



February 16, 2023

Mr. John Griffin  
City of Hartford  
109 N Main St.  
Hartford WI 53027

Subject: Site Investigation Workplan Notice to Proceed  
Jerry's Dry Cleaning Fmr  
28 S. Main St., Hartford, WI  
BRRTS #: 02-67-220908, FID #: 267170750

Dear Mr. Griffin:

The Department of Natural Resources (DNR) reviewed the document, *NR 716.09 Site Investigation Workplan* (the SIWP), submitted on your behalf by your consultant Stantec Consulting Services, Inc. (Stantec), and received by the DNR on December 20, 2022, with a fee for a written response from the DNR.

#### Regulatory Background

The DNR opened the BRRTS activity listed above, *Jerry's Dry Cleaning Fmr* (the Site), in 1998 when an investigation at what was then called the Nova Building across the street at 23 S. Main St. found PCE, a common dry-cleaning solvent in soil and groundwater in the right-of-way in front of the Site which was the location of a dry-cleaning operation called Jerry's Dry Cleaners sometime prior to 1985. In 2019 and 2020 Stantec conducted Phase I and a Phase II Environmental Site Assessments at the Site, followed by an investigation in 2022 that recommended that additional investigation be conducted.

#### Review

The DNR has reviewed the SIWP and finds the plan to be in general compliance with Wis. Admin. Code ch. NR 716. Proceed with the site investigation. Note that site investigation is an iterative process, and more work may be required depending on your findings. The DNR has the following comments and suggested changes regarding the SIWP, some of which may be addressed in your future site investigation report (SIR) submittal, or in a separate interim action report:

1. Evaluation of environmental media affected or potentially affected by the contamination

Per Wis. Admin. Code § NR 716.07(4), all environmental media affected or potentially affected by the contamination must be evaluated.

- Collect discrete soil samples (the SIWP was unclear on this).
- Discuss the presence of another discharge source of the identified polycyclic aromatic hydrocarbons (PAHs) or if soil fill may be the source of these contaminants.

2. Degree and extent of contamination in all affected media

Wis. Admin. Code § NR 716.11(3)(a) requires the field investigation to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.

- The extent of groundwater contamination appears to be undefined north of MW-2/PZ-2. Consider adding a well/piezometer nest on north side of the 10 S. Main St. property.
- Stantec proposes to collect vapor samples within utility manholes at three locations. The DNR generally agrees with the proposal to conduct a utility vapor assessment at the site, however it is unclear which type of utilities are proposed to be sampled. The DNR recommends including vapor sampling of the sanitary sewer. Future reports should include the type of utility that was sampled and the location of the sanitary sewer. Refer to DNR document RR-649 "Preferential Pathways" for guidance regarding investigation of utility conduits.
- When conducting vapor intrusion sampling investigations, the DNR recommends that you refer to DNR document RR-800 to calculate number of sub-slab samples needed for a building based on the square footage. For example, it appears an additional sub-slab sampling location is warranted at the 16 S. Main St. property (the barber shop) based on the square footage of the building.
- Assess the potential for vapor intrusion at the 10 S. Main St. building (the gift shop). Vapor sampling at the 10 S. Main St. property appears warranted based on the proximity to CVOC soil contamination.

### 3. Vapor Intrusion

Wis. Admin. Code ch. NR 726.05(8) requires completion of a remedial action to reduce the mass and concentration of volatile compounds to the extent practicable and interruption or mitigation of the vapor intrusion pathway in situations where vapors are present above the VRSL.

- Based on the VRSL exceedances at the Pour House (22 S. Main) in April of 2022 (39,000 ug/m<sup>3</sup> at VP1), installation of a vapor mitigation system (VMS) in the building appears warranted. Post-installation activities, such as pressure field extension testing and indoor air sampling, will be required to demonstrate the VMS is operating effectively.
- Based on the VRSL exceedances, remedial action to reduce the mass and concentration of volatile compounds to the extent practicable is required prior to case closure.

The sub-slab vapor concentration at VP1 was greater than three times the vapor risk screening level (VRSL) for PCE, a concentration at which the Department of Health Services has outlined, in a letter (attached) to the DNR dated March 25, 2021, that certain actions that should be taken within certain time frames. Guidelines regarding vapor mitigation system design, commissioning, operation, monitoring, and maintenance can be found in the DNR publication RR-800 "Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin."

#### Other DNR Comments

- Confirm presence of basements, sumps, and residential use in the following buildings: Pour House (22 S. Main), barber shop, gift shop, Nova bldg, Hank's Restaurant. If sumps are present, collect water & headspace air samples.
- Place indoor air samples at locations that may introduce vapor into the structure (i.e., utility connections) or sumps, if present.
- This is a reminder that off-site property owners must be notified of sampling results within 10 days in compliance with Wis. Admin. Code § 716.14(2).

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Schedule

In consideration of administrative code requirements, within 30 days of the date of this letter, submit an interim action plan which proposes a VMS at the Pour House.

The DNR looks forward to receiving the required site investigation report from your consultant that complies with Wis. Admin. Code § NR 716.15. 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, at 262-416-8643 or [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John Feeney". The signature is written in a cursive style with a long horizontal stroke at the end.

John Feeney, PG  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Ms. Erin Gross, Stantec  
Mr. Curtis Hedman, DHS