



September 13, 2017

MS. MARILYN WALSH-BERLIN
W2626 MILEY RD
SHEBOYGAN FALLS, WI 53085

Subject: Response to May 2017 Site Investigation Report
Troy Laundry & Cleaners, 320 Pine St., Sheboygan Falls, Sheboygan County, WI
DNR BRRTS Activity #: 02-60-385641

Dear Ms. Walsh-Berlin:

On May 24, 2017, the Department of Natural Resources ("DNR") received the *Site Investigation Report* dated May 18, 2017 (the "May 2017 SIR") submitted by Environmental Forensic Investigations, Inc. ("EnviroForensics") on your behalf along with the associated \$1,050 review fee in accordance with ch. NR 749, Wisconsin Administrative Code ("Wis. Adm. Code").

After the initial review of the May 2017 SIR, several questions were identified with regard to site features and investigative activities. The DNR provided those questions to EnviroForensics via electronic mail ("e-mail") on August 3, 2017. Answers to those questions were provided in an e-mail response from EnviroForensics on August 14, 2017. The above-referenced e-mail correspondence is attached to this letter.

The DNR performed a technical review of the May 2017 SIR and associated site file to provide this response. The review reveals the following items where requirements of the NR 700 Rule Series are not yet met:

1. Tetrachloroethylene ("PCE") contamination in groundwater identified in grab samples collected from borings GP-5 and B-8 (see attached Figure 2 – Site Layout) have not been verified or collected from a monitoring well that was constructed in accordance with ch. NR 141, Wis. Adm. Code as required under s. NR 726.05(7)(c), Wis. Adm. Code. An additional monitoring well needs to be installed in the vicinity of boring GP-5 to assess contamination concentrations and trends near the source area. Based on the groundwater analytical results obtained from this monitoring well, additional monitoring points maybe required to define the extent of groundwater contamination to the southeast and/or along utility lines.
2. Additional investigation to assess the vapor intrusion pathway is needed to characterize the degree and extent of contaminated vapor directly beneath the building per the requirements of s. NR 716.11(3)(a), Wis. Adm. Code. The vapor intrusion pathway cannot be ruled out based on indoor air samples alone. The PCE concentration measured in soil gas at SG-2 and the likelihood contaminated groundwater is in contact with the building foundation both support the need for additional vapor sampling. A soil gas sampling port and two sub-slab vapor ports are needed to assess vapors beneath the building based on the layout and construction of the inter-connected buildings shown on Figure 2 – Site Layout. The soil gas sampling port needs to be installed within the unfinished floor (i.e., dirt) of the basement. One sub-slab vapor port is needed within the footprint of the single story slab on-grade portion of the building and the second sub-slab vapor port is needed beneath the concrete floor from within the footprint of the basement. A minimum of two

vapor sampling events is needed to adequately assess the potential for contaminant vapors to migrate into the breathing space of the buildings. At least one event should be collected under frost conditions while the heat is running. Resources including fact sheets, videos and template letters are available to assist in gaining access and communicating vapor results to occupants at the following website: <http://dnr.wi.gov/topic/Brownfields/Vapor.html>.

3. In order to assess contaminant trends in the source area and in side- and down-gradient monitoring wells, additional groundwater monitoring is needed. Groundwater sampling needs to continue from the existing monitoring well network on a semiannual basis.

The following comments are presented for preparation of future submittals:

4. No isoconcentration map was submitted with the May 2017 SIR. As stated in s. NR 716.15 (4)(c), Wis. Adm. Code, an isoconcentration map is required and should depict the hazardous substance, concