



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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October 13, 2009

Mr. Donald Fritzke, Trustee  
Donald M. Fritzke, Sr. Revocable Trust 1200  
N161W20772 Kami Lane  
Jackson, WI 53037

File Ref: FID#241170270  
BRRTS#02-41-278106

SUBJECT: Air Sample Results  
Former Colony Dry Cleaner building, 10003 W. Carmen Avenue, Milwaukee, WI

Dear Mr. Fritzke:

The Department reviewed the air sample results that were submitted in July, and sent a preliminary discussion of the results to your consultant at that time. The purpose of this letter is to ensure you have a copy of that response, give my assessment of the project's status, and provide you an opportunity to contact me with any questions you may have about the air results and the Department's assessment of them. A copy of the electronic mail response is attached.

As provided by your consultant, United Engineering Consultants, sub-slab soil vapor samples were collected beneath the floor at three locations within the building: under the front office area, under the back equipment room, and under the east storage area. An indoor air sample was also collected from within the front office area. Sub-slab vapor samples provide an indication of the level of contamination beneath the floor that may pose a risk to indoor air intrusion, through floor cracks or openings. Indoor air samples measure the level of contaminants in the air that building occupants would breathe. The indoor air quality may be affected by vapor intrusion from beneath the floor, by other contaminant sources within a building, by general outdoor background air levels, or by all three. Based on exposure assumptions and health criteria levels developed by US EPA, the Wisconsin Departments of Health and Natural Resources develop indoor air target levels for evaluating contamination projects for two different building use scenarios: residential (which includes sensitive population uses such as daycares, schools, medical buildings) and non-residential (which includes most commercial and industrial uses). The target values are based on a 1 in 100,000 excess cancer risk. When indoor air concentrations at a site are above the target values, action needs to be taken to protect building occupants, especially in residential or sensitive population occupancy.

The indoor air sample taken from your building found tetrachloroethylene above both the residential and non-residential target values. The target values for this compound are based on a long-term exposure that is expected to increase an exposed person's cancer risk over their lifetime. The level found, 25.2 ug/m<sup>3</sup>, was just above the non-residential occupancy target, and would represent a lifetime excess cancer risk in a residential use exposure of between 1 in 100,000 and 1 in 10,000. Benzene was found in the indoor air sample, at 8.8 ug/m<sup>3</sup>. This concentration appears to be just above a 1 in 100,000 excess cancer risk level for a residential use scenario. The sub-slab soil vapor samples taken from beneath the west side of your building also found tetrachloroethylene at very high concentrations, 176,000 and 57,600 ug/m<sup>3</sup>, which are consistent with the high soil concentrations found beneath the building.

Because there is a high level source beneath the building which poses a risk to indoor air quality, the Department would require remedial actions be taken to reduce the indoor air concentrations, which may include source removal or reduction and installation of a sub-slab vapor mitigation system. Other actions may also be taken to

help improve the indoor air quality, including increasing air turnaround from the heating and air conditioning system, sealing cracks, holes or other openings in the floor, cleaning floors, and removing any possible source materials from inside the building such as paint, gasoline or oil cans or any drycleaning solvent or machinery.

The timeframe for conducting actions to address the indoor air contamination depends on the current and planned building occupancy. Our understanding is that the building is currently not occupied, and you do not have immediate plans to allow occupancy, but are trying to sell and/or lease the property. To allow occupancy, you should first take actions to reduce the indoor air concentrations to below the Department's target levels, and would need to re-sample indoor air on a regular basis as long as the building is occupied, until remedial actions have been completed. Some of these actions may be eligible for reimbursement through the DERF program, and a cost estimate and work plan would need to be approved by the Department before they are carried out, if you decide to move forward to allow occupants in the building.

As long as the building remains unoccupied, there is not an immediate need to address the indoor air concentrations, and the DERF project should move to the completion of the Site Investigation phase and into the Remediation phase. I have recently spoken with your consultant, Tim Anderson of United Engineering Consultants, and concur with his plans to complete a Site Investigation Report and a Reimbursement Claim on your behalf. The Department will review your Site Investigation Report to determine what your next steps should be. The normal progression in the DERF process is for the Department to instruct the Applicant (you) to request bids from three to six consultants for remediation work. Once we approve the SI Report, you would send copies to the potential bidders. Similar to the Site Investigation phase, the consultants then send you and the Department sealed bids. The remediation bids, however, reflect each consultant's opinion on what is the best remedy for the site, and must include a comparison of potential remedies for the site. The DERF rules require that the lowest cost acceptable bid be selected, but the Department will play a major role in determining what is acceptable and what is not.

