



June 2, 2023

Mr. Donald M. Fritzke, Trustee  
Donald M. Fritzke, Sr. Revocable Trust 12/21/00  
N161 W20772 Kami Lane  
Jackson, WI 53037  
*Email only to dmfritzke@yahoo.com*

SUBJECT: Review of Site Investigation Report  
Colony Dry Cleaners Former, 10003 W. Carmen Ave., Milwaukee, WI  
BRRTS #02-41-278106, FID #241170270

Dear Mr. Fritzke:

On April 18, 2023, the Wisconsin Department of Natural Resources (DNR) received the *NR 716 Site Investigation Report* (SIR), dated April 18, 2023, by United Engineering Consultants, Inc. (United) for the site referenced above. The SIR was reviewed for compliance with Wis. Admin. Code ch. NR 716. Based upon the review of this SIR, the DNR has determined that additional soil, groundwater and vapor investigation activities are needed to complete the site investigation.

This site has been renamed in BRRTS from “CDC Inc.” to “Colony Dry Cleaners Former” to identify the former business name, as identified in the Wisconsin Department of Financial Institutions database. The new name has been referenced in reports to date and should continue to be referenced on all future correspondence.

### **Background**

The site is being investigated for the discharge of chlorinated volatile organic compounds (CVOCs) that were used in dry-cleaning operations in the former equipment room in the southwest corner of the building. The dry-cleaning machine that used the solvent tetrachloroethene (PCE) from 1969 to 1971 was located in the “former equipment room,” as shown on site figures. This machine was replaced by dry-cleaning machines that used mineral spirits and were located in the “former dry cleaning room” identified on site figures as approximately 30 feet east of the PCE source area. An estimated 500 gallon underground storage tank (UST) that was used for secondary containment beneath the PCE dry cleaning machine was closed in place in 2006. A sanitary sewer line inlet that was north of the PCE source area was abandoned in the 1980s when the piping ruptured in an unknown location. There was also a storm sewer inlet in the PCE source area that was abandoned in 1996 but was not identified on site figures.

Contamination from the PCE solvent and its breakdown products was discovered during an environmental Phase II investigation and reported to the DNR on July 26, 2001. The Dry Cleaner Environmental Response Fund (DERF) application was approved in 2001. The degree and extent of contamination in soil, groundwater, and vapor are being investigated following DERF program requirements.

Since 2001, a total of 59 soil samples were collected from 29 boring locations across the site and on properties to the north and south. Groundwater samples were collected from 10 boring/temporary well locations for one sample event when installed between 2001 and 2009 and from three permanent monitoring wells on four occasions between 2002 to 2014. Vapor sampling included indoor air and sub-slab sampling within the building in 2009.

There were no small commercial vapor action levels (VALs) exceedances in indoor air. Trichloroethene (TCE) concentrations exceeded the commercial and industrial building vapor risk screening levels (VRSLs) in the sub-slab vapor sample collected in former equipment room source area, and PCE concentrations exceeded commercial and industrial VRSLs in two of the three sample locations. In 2019, United installed and sampled five sub-slab vapor probes within the building. Sample results identified PCE, TCE and cis-1,2-dichloroethene concentrations that exceed small and large commercial and industrial building VRSLs beneath the former dry cleaning room, office, and warehouse portions of the building. (In November 2022, VRSLs were established for cis-1,2-dichloroethene that match the VRSLs for trans-1,2-dichloroethene.) In 2021, sub-slab vapor samples were collected from two locations at the car wash to the south, prior to that owner's request to the DNR for an off-site liability exemption for contamination that migrated onto their property from the Colony Dry Cleaners source. No constituents were detected at the car wash at concentrations that exceeded any VRSL.

### **Investigation Completeness**

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

The DNR provides the following comments:

#### **1) Soil**

- a. The SIR includes a statement that soil contamination is generally delineated laterally, but does not state how contamination is defined vertically. The greatest CVOC concentrations detected are in the deepest samples collected in the former equipment room source area at GP-17 and northwest of the building at GP-5 and GP-6. The vertical extent of soil contamination is needed to ensure that groundwater monitoring wells and their well screens are properly placed to define the groundwater contaminant plume that may be migrating laterally and vertically.
- b. Additional soil investigation is needed to define the degree and extent of contamination beneath the building. There has been no evaluation of the relationship of contaminated soil northwest of the building to the contamination in the former equipment room source area 50 feet to the southeast. An evaluation and likely additional investigation will be required to determine whether contamination has migrated along utilities from the source area. It is unclear whether contamination may be localized along the storm water sewer and/or sanitary sewer that were previously abandoned under the building or if it is more widespread.
- c. Detailed soil boring logs will be important for identifying more permeable stratigraphic intervals where contamination may be preferentially migrating laterally and/or vertically.

