



April 16, 2021

DAVID EARLE
CRANKY PATS PROPERTIES LLC
905 S COMMERCIAL ST
NEENAH WI 54956

SUBJECT: Air & Sump Water Sampling Results for 905 South Commercial Street –
Contaminants Detected Above DNR Action Levels
DNR Site Name: Donaldson's One Hour Cleaners (Former), 110 West Cecil St., Neenah, WI
DNR BRRTS # 02-71-110797

Dear Mr. Earle,

Included are the findings of a recent investigation on your property by the Department of Natural Resources (DNR). This letter is a follow-up to our phone conversation on April 15, 2021.

Summary

Three chemicals associated with dry cleaners were detected in indoor air in the basement at levels that do not pose a health risk to building occupants. However, two of these chemicals were detected within the air space of the open sump in the basement above their respective action levels. The water in the sump was also found to be impacted below drinking water standards. Sealing and venting of the sump and appropriate disposal of the sump water is necessary.

During this sampling event, chemicals were detected adjacent to and beneath the foundation at levels below the screening levels. As stated in the December 8, 2020 letter, chemicals were previously detected outside the foundation at levels that need to be mitigated and possibly routinely monitored until a cleanup is performed.

Sampling Effort

As you are aware, this investigation was conducted because of the potential for chemical vapors from the nearby Donaldson's One Hour Cleaners (Former) site, identified above, to migrate through soil and groundwater, accumulate next to and/or beneath the foundation of your building, and possibly enter the indoor air. The contaminant of concern at the Donaldson's One Hour Cleaners (Former) site is the chlorinated volatile organic compound, tetrachloroethylene ("PCE"). The history of this site and the potential concerns to neighboring residents were historically described to you and, most recently, in emails dated August 6, 2020 and August 13, 2020.

Between February 9 and February 19, 2021, an environmental consultant hired by DNR collected soil vapor samples as well as indoor air samples, including air within the open sump in the basement, and an outdoor air sample. The samples were then submitted to ALS Environmental or Beacon Environmental, where they underwent laboratory analysis for PCE, and the related chemical breakdown products trichloroethylene ("TCE"), cis-1,2-dichloroethylene ("cis-1,2-DCE"), trans-1,2-DCE and vinyl chloride.

As part of this sampling effort, the water within the recently discovered sump in the basement was also sampled on February 18, 2021. The sample was submitted to Synergy Environmental, where it underwent laboratory analysis for

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volatile organic compounds (VOCs), including the chemicals of concern: PCE, TCE, cis-1,2-DCE, trans-1,2-DCE and vinyl chloride.

Test Results

Enclosed are two tables titled *Air Data for Chemicals Sampled at Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI* for the outdoor air / indoor air (including the sump air sample) and sub-slab or side-wall vapor (i.e., outside the foundation) samples. Although PCE, TCE and cis-1,2-DCE were detected in air in the basement, the levels at which they were detected are such that they do not pose a health risk to you or your employees. This is called "a detection below screening level" and is explained in the enclosed fact sheet.

However, the analysis of the air within the open sump detected PCE and TCE above the action levels for indoor air. The DNR action levels for PCE and TCE are set to provide a threshold concentration that is protective of human health over long-term exposure. It is the experience of DNR and DHS in investigating similar cases at other locations in the state that the potential health risk for you and your employees in this particular sump scenario is low. The vapor levels measured in the sump air at your business present a long-term risk, not an immediate one, to you and your employees of the building with the exception of women who are or may become pregnant. This is because TCE can have serious effects on the developing fetus, even at low levels. If work is to be completed on the sump or the lid must be removed at any time, women who are or may become pregnant should be advised not to enter the basement during this time.

Even though the potential health risks are low, you may have questions about how breathing these vapors may affect your health or the health of your workers. Please direct any health-related questions to Doug Gieryn, Winnebago County Health, at (920) 232-3029 or Amanda Koch, Department of Health Services, at (608) 267-2487.

A third table titled *Sump Water Data for Chemicals Sampled at Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI* for the sump water sample is also enclosed. PCE and cis-1,2-DCE were minimally detected in the water. However, two other contaminants were also detected: bromodichloromethane and chloroform. Chloroform was detected above the Preventive Action Limit but below the Enforcement Standard. The public health groundwater quality standards for all these chemicals are listed in § NR 140.10, Wis. Admin. Code. The presence of PCE, cis-1,2-DCE, bromodichloromethane and chloroform together are indicative of a discharge from a sanitary sewer line where dry cleaner chemicals were also released. Water from the sump will need to be properly disposed in the future and must be accounted for during modifications to seal and properly vent the sump.

