



July 26, 2021

Hunn Family Trust  
c/o Lou Dodulik  
Mudroch & Dodulik, S.C.  
P.O. Box 5246  
Elm Grove, WI 53122

SUBJECT: Review of Site Investigation Update  
Speedy Lube aka Former Queens Way Cleaner  
117 E. Capitol Drive, Milwaukee, WI  
BRRTS#: 02-41-182420; FID#: 241081280

Dear Mr. Dodulik:

On February 8, 2021 the Wisconsin Department of Natural Resources (DNR) received a *Site Investigation Update – February 2021* (Report) prepared on your behalf by SCS Engineers, Inc. (SCS) for Speedy Lube, aka Former Queens Way Cleaner, located at 117 E. Capitol Drive, Milwaukee, Wisconsin (Site). After reviewing the Report, the DNR concurs with your proposed additional investigation and provides the following comments.

### **Background**

Contamination at this Site was reported to the DNR in 1997 and consists of chlorinated volatile organic compounds (CVOCs) in soil, groundwater, and vapor at the Site. Additionally, sub-slab vapor samples identified contaminant concentrations in exceedance of applicable vapor risk screening levels (VRSL) at a residential property off site to the east located at 3935 E. Capitol Drive, due to the VRSL exceedances an active vapor mitigation system (VMS) was installed. The Report proposed additional investigation activities and options to evaluate remedial actions.

The DNR provides the following comments:

### **Site Investigation**

#### **Groundwater**

- The Report proposed the installation and sampling of a fourth piezometer at the Site. The DNR concurs with this proposal. Note that the piezometer should be installed by cementing casing into the bedrock to prevent downward migration of CVOCs.
- The Report indicated concentrations of CVOCs detected in the groundwater above applicable Enforcement Standards at MW-2A. Given the proximity to occupied residential properties to the south, the DNR requests the installation of a groundwater monitoring well to the south of MW-2A to determine if vapor intrusion risks exist for nearby offsite properties and to define the degree and extent of contamination within groundwater.

- Groundwater is undefined to the west and to the east/southeast. Install a groundwater monitoring well to the west of the site and install a groundwater monitoring well to the east/southeast of MW-2A to define the degree and extent of contamination in groundwater in those directions.

### Vapor

- Due to VRSL exceedances in sub-slab samples, a vapor mitigation system was installed at the residential property located at 3935 E. Capitol Drive. Additional actions are necessary to demonstrate the VMS is effectively mitigating the vapor intrusion risk at this property. If not already completed, conduct commissioning, including indoor-air sampling and pressure field extension testing, to demonstrate the effectiveness of this VMS. Guidance related to VMS commissioning can be found in DNR publication *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin* (RR-800).
- Only one round of sub-slab vapor sampling has been conducted at the source property. The DNR requests an additional round of vapor sampling be conducted at the source property to confirm the initial results. The results of this sampling should be evaluated to determine if additional sampling and/or remediation is necessary.
- Only one round of sub-slab vapor sampling has been conducted at the Midwest Die Casting Company to the west of the source property. The DNR requests an additional round of vapor sampling be conducted at the Midwest Die Casting Company to the west to confirm the initial results. The results of this sampling should be evaluated to determine if additional sampling and/or remediation is necessary.
- Due to the elevated concentration of CVOCs in MW-2A, the DNR requests a vapor evaluation and applicable sampling be conducted at the commercial property adjacent to the south of the Site located at 3913/3915 N. Palmer St.
- Assess the utilities at the Site and determine if they are acting as a preferential pathway for vapor migration.

### Remediation

The Report states that SCS will evaluate the options for capping the source area previously approved by the DNR. Due to the identified VRSL exceedances at the Site, a remedial action to reduce the mass and concentration of CVOCs is required in accordance with Wis. Admin. Code § NR 726.05(8).

### Other

- If not already done, notification of contamination to affected offsite properties should be conducted, including the Rights of Way.
- The DNR is requiring an emerging contaminants scoping statement be submitted for every open environmental repair site prior to closure. Provide an emerging contaminants scoping statement.

**Next Steps**

The DNR requests a comprehensive site investigation report and applicable fee be submitted for review within **60 days** of completing the additional site investigation activities outlined above and in the Report per Wis. Admin Code § NR 716.15(1).

The DNR appreciates the actions taken to restore the environment at this site. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414) 750-7140 or at [issac.ross@wisconsin.gov](mailto:issac.ross@wisconsin.gov)

Sincerely,



Issac A. Ross  
Project Manager – Hydrogeologist Adv.  
Remediation and Redevelopment Program  
Southeast Region, Milwaukee

cc: Betty Socha, PhD, PG – SCS Engineers, Inc. (electronic)