#### **2) Groundwater**

- a. The groundwater monitoring network is not sufficient for defining the extent of contamination. Currently, there is no source area monitoring well. The three deep monitoring wells (MW-1, -2 and -3) are side gradient to the source and therefore not adequate for evaluating the degree and extent of contamination at depth. The DNR does not agree with United's conclusion that contaminated water in the temporary wells are indicative of soil rather than groundwater contamination. In general, there are no recent data with which to evaluate the degree and extent of groundwater contamination.
- b. One or more monitoring wells are needed to characterize the vertical groundwater contaminant plume in the source area. TW-17 was placed in the source area in 2006, but only one round of data was collected from this well. The vertical extent of soil contamination was not defined at GP-17, where that well was installed.

- c. It has not been demonstrated that the vertical extent of groundwater contamination is defined laterally or vertically from the source area.
- d. Figures 9 and 10, Groundwater Isoconcentration Maps in the SIR depict groundwater contamination at GP-3 as separate from the main contaminant plume further west. However, contamination at GP-3 may be part of the same contaminant plume identified in groundwater samples collected from temporary wells installed to similar depths. This should be verified with additional sampling or the contamination at GP-3 needs to be evaluated to determine whether there is an additional source in that area. Additional sampling is needed in this area to determine whether the extent of contamination is defined to the east-southeast.
- e. After additional groundwater monitoring is conducted, the conceptual site model should be reevaluated and modified, as needed, to include an evaluation of the lateral and vertical extents of the soil and groundwater contaminant plumes.

### 3) Vapor

- a. An evaluation the CVOC contamination along utility corridors through which vapors may migrate is required per Wis. Admin. Code § NR 716.11(5). Detailed guidance for investigating utilities is available in DNR Publication RR-649, *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors* (June 2021).
- b. The vapor investigation needs to be expanded to include sub-slab sampling within the off-site buildings to the northeast and southwest.
- c. Additional sub-slab sampling is needed within the site building to determine current conditions. Vapor data should be evaluated to determine whether vapor concentrations within the warehouse and former dry cleaning room are a result of sub-slab conditions that are in direct communication with vapors detected beneath the office and former equipment room, or if vapors may be preferentially migrating via utilities or some other mechanism. This information is important for considering the potential scope of remedial effort that will be needed to address the source and extent.
- d. It is recommended that you identify the relationship between soil and vapor contamination with cross-sections that depict the source area, utilities, general location of abandoned utilities, and the soil and vapor data points.

### 4) Emerging Contaminants/PFAS

Although PFAS compounds may not have been used or stored at this site, PFAS compounds may have transferred from garments and other items treated with PFAS compounds to the waste solvent in the dry-cleaning process. Site investigation has shown that a significant amount of waste solvent was released to soil and groundwater beneath the former dry-cleaning machine. Since the waste solvent may contain PFAS compounds, the DNR requests that you conduct a minimum of one round of PFAS sampling at a source area (contaminated) monitoring well and at least one down-gradient monitoring well in which contamination has been identified.

### Next Steps

To date, this site has been investigated following DERF program requirements. To maintain DERF eligibility, an approved change order from your current consultant, or selection of a new consultant through a bidding process

will be required before conducting additional activities. The DNR requests that your selected consultant submit a work plan within 60 days for completing the activities required to address the DNR's concerns outlined above.

The DNR appreciates your efforts to protect Wisconsin's environment. If you have any questions, please contact me, the DNR Project Manager, at [linda.michalets@wisconsin.gov](mailto:linda.michalets@wisconsin.gov) or at 414-435-8010.

Sincerely,



Linda Michalets  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Tim Anderson, United Engineering Consultants, Inc. ([tauec@sbcglobal.net](mailto:tauec@sbcglobal.net))