Next Steps

Under typical circumstances, the party responsible for the contamination would be directed to move forward with installing a vapor mitigation system at your business and perform an environmental cleanup action. However, there is currently a dispute regarding responsibility for this contamination.

DNR discussed the data with the Winnebago County Health Department ("County Health") and Department of Health Services (DHS). We jointly recommend the following actions:

- Seal and properly vent the sump utilizing a licensed plumber which will include the need to appropriately dispose of sump water (additional plumbing and permitting may be required).
- Maintain communications with you, DNR, County Health and DHS.

The DNR must first notify the party responsible for the contamination of their obligation under Wis. Admin. Code ch. NR 708 to mitigate this preferential pathway. Depending on their response, DNR may need to consider additional actions.

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Thank you for your continued patience and cooperation at this complicated site. Please contact me if you have questions regarding the environmental investigation or need an update on our progress. As stated above, please direct any health-related questions to Doug Gieryn, Winnebago County Health, at (920) 232-3029 or Amanda Koch, Department of Health Services, at (608) 267-2487.

Sincerely,



Jennifer Borski

Hydrogeologist

Remediation & Redevelopment Program

920-360-0853

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Encl. Air Data (Outdoor & Indoor) for Chemicals Sampled at Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI
Air Data (Sub-Slab Vapor) for Chemicals Sampled at Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI
Sump Water Data for Chemicals Sampled at Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI
Understanding Chemical Vapor Testing Results, RR-977

Copy: David Earle, Cranky Pat's, david@crankypats.com
Doug Gieryn, Winnebago County Health, dgieryn@co.winnebago.wi.us
Amanda Koch, DHS, Amanda.koch@dhs.wi.gov

**Air Data (Outdoor and Indoor) for Chemicals Sampled at
Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI**

DNR Site Name: Donaldson's One Hour Cleaners, 110 W. Cecil St., Neenah, WI
BRRTS # 02-71-110797

(All data units in µg/m ³)	Air concentrations on 11/10/2020 (8-hr test/TO-15)	Air concentrations on 2/18/2021 (9-day test/TO-17)	Air concentrations on 2/19/2021 (grab test/TO-15)	Comparison Vapor Action Level (Commercial)
Contaminant				
Outdoor Air				
PCE	No Detect	No Detect	Not Sampled	180
TCE	No Detect	No Detect	Not Sampled	8.8
cis-1,2-DCE	No Detect	No Detect	Not Sampled	No VAL (806,000 OSHA)
trans-1,2-DCE	No Detect	No Detect	Not Sampled	No VAL (790 ATSDR; 806,000 OSHA)
Indoor Air - 1A (Bar Area)				
PCE	No Detect	Not Sampled	Not Sampled	180
TCE	No Detect	Not Sampled	Not Sampled	8.8
cis-1,2-DCE	No Detect	Not Sampled	Not Sampled	No VAL (806,000 OSHA)
trans-1,2-DCE	No Detect	Not Sampled	Not Sampled	No VAL (790 ATSDR; 806,000 OSHA)
Indoor Air - 1B (Dining Area)				
PCE	No Detect	Not Sampled	Not Sampled	180
TCE	No Detect	Not Sampled	Not Sampled	8.8
cis-1,2-DCE	No Detect	Not Sampled	Not Sampled	No VAL (806,000 OSHA)
trans-1,2-DCE	No Detect	Not Sampled	Not Sampled	No VAL (790 ATSDR; 806,000 OSHA)
Indoor Air - Basement				
PCE	5.36	7.46	Not Sampled	180
TCE	No Detect	0.597	Not Sampled	8.8
cis-1,2-DCE	No Detect	0.993	Not Sampled	No VAL (806,000 OSHA)
trans-1,2-DCE	No Detect	No Detect	Not Sampled	No VAL (790 ATSDR; 806,000 OSHA)
Indoor Air - Sealed Sump				
PCE	Not Sampled	Not Sampled	331	180
TCE	Not Sampled	Not Sampled	20.3	8.8
cis-1,2-DCE	Not Sampled	Not Sampled	28.3	No VAL (806,000 OSHA)
trans-1,2-DCE	Not Sampled	Not Sampled	No Detect	No VAL (790 ATSDR; 806,000 OSHA)

