petroleum and non-petroleum VOCs were detected in each of the five soil vapor samples analyzed. However, no VOCs were identified above their respective VALs or VRSLs.

Summary and Conclusions

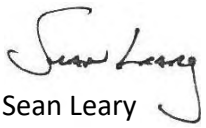
Based on the results of the Soil Vapor Investigation, along with the lack of identified impacts to soil, groundwater, and radial soil vapor in samples collected during the Phase II Investigation, we are requesting a "No Action Required" status be granted to the previously-identified hazardous substance impacts to soil vapor.

Please contact the undersigned if there are any questions regarding this transmittal.

Sincerely,
Vieau Associates, a Division of GZA GeoEnvironmental, Inc.



Rob Blakely, PG
Project Manager



Sean Leary
Associate Principal, VP