



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

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October 18, 2010

Mr. Ed Jones
Success, Inc.
116 Cornelison Rd.
Richmond, KY 40475

File Ref: FID#241287530
BRRTS#02-41-246246

Subject: Data Submittal Review for One Hour Martinizing
2262 S. 108th St., West Allis, Wisconsin

Dear Mr. Jones:

The Wisconsin Department of Natural Resources (WDNR) has reviewed the data submittal entitled "Summary of Supplemental Groundwater Sampling and Subslab Vapor Sampling" for the Success, Inc. property, located at 2262 S. 108th Street, West Allis. The sampling summary report, prepared and submitted on your behalf by Arcadis, to document sampling conducted in 2009 that was required by the WDNR in our 2008 case closure review.

The groundwater sampling further supports the previous groundwater data, indicating that the injection program has successfully reduced contaminant concentrations in groundwater and the remaining contaminant plume appears to be stable or decreasing. No further groundwater remediation actions will be required for the identified plume. Monitor wells may be abandoned at this time.

The WDNR has established target concentrations for subslab vapor contaminants, which are based on EPA published indoor air protection concentrations, and allow for a 10-fold protection factor for an intact floor slab. For carcinogenic compounds, such as PCE, the health protection concentration used for our indoor air target represents a 1-in-100,000 excess cancer risk level. The WDNR target concentration for PCE in subslab vapor at a non-residential use building is 3.09 ppbv. In the two subslab vapor samples collected beneath your building, PCE was found at 1,900 ppbv and 12,000 ppbv.

The high sub-slab vapor levels may be indicative of an existing source in soil beneath the building. As no soil samples have been collected beneath the slab for drycleaning VOC analysis, this has not been confirmed. Other potential sources for these levels include vapor migration from the known source area outside the building, or vapor migration directly through floor slab cracks or openings from the dry cleaning machine or solvent storage areas in the building. Vapor sampling equipment leaks may also account for unexpected high levels in subslab vapor samples, but this is a less likely cause.

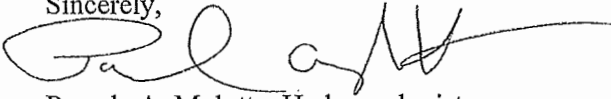
Additional investigation will be required to further assess the cause and potential receptors for the apparent vapor migration. Soil samples near the highest vapor sample will be necessary to help assess possible sources. The integrity of the floor within the drycleaner building should be assessed, identifying any cracks or drains near the drycleaning machine or solvent storage areas. Additionally, a soil boring to the east of the building, near the dry cleaning machine, should be conducted to assess whether there is a potential for vapor migration to the east. And the occupancy and use of the building to the east should be determined as well as whether that building has a basement. Finally, due to the presence of tetrachloroethylene a soil sample on the adjacent property to the north

(B-11) near basement depth, assessment of vapor quality beneath the building on that property is needed. The assessment should also include a determination of whether a sump or other openings exist in the basement floor.

Please have your consultant submit a scope of work and cost estimate to complete the vapor assessment. Based on the subslab vapor levels found, it is likely that installation and long-term operation and maintenance of a subslab depressurization system beneath the drycleaner building will be required to achieve case closure for this site. Your consultant may include costs for this installation in the requested scope of work, but these should separately shown, as the installation will be contingent on Department review and approval of data from the required vapor assessment. Your consultant's proposal should also contain contingency costs to collect additional sub-slab vapor samples from beneath the dry cleaner building, to include leak detection for the sampling system.

If you or your consultant have questions regarding this letter, please contact me at (414) 263-8758.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pamela A. Mylotta', with a long horizontal flourish extending to the right.

Pamela A. Mylotta, Hydrogeologist
Remediation & Redevelopment Program
Southeast Region, Milwaukee Service Center

C: Ed Buc - Arcadis