Notes:

Below Vapor Action Level

Detect above Vapor Action Level (bolded)

ATSDR = Agency for Toxic Substances and Disease Registry

cis-1,2-DCE = cis-1,2-dichloroethylene

OSHA = Occupational Safety and Health Administration

PCE = Tetrachloroethylene

TCE = Trichloroethylene

trans-1,2-DCE = trans-1,2-dichloroethylene

VAL = Vapor Action Level

µg/m³ = micrograms per cubic meter

**Air Data (Sub-Slab Vapor) for Chemicals Sampled at
Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI**

DNR Site Name: Donaldson's One Hour Cleaners, 110 W. Cecil St., Neenah, WI
BRRTS # 02-71-110797

(All data units in µg/m ³)	Air concentrations on 11/10/2020	Air concentrations on 2/19/2021	Comparison Vapor Risk Screening Level (Small Commercial)
Contaminant			
SSV-1 (Under Bar)			
PCE	104	Not Sampled	6,000
TCE	2.15	Not Sampled	290
cis-1,2-DCE	No Detect	Not Sampled	No VRSL (27,000,000 OSHA)
trans-1,2-DCE	No Detect	Not Sampled	No VRSL (26,000 ATSDR; 27,000,000 OSHA)
SSV-Baseament			
PCE	1,930	504	6,000
TCE	69.2	30.8	290
cis-1,2-DCE	19.2	No Detect	No VRSL (27,000,000 OSHA)
trans-1,2-DCE	No Detect	No Detect	No VRSL (26,000 ATSDR; 27,000,000 OSHA)
SSV-West Wall (4 ft bgs)			
PCE	23,000	414	6,000
TCE	1,310	43.3	290
cis-1,2-DCE	846	No Detect	No VRSL (27,000,000 OSHA)
trans-1,2-DCE	32.5	No Detect	No VRSL (26,000 ATSDR; 27,000,000 OSHA)

Notes:

Below Vapor Risk Screening Level

Detect above Vapor Risk Screening Level (bolded)

ATSDR = Agency for Toxic Substances and Disease Registry

cis-1,2-DCE = cis-1,2-dichloroethylene

ft bgs = feet below ground surface

OSHA = Occupational Safety and Health Administration

PCE = Tetrachloroethylene

SSV = Sub-slab vapor

TCE = Trichloroethylene

trans-1,2-DCE = trans-1,2-dichloroethylene

VRSL = Vapor Risk Screening Level for sub-slab vapor

µg/m³ = micrograms per cubic meter

Sump Water Data for Chemicals Sampled at

Cranky Pat's Pizza, 905 S. Commercial St., Neenah, WI

DNR Site Name: Donaldson's One Hour Cleaners, 110 W. Cecil St., Neenah, WI

BRRTS # 02-71-110797

(All data units in µg/L)	Sump water concentrations on 2/18/2021	Comparison Enforcement Standard	Comparison Preventive Action Limit
Contaminant			
PCE	1.04 "J"	5	0.5
TCE	No Detect	5	0.5
cis-1,2-DCE	0.43 "J"	70	7
trans-1,2-DCE	No Detect	100	20
Bromodichloromethane	1.07 "J"	0.6	0.06
Chloroform	4.5	6	0.6

Notes:

Below Preventive Action Limit

Detect above Preventive Action Limit (bolded)

cis-1,2-DCE = cis-1,2-dichloroethylene

PCE = Tetrachloroethylene

TCE = Trichloroethylene

trans-1,2-DCE = trans-1,2-dichloroethylene

µg/L = micrograms per Liter

"J" = detect not statistically valid



Understanding Chemical Vapor Intrusion Testing Results

RR-977

October 2014

From the Lab to You

Chemical vapor samples were taken from underneath your house or building and possibly indoors as well. These samples have been tested by a certified laboratory and a report was issued. The Wisconsin Department of Natural Resources (DNR) uses these test results to determine if people in the building are being exposed to chemical vapors coming from nearby contaminated soil or groundwater, and to decide what, if any, action is needed to prevent this exposure.

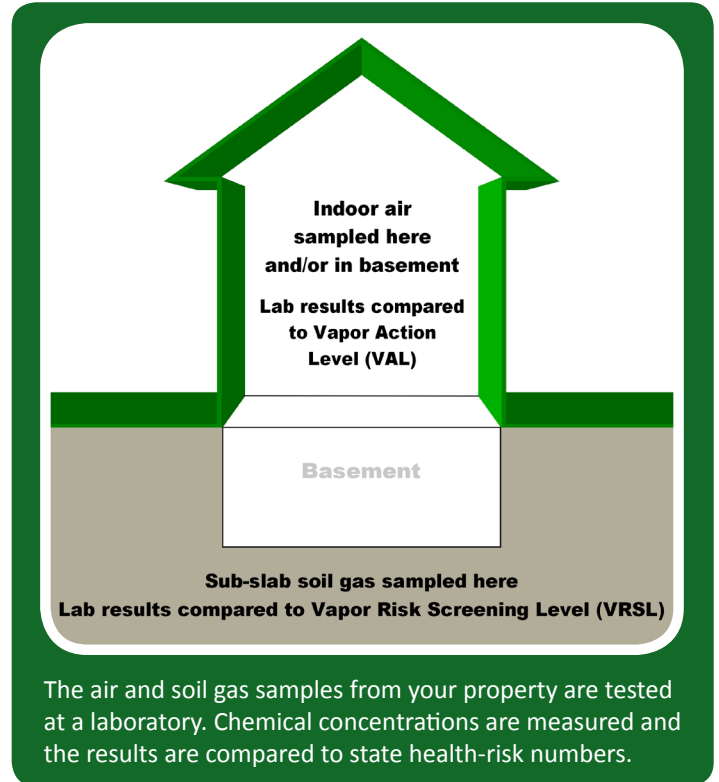
Indoor Air Testing Results

If indoor air samples were collected in your house or building, test results from the lab will be compared to the state Vapor Action Level (VAL) for chemicals of concern. The VAL is a chemical compound's numerical value that represents a health hazard risk to no more than 1 in 100,000 people during a lifetime of exposure. If test results show chemical concentrations in your air below the VAL then adverse health effects are extremely rare, even if you were to breathe the chemical at this concentration for your entire life.

Test results showing chemical concentrations in the air at or above the VAL prompt DNR to recommend that exposure to these chemical vapors be reduced. If test results show concentrations significantly above the VAL, or more than one type of chemical vapor is identified in your indoor air, the risk from exposure increases. If the concentration of any indoor chemical vapor greatly exceeds the VAL, DNR is concerned about even short-term exposure and will typically require immediate action to address the problem.

The VAL for each chemical is set by scientific research. It is protective of all people, including those who are most susceptible to adverse health effects.

If test results identify chemicals in your air that are not present in nearby soil or groundwater contamination, it is likely that these vapors are coming from some product or activity in or near your house or building. Many everyday consumer products (e.g., cleaners, solvents, polish, adhesives, lubricants, aerosols, insect repellants, etc.); combustion processes (e.g., smoking, home heating); fuels in attached garages; dry cleaned clothing or draperies; and occupant activities (e.g., craft hobbies), also release chemical vapors into the air.



Sub-slab Soil Gas Testing Results

Soil gas samples were collected from the ground beneath the concrete slab of your building foundation or basement. The lab measured the concentrations of various chemicals in these samples. DNR compares these measurements to the state Vapor Risk Screening Level (VRSL), which identifies the concentration of a chemical in soil gas that scientific research suggests can be a health risk if vapor enters a building. If soil gas measurements exceed the VRSL for a chemical of concern, action to reduce exposure is strongly recommended.

The VRSL is a higher number (higher chemical concentration) than the VAL because it is presumed that concrete building foundations and basement walls will prevent most soil gas from entering a building. Further, any soil gas that does enter a building through cracks, holes, sump pumps, drains, etc., will be diluted to some extent by the indoor air. So, people inside will not be breathing air that includes the full concentration of chemical vapors that exist in the ground.



Wisconsin Department of Natural Resources
P.O. Box 7921, Madison, WI 53707
dnr.wi.gov, search "Brownfields"



DNR generally relies on the test results of the sub-slab soil gas samples when determining what, if any, action should be taken related to chemical vapors coming from nearby soil or groundwater contamination. Indoor air quality is highly variable, and it is difficult to make a definitive decision about vapor intrusion based on indoor air sampling alone.

