

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212-0436
Telephone 414-263-8500
FAX 414-263-8716
TTY 414-263-8713

July 28, 2005

Mr. Ralph Hoffman
2010 W. Woodbury Lane
Glendale, WI 53209

File Ref: FID# 241083150
BRRTs# 02-41-307576

Subject: Denial of Closure for Hoffman's Valet Cleaners
7215 W. Center Street, Wauwatosa

Dear Mr. Hoffman:

On July 27, 2005, the Department of Natural Resources reviewed your request for closure of the case described above. A report titled "Site Investigation and Closure Report" was received by the Department in May 2005, along with the \$750 closure fee and \$200 Soil GIS Registry fee. The Department reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of your closure request, the Department has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements required for obtaining closure, and request your written response within 60 days of receiving this letter.

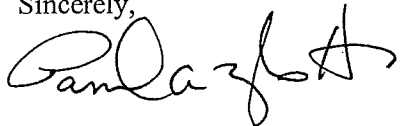
The following comments are provided to assist you in completion of your project:

1. Additional site investigation is needed.
 - a. The apparent source of the contamination found to date has been identified as the dry-cleaning operations on the property, although a specific source for the release of this contamination was not identified. The diagrams provided in the report show the location of a dry-cleaning machine, which is one potential source. Drains, holding tanks, waste or product storage areas are other potential source areas and should be identified. All potential source areas should be evaluated and investigated with shallow soil samples.
 - b. The migration of contaminants from the source areas needs further assessment. It is clear that contamination has traveled into the sand unit lying between 5 and 13 feet below ground surface. The report submitted makes no assessment of this phenomenon or potential migration pathways or mechanisms. The role of the basement and fill around and beneath it have not been assessed. The potential variation in groundwater elevation has not been considered. Samples were not collected within the sand unit beneath the building, and so the levels of contaminants in this unit closer to the only identified potential source are not known.
 - c. The lateral extent of contamination has not been defined. The soil samples collected within 10-12 feet below the surface in MW-1, MW-2, GP-103 and GP-105 all found the source contaminant, tetrachloroethylene (PCE) at levels that may threaten groundwater. Based on this information, additional investigation is needed beyond these points to define the extent of contamination.
 - d. Only one round of groundwater samples and measurements were collected from the monitor wells. This is not adequate to complete the site investigation. The Department normally requires 4 quarters of groundwater measurements and sampling. The Department also normally requires a monitor well be located as close to the source as possible.

- e. The Department has begun to more consistently require that vapor migration pathways and the potential risk from vapor intrusion be evaluated at sites with chlorinated solvent contamination. This pathway requires some assessment and potential investigation.
2. A workplan should be submitted to address the site investigation comments provided above. The workplan should include revised site cross-sections and maps to depict both the contaminant levels identified in the sampling and a visual representation of the assessment of the extent of contamination.
3. Because you are working to receive reimbursement through the Drycleaner Environmental Response Fund (DERF), please refer to the requirements of ch. NR 169, Wis. Adm. Code for conducting additional site investigation work. Recent revisions to this rule become effective August 1, 2005.

We appreciate your efforts to restore the environment at this site. Because you are continuing in the DERF program, the fees submitted will be applied to your final closure request. If you have any questions regarding this letter, please contact me at (414) 263-8758.

Sincerely,



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

cc: Ed Buc – Arcadis G&M
SER Casefile