



March 15, 2018

Mr. Ralph Hoffman  
14000 North 94th Street, Unit 3092  
Scottsdale, AZ 85260

Subject: WDNR Response to Enviroforensics Response Submittal Dated December 1, 2017, Supplemental Site Investigation Questions, Former Hoffman's Valet Cleaners, 7215 West Center Street, Wauwatosa, WI

FID:241083150  
BRRTS: 02-41-307576

Dear Mr. Hoffman:

The Wisconsin Department of Natural Resources ("DNR") reviewed the, "Response to WDNR Questions Regarding the Supplemental Site Investigation Report", prepared by EnviroForensics, dated December 1, 2017. The DNR reviews environmental cases for compliance with state and federal laws to maintain consistency of these cases. As discussed with Wayne Fassbender of EnviroForensics on February 22, 2017, the DNR is not able to approve the current site investigation submittals because additional requirements must be met. The purpose of this letter is to inform you of the additional work that needs to be completed for the DNR to reconsider whether the Site Investigation is complete.

Please complete the following in addition to the recommended items and submit the results to the DNR for review. A workplan and associated costs should be submitted for approval by the DNR before the additional work is started:

- The site has a vapor mitigation system installed, but system commissioning hasn't been completed. This includes baseline condition requirements under Wisconsin Administrative Code § NR 724.15, and performance verification under Wis. Admin. Code § NR 724.11(7). Commissioning provides the data needed to demonstrate that the vapor pathway has been mitigated or interrupted, which is a requirement for future case closure under Wis. Admin. Code § NR 726.05(8). This should include an indoor air sample in the second-floor residence to determine if there is a current public health issue. Discuss the location of the residence and include on future maps).
- Subslab vapor samples beneath the drycleaning machine/boiler area needs to be completed to define the degree and extent of contamination under Wis. Admin. Code § NR 716.11.
- There currently is not a groundwater monitoring well near the source area (drycleaning machines). The screened intervals of the existing groundwater monitoring wells should be compared to the soil contamination depths and soil types, and groundwater table depths. Evaluate the need for additional monitoring wells and piezometers based on this analysis and present your recommendations.
- Check the sanitary sewer depths for the 7219 and 7209 West Center Street properties relative to groundwater depths and include the sewer locations on all maps showing these properties. Evaluate the potential for vapor migration along these sanitary sewer lines.
- On all cross-sections, indicate intervals sampled for soil, groundwater, and soil gas/subslab vapor.
- Revise the soil sample location interval for GP-3 (Figures 9 and 11) to the proper depth intervals (8 to 10 and 10 to 12-feet) and proper screened interval for MW-2 (10 to 20-feet).
- Revise cross-section Figure 9 (EnviroForensics), to include MW-1 to show the screened interval for groundwater and soil data at the 10 to 12-foot interval that indicates soil contamination in the sand zone from north to south.
- All cross-sections should have the groundwater table level indicated on the maps (Figures 9, 10, and 11).
- On Figure 7, Soil Gas Sample Results (in the box) SG-3 should be renamed SG-4, and SG-1 renamed as SG-2 (in the box).

Hoffman's Valet Cleaners  
7215 West Center St.  
Milwaukee, WI  
FID: 241083150  
BRRTS: 02-41-307576

## Action Items

EnviroForensics is recommending the following action items as part of the site investigation:

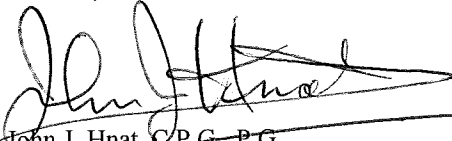
- Replacing the old floor drains at the site (7215 W. Center Street) with a more modern drain that has a better functioning gas seal if property use changes from that of an active dry cleaner using PCE as the cleaning agent. (The DNR recommends changing the drain now since it's unknown when change of use will occur).
- Inspect the basement of 7219 W. Center Street for the locations of reported sumps. If found, the sumps should be sampled for the presence of CVOC vapor concentrations to determine if there is a vapor intrusion risk along with indoor air samples of the two basements. If a vapor intrusion risk is identified, the basement sumps will be fit with a grommited, vapor tight lid, and the need for a SSDS will be reevaluated.
- Perform one additional round of paired indoor air sampling and sub-slab sampling at the 7219 W. Center Street property.
- Collect indoor air samples from the two basement areas and sample vapors in the basement sumps (if present) at the 7219 W. Center Street property.

The requested additional work and action items recommended by EnviroForensics should be submitted for DNR approval with the associated costs as part of the site investigation for the site under the DERF program before work is performed.

Additional work may be required depending on the results of this additional site investigation work.

The DNR appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at the above address or at (414) 263-8644. Please refer to the FID number at the top of this letter in any future correspondence. Future correspondence should be sent directly to the Remediation and Redevelopment Environmental Program Assistant Chue Yee Yang at the address located at the beginning of this letter.

Sincerely,



John J. Hnat, C.P.G., P.G.

Project Manager/Hydrogeologist  
Southeast Region  
Remediation and Redevelopment Program

C: Wayne Fassbender, Enviroforensics  
WDNR SER Files