Follow-Up Actions

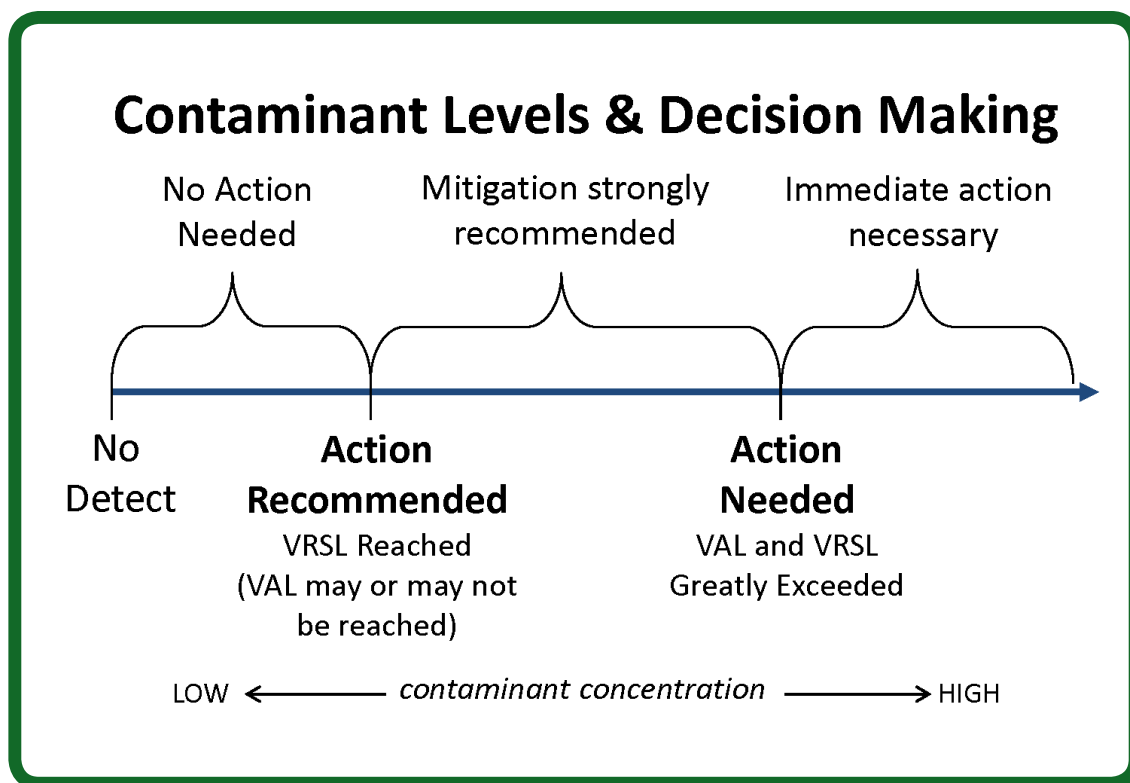
If your test results are less than a VAL for indoor air, or a VRSL for sub-slab soil gas, then the air in the house or building should not present a health concern. Follow-up sampling and testing may be necessary to confirm the results, but no other action is typically suggested.

When test results show soil gas chemical concentrations above a VRSL, both DNR and the Wisconsin Department of

Health Services recommend that owners take action to reduce potential exposure. This typically involves installing a vapor mitigation system that vents chemical vapors from beneath your home or building to the outdoors, similar to a radon mitigation system.

If indoor air concentrations exceed a VAL, but sub-slab concentrations are less than a VRSL, then the chemical vapors are most likely coming from indoor sources. Steps should be taken by the house or building owner to identify the products and practices causing the problem and implement appropriate remedies.

If soil gas mitigation is recommended, a representative of the party who is responsible for the soil or groundwater contamination will contact you to discuss your options.



A Note about Measurement Units: The lab report may include some unfamiliar technical language. The most important point to note is whether or not the test result for a specific chemical exceeds a VAL or VRSL, which are also sometimes referred to, generically, as “screening levels.”

The concentration of gaseous pollutants in air is typically described in two different ways: 1) as units of mass per volume, where $\mu\text{g}/\text{m}^3$ represents micrograms of gaseous pollutant per cubic meter of ambient air; and 2) as parts per billion by volume (ppbv), where the volume of a gaseous pollutant is compared to a set volume of ambient air. These are the numbers that are compared to the VAL and VRSL.

For more information, visit dnr.wi.gov/topic/Brownfields/Vapor.html