



February 29, 2024

DLAR LLC
ATTN: Davis Idrizi
10255 Whitnall Ct.
Hales Corners, WI 53130

Subject: Review of Site Investigation Work Plan
Fabricare – Former, 323 W. Sunset Drive, Waukesha, WI 53189
BRRTS Activity # 02-68-305374; FID # 268087820

Dear Mr. Idrizi:

On December 19, 2023, the Wisconsin Department of Natural Resources (DNR) received the “Soil Data and Groundwater Sampling Work Plan (Work Plan)” for the site referenced above. The Work Plan was prepared by your consultant, KPRG and Associates, Inc. (KPRG), and was submitted with a fee for DNR review and response.

Work Plan Summary

Chlorinated volatile organic compounds (CVOCs) have been identified in soil, groundwater, and vapor at the site at concentrations that exceed regulatory standards. The CVOC contamination is the result of dry-cleaning operations that occurred at the site from approximately 1973-1981. The work plan includes an analysis of existing soil data and concludes that additional soil sampling is not necessary at the site. The workplan also includes a proposal to collect additional groundwater samples to assess current groundwater conditions.

DNR Review

The Work Plan was reviewed for compliance with Wis. Admin. Code ch. NR 716. The DNR approves the Work Plan and recommends you proceed with the proposed groundwater sampling. The DNR provides the following comments and requests:

- The degree and extent of soil contamination is undefined and additional soil sampling is necessary to complete the site investigation. A limited amount of shallow soil samples have been collected at the site to date. Additional shallow soil sampling near the former dry-cleaning machine and dumpster source areas is necessary to determine the degree of contamination. Additionally, the degree and extent of soil contamination is undefined east of the source area and near the eastern property boundary. The results of the sub-slab vapor sample collected at SSV-1 indicate there may be additional mass of contamination near the northeast portion of the on-site building.
- Include PZ-1R and MW-4 in the groundwater monitoring program.
- The Work Plan proposes to replace monitoring well MW-2 due to accessibility issues. The Work Plan requests a variance to Wis. Admin. Code ch. NR 141 monitoring well construction requirements to replace MW-2 with a 1-inch diameter well. The variance request is approved; comply with all other well construction requirements.
- In an email dated January 30, 2024, KPRG stated they will attempt to gain access to the residence located at 1411 Victoria Drive to collect vapor samples. The DNR recommends collecting sub-slab samples and passive long-duration (5-14 days) indoor air samples at this residence. If a sump is present, collect a sump

water sample and a vapor sample from the headspace of the sump. If access is not granted, contact the DNR for assistance gaining access.

- Three sub-slab vapor samples were collected at the on-site building in 2011. The concentration of tetrachloroethene (PCE) exceeded the small commercial vapor risk screening level (VRSL) in one of the samples. In an email dated January 30, 2024, KPRG stated they plan to collect a new sample to confirm the previously identified VRSL exceedance.

Based on the concentrations of PCE detected in all three of the previous sub-slab vapor samples, sub-slab vapor samples should be collected in multiple locations to evaluate conditions beneath the entire footprint of the on-site building. Passive long duration (5-14 days) indoor air samples should also be collected to evaluate indoor air quality. If a sump is present, collect a sump water sample and a vapor sample from the headspace of the sump. The results of the vapor sampling should be evaluated to determine whether additional sampling and/or installation of a vapor mitigation system is warranted.

As an alternative to collecting additional sub-slab vapor samples at the on-site building, a vapor mitigation system that adequately depressurizes the entire footprint of the building may be installed. If a vapor mitigation system is installed, activities such as pressure field extension testing and indoor air sampling will be necessary to demonstrate the mitigation system is operating effectively.

- Provide the location of utilities at and near the site in future submittals and conduct an assessment to determine whether utilities are acting as preferential pathways for migration of contamination at the site.

Based on the site history and presence of a sanitary sewer near the former dry-cleaning machine and sump, vapor sampling within the sanitary sewer at and near the site is warranted. See DNR guidance document “Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors” (RR-649) for guidance on completing the utility investigation.

- Provide photos of the abandoned sump located near the former dry-cleaning machine.
- Evaluate the site history to determine whether investigation of emerging contaminants such as perfluoroalkyl and polyfluoroalkyl substances (PFAS) is warranted at the site per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09. Provide your determination in a future submittal.
- The Work Plan does not comply with Wis. Admin. Code ch. NR 712 because the required signature is missing. Ensure that future submittals comply with Wis. Admin. Code ch. NR 712 signature and certification requirements.

Next Steps

Proceed with the proposed groundwater sampling within 60 days of this letter per Wis. Admin. Code § NR 716.11(2r) and develop a work plan to address the comments above. The results of the additional site investigation should be evaluated to determine whether additional investigation or remediation is warranted.

We appreciate your efforts to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me at (414) 218-6042, or by email at joseph.martinez@wisconsin.gov.

Sincerely,



Joseph J. Martinez

Hydrogeologist – Southeast Region
Remediation & Redevelopment Program