

Via Portal Upload

Ms. Linda Stanek
Wisconsin Department of Natural Resources
1027 W. St. Paul Avenue
Milwaukee, WI 53233

**RESPONSE TO WDNR COMMENTS
FORMER ONE-HOUR VALET DRY CLEANERS (TAXMAN)
1214 WEST WELLS STREET, MILWAUKEE, WISCONSIN
BRRTS NO. 02-41-152248**

Dear Ms. Stanek:

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Marquette University (Marquette), is submitting this letter in response to comments provided by the Wisconsin Department of Natural Resources (WDNR) in your September 26, 2023 letter "Technical Review Request – Monitoring Program Reduction" for the former Taxman/One-Hour Valet Dry Cleaner site located at 1214 West Wells Street in Milwaukee, Wisconsin (the "Site").

October 30, 2023

As detailed in your letter and summarized below, the WDNR identified several open items that "must be addressed before any modifications to the groundwater monitoring program can be considered." Marquette's responses to the open items identified in the letter by WDNR are provided as follows.

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WDNR Item 1: 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.

Ref. 1690005819

Marquette Response

This comment is acknowledged. A discussion regarding the downgradient impacts and land use on adjacent properties will be included in the next Semi-Annual Progress Report anticipated to be submitted to the WDNR during the first quarter of 2024.

WDNR Item 2: 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.

Marquette Response

This comment is acknowledged. The requested vapor intrusion assessment information will be included in the next Semi-Annual Progress Report anticipated to be submitted to the WDNR during the first quarter of 2024.

WDNR Item 3: 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; and
- 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.

Marquette Response

This comment is acknowledged. Existing monitoring wells MW-3 and MW-7 will be added to the existing groundwater monitoring program. The next semi-annual groundwater sampling event is scheduled for October 30 and 31, 2023.

WDNR Item 4: Emerging Contaminants

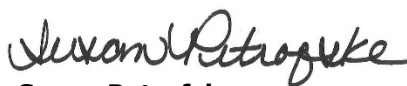
The DNR originally requested PFAS sampling at the site in a letter dated January 7, 2020, and approval of the PFAS sampling plan in February 2022. To date, the collection of PFAS groundwater samples from the site has not been completed. The DNR is requesting implementation of the PFAS sampling program,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

Marquette Response

Marquette acknowledges WDNR’s request. Until groundwater quality standards are promulgated at the state or federal level, Marquette has elected to defer implementation of the PFAS sampling work plan. Marquette and Ramboll continue to monitor the PFAS rule making process and propose to schedule the sampling once the applicable criteria are in place in accordance with the approved sampling plan.

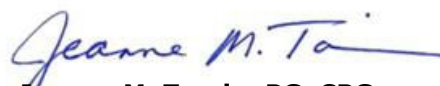
If you have any questions or need additional information, please contact either Marquette representative Joel Smullen (414-288-4620) or us at your convenience.

Yours sincerely,



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cc: Joel Smullen, Marquette University