Once we have received and reviewed your Site Investigation Report, I will contact you to discuss the next steps. We will also review your Reimbursement Claim when it is submitted, and you should expect approximately three months for us to process it and issue you a check, depending on the completeness of the claim. If you have any questions as you proceed, please call me at (414) 263-8758. The Department appreciates your efforts to remediate this property, and I hope this letter helps keep you informed of our review and assessment.

Sincerely,



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

Enclosure – July 14, 2009 Electronic Mail Message from DNR to Tim Anderson, UEC

C: Tim Anderson – United Engineering Consultants  
Henry Nehls-Lowe – WI Dept. of Health

**Mylotta, Pamela A - DNR**

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**From:** Mylotta, Pamela A - DNR  
**Sent:** Tuesday, July 14, 2009 2:45 PM  
**To:** 'United Engineering Tim Anderson'  
**Subject:** RE: Former Colony Dry Cleaners

Tim,

I looked over the results you sent me, and had a brief conversation about them with a staff person at the State Health department. I am waiting to discuss this further with other folks in our program. I don't know if I told you that our program has established some informal target concentrations for indoor air, based on health levels developed by EPA and others. But you may have already looked up the EPA health levels yourself. We are using a 1 in 100,000 excess cancer risk level as our target for indoor air. Here are our targets, compared to the site data you obtained.

<u>Compound</u>	<u>Residential*</u>	<u>Non-Residential*</u>	<u>Site Data</u>
PCE	4.1	21	25.2
TCE	12.0	61	2.8

data are in ug/m3, all numbers are for indoor air samples.

\* Residential includes other non-residential uses where sensitive populations may be present such as schools, daycares, health facilities.

\* Non-residential is most commercial, industrial uses.

You can see from the table that the site PCE level is above both target values, although it is still fairly low. But remember that the targets are a  $1 \times 10^{-5}$  risk level, so we've already increased the targets above what we would normally use, which would be a  $1 \times 10^{-6}$  risk level (soil and groundwater targets).

Based on this, your client should be advised that, to have this building occupied, he should consider some sort of action to reduce the indoor air levels. This may be something like making sure the floor is fully sealed - all cracks sealed, unnecessary drains abandoned and sealed. The HVAC system may need to be improved as well to create a better positive pressure in the building. Also, make sure there are no sources in the building - drums/containers of any PERC or PERC residue. Additional indoor air samples will be needed after any improvement work is done to verify that the air levels have reduced. Some of this work may be DERF eligible, so we may want to meet on this with your client and then you could submit a work plan and cost estimate for the work we would deem eligible.

The topic of discussion we will be covering internally here is what level of remediation we will seek, and when a subslab vapor mitigation system will be required. The data we have strongly indicates that the source is beneath the building, probably from the underground storage tank, but it does appear to have traveled to the north possibly along utility lines. The levels under the building appear to be somewhat high, as reflected in the sub-slab vapor samples. I could not predict what type of remedy would be appropriate here, but an evaluation will need to be done. This is normally done as part of the DERF remedy bid process (i.e. not part of the SI DERF contracts).

At this point we don't require any additional sample points beyond what we have approved, so you may proceed with the planned soil boring in the Carmen Street right of way. I will get back to you regarding our discussions, and let you know whether to proceed with the SI report.

You and your client probably also noticed that there were several detections of other chemicals in the subslab and indoor air samples. These appear to be related to petroleum, and could reflect general background levels, or some influence from the storage or parking of vehicles in the east part of the building. I will run the numbers past the State Health department folks officially, but they do not appear to exceed any health levels, based on my initial conversation with Health staff.

10/20/2009

*Pamela A. Mylotta*

Hydrogeologist, WDNR Remediation & Redevelopment Program  
Southeast Region, Milwaukee Service Center

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**From:** United Engineering Tim Anderson [mailto:tauec@sbcglobal.net]  
**Sent:** Monday, July 13, 2009 10:11 AM  
**To:** Mylotta, Pamela A - DNR  
**Subject:** Former Colony Dry Cleaners

Pam,

These are the results of the indoor air and sub-slab vapor analysis for the former Colony Dry Cleaners.

We have also completed the exterior subsurface sampling. Please call to discuss!

Tim Anderson

**Timothy J. Anderson, P.E.**  
**Principal**

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