



September 26, 2023

Joel Smullen
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Via email: joel.smullen@marquette.edu

Subject: **Technical Review Request – Monitoring Program Modification**
Taxman Investments Co (FMR)
1214 W. Wells Street, Milwaukee, WI 53223
BRRTS #: 02-41-152248; FID: 241086120

On September 7, 2023, the Wisconsin Department of Natural Resources (DNR) reviewed the Technical Review Request for the case identified above. The Technical Review Request was prepared and submitted on your behalf by your consultant, Ramboll US Consulting, Inc (Ramboll). The DNR received a \$700 fee for providing this letter pursuant to s. 292.13 (2) and (3), Stats, and ch. NR 749, Wis. Admin. Code for the Taxman Investments Co (FMR) site.

Request

Based on the data collected to date, substantial reductive dechlorination is occurring; however, additional time is likely needed for concentrations to be reduced to levels where regulatory case closure is considered viable. Given the stable and reducing groundwater concentrations within the former source area, Ramboll requests DNR approval to reduce the sampling frequency from the current semi-annual schedule to annual. This reduced sampling frequency would allow for continued monitoring of site remediation progress while cost effectively utilizing the limited remaining Drycleaner Environmental Response Fund (DERF) Program funds and Marquette resources.

Response

The DNR is reviewing this request, but notes that the following open issues must be addressed before any modifications to the groundwater monitoring plan can be considered:

Site Investigation Completion

Discuss how potential downgradient impacts have been addressed, including the area east of MW-5. Based on the *Approval of the Site Investigation*, dated June 11, 2012, additional groundwater monitoring will be required during the remedial phase, to assess the success of the remedy, to further evaluate the conditions around MW-5, and to evaluate the potential for long-term impacts to the utility corridor and down-gradient properties after completion of a remedy. Additionally, include confirmation of land use and development on adjacent properties.

Vapor

In the next document submitted to the DNR, update the vapor intrusion screening assessment for the site to reflect current site conditions. Site-specific information such as contaminant type, concentrations, preferential pathways, and distances from receptors should be considered in the screening assessment. Locate all utilities on maps & cross-sections, include locations where the sanitary, storm, and water entered the source property, and assimilate site data into conceptual drawings and cross-sections. Include a discussion of the potential for the historical and current utilities to intersect the groundwater plume. Guidance regarding the performance of vapor intrusion screening assessments can be found in the DNR document *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin* (RR-800). Continuously update the vapor intrusion screening assessment for the site as new site data is received.

Groundwater Monitoring Program

Based on the current data collected from monitoring well MW-4, the following wells should be added to the groundwater sampling plan to assess any potential expansion of the groundwater plume following injections and to verify whether groundwater impacts are or will in the future extend to the adjacent property, the public alley, or the Wells Street Right-of-Way:

- MW-7 and/or MW-8 to the west
- MW-3 to the south.

Continue semi-annual groundwater sampling. Only 2 rounds have been collected after the most recent injection in July 2022. A minimum of two additional semi-annual sampling events are recommended, with a re-evaluation of the trends and possible sampling frequency going forward.

Emerging Contaminants

The DNR originally requested PFAS sampling at the site in a letter dated January 7, 2020, and approval of the PFAS sampling plan in February 2022. To date, the collection of PFAS groundwater samples from the site has not been completed. The DNR is requesting implementation of the PFAS sampling program, proposed in the March 16, 2022, *Semi-Annual Progress Report* (Ramboll, 2022). The groundwater sampling plan included the following items:

- Collect a groundwater sample from piezometer well PZ-1R and submit to Pace Analytical for laboratory analysis of PFAS (WI 33 compound). One duplicate sample, field blank, and trip blank will also be included for quality assurance and quality control (QA/QC) purposes.
- Collect a groundwater sample from upgradient monitoring well MW-2 for possible PFAS analysis. The laboratory will be instructed to extract and hold the MW-2 sample pending receipt and review of the PZ-1R and QA/QC sample results.
- Provide a WAC NR 716.14 data transmittal with the PFAS sampling results to the WDNR within 10-business days of receipt of the final laboratory analytical report.
- Formally present the PFAS groundwater sampling results in the routine semi-annual progress report.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, by phone at 414-316-0208 or via email at linda.stanek@wisconsin.gov.

Sincerely,



Linda Stanek
Senior Hydrogeologist
Remediation and Redevelopment Program

cc. Susan Petrofske, Ramboll US Consulting, Inc., spetrofske@ramboll.com
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