



November 20, 2018

Mr. Richard Peters  
Former Peter's Dry Cleaners  
5094 West College Avenue  
Greendale, Wisconsin 53192

Subject: Review of Site Investigation Report and Request for Additional Information  
Former Peter's Dry Cleaners (aka Peter's Deli), 5094 West College Avenue, Greendale, WI 53192  
DNR FID#: 341045210; DNR BRRTS# 02-41-284323

Dear Mr. Peters:

On September 10, 2018, the Wisconsin Department of Natural Resources (DNR) received a *Site Investigation Report Update* (SIR) dated September 6, 2018 prepared by EnviroForensics, LLC (EnviroForensics) for the site identified above. The DNR previously received an *Initial Site Investigation Report* dated June 19, 2014 as well as a *Site Investigation Report* dated April 28, 2016. The DNR sent response letters to each previous report on August 5, 2014 and June 7, 2016 respectively.

The DNR has reviewed the SIR and provides the following comments:

#### **Variance Request from Required DERF Deductibles**

##### **A. Waiver of Deductible**

Waiver of deductible (Wis. Admin. Code § NR 292.65(8)(g))

1. The SIR included a request for a variance from the required Dry Cleaner Environmental Response Fund (DERF) deductibles while expressing the intent to use DERF moving the site forward. The DNR can only waive the requirement for an owner/operator to pay the deductible amount if the DNR determines the owner/operator is unable to pay. If the DNR waives the requirement to pay the deductible, the DNR would have to record a lien on the property until the deductible had been paid in full. The DNR is unable to provide a waiver of the DERF deductible for past work performed.
2. The request to move site investigation and remediation activities at the site forward using DERF should be made by the owner/operator of the site as defined in Wis. Admin. Code § NR 292.65 and not by their environmental consultant.

## Scoping the Site Investigation

### B. Sampling Parameters

Knowledge of contamination (Wis. Admin. Code § NR 716.07 (2))  
Sampling and analysis strategy (Wis. Admin. Code § NR 716.09(2)(f)8)

1. Contamination at this former dry cleaner was reported to the DNR in 2001 during a Phase II Environmental Site Assessment. The suspected sources of contamination include a former dry-cleaning machine and former chlorinated materials storage for dry-cleaning operations. Site investigation activities to-date included the analysis of soils samples for chlorinated volatile organic compounds (CVOCs). Site investigation activities also included the analysis of groundwater samples for CVOCs as well as dissolved gases, inorganic/physical parameters, and dehalococoides for natural attenuation indicator parameters. Results of the laboratory analysis identified CVOCs in the soil above residual contaminant levels (RCLs) and groundwater above enforcement standards (ES).

## Soil

### C. Degree and Extent of Soil Contamination

Degree and extent of contamination (Wis. Admin. Code § NR 716.11(3)(a))  
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(e))  
Visual aids – Cross Sections (Wis. Admin. Code § NR 716.15(4)(d))

1. The SIR identified high concentrations of CVOCs at a depth of at least 9 feet below ground surface (bgs). The SIR does not identify nonimpacted native soils below confirmed contamination at depth. The DNR recommends installing a piezometer as close to the source as possible near the northwest corner outside of the building at a depth of at least 20 to 30 feet bgs. During the installation of the piezometer, the DNR recommends screening and sampling soil removed from the boring to define the vertical extent of soil contamination at the site.
2. The cross section included in the SIR selected borings along an east-west direction to create the A-A' geologic cross section. The cross section does not intersect the suspected source of contamination at the site. The cross section also does not show high and low water table elevations, nor does it represent the suspected contamination plume in the subsurface. The DNR recommends creating a B-B' cross section that runs north-south and intersects the suspected source on the site. The DNR also recommends amending the current cross section to include high and low water table elevations, as well as including the suspected contamination plume with the most current data.
3. The SIR states that groundwater at the site was observed ranging from approximately 2 – 12 feet bgs. Soil boring logs submitted to the DNR indicate that saturated soils were noted during drilling activities for the site investigation. Ensure all saturated soil samples analyzed are properly noted in tables and on figures in future submittals.

## **Groundwater**

### **D. Degree and Extent of Soil Contamination**

Degree and extent of contamination (Wis. Admin. Code § NR 716.11(3)(a))  
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(e))  
Extent of groundwater contamination (Wis. Admin. Code § NR 716.11(5)(f))  
Visual aids – Isoconcentration Maps (Wis. Admin. Code § NR 718.15(4)(c))  
Visual aids – Cross Sections (Wis. Admin. Code § NR 716.15(4)(d))

1. The SIR identified ES exceedances in down gradient monitoring well MW-11 for multiple rounds of groundwater sampling events. As stated in a previous letter sent by the DNR dated June 7, 2016, “if ch. NR 140 Wis. Admin. Code enforcement standards continue to be exceeded at off-site well MW-11, a new well or wells will be needed to define the extent of contamination...” Because the most recent rounds of groundwater sampling completed at MW-11 have continued to exceed ESs, the DNR recommends installing at least one new down gradient well north/northwest of MW-11 to define the degree and extent of groundwater contamination off-site to the north/northwest of the site. This new monitoring well should be included in any future groundwater sampling plans.
2. Groundwater and soil sampled near the suspected source area around the former dry-cleaning machine exceed soil RCLs and groundwater ESs as presented in the SIR. To define the vertical extent of CVOC contamination at depth, the DNR recommends installing a piezometer near the source area in the northwest corner of the exterior of the existing building to a depth of at least 20 to 30 feet bgs. Soils should be screened and sampled to define the vertical extent of contamination while groundwater should be sampled to define the vertical extent of CVOC contamination in the groundwater on site. This new piezometer should be included in any future groundwater sampling plans.
3. Groundwater figures included in the SIR show data from sampling events completed in 2016, however, the groundwater tables included in the SIR show up to five additional sampling events conducted in 2017. All figures included in future submittals should represent the most recent sampling event conducted at the site for all environmental media.

## **Vapor**

### **E. Degree and Extent of Vapor Contamination**

Degree and extent of contamination (Wis. Admin. Code § NR 718.11(3)(a))  
Extent of contamination (Wis. Admin. Code § NR 716.11(5)(e))

1. As requested in a letter from the DNR dated June 7, 2016, provide an assessment of the potential for vapor intrusion to be a pathway of concern on the property to the north/northwest of MW-11. This assessment should determine whether the property to the north/northwest of MW-11 is an off-site receptor of contamination generated from the former dry cleaner.
2. Vapor Risk Screening Levels (VRSLs) used on the “Sub-Slab and Indoor/Outdoor Air Vapor Sample Analytical Results” figure (Figure 9) submitted with the SIR are not the correct VRSLs. The vapor table

included in the SIR used the correct VRSLs. When applicable, amend any incorrect screening levels used in future submittals on both figures and tables.

### Next Steps

The DNR requests a Site Investigation Work Plan (SIWP) for the remaining site investigation needed within **60 days** by January 20, 2019.

A new Site Investigation Report, prepared in accordance with Wis. Admin. Code ch. NR 716 should be submitted to the DNR within 60 days after completion of the field investigation. Any amendments or additions to the SIR should be addressed prior to submitting and included in any future reports. Once site scoping and additional investigation has been completed, remedial response requirements can be identified and the pathway to case closure determined.

If you wish to continue to work with your current consultant and be eligible for DERF reimbursement, you will need to request a waiver from the Wis. Admin. Code ch. NR 169 rule requiring competitive bidding for the consultant performing the site investigation. Upon approval, a work plan and cost estimate should be prepared by your consultant for any DERF related work in the future. If you wish to hire a different consulting firm, you will need to solicit bids as required in Wis. Admin. Code § NR 169.11(1)(c).4.

The DNR hopes the additional site investigation work needed will complete the site investigation portion of the environmental remediation at this site allowing it to move forward towards case closure. The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact me at (414) 263-8519 or at [issac.ross@wisconsin.gov](mailto:issac.ross@wisconsin.gov).

Sincerely,



Issac Ross  
Project Manager – Hydrogeologist  
Remediation & Redevelopment Program  
Southeast Region, Milwaukee

cc: Rob Hoverman, Enviroforensics, LLC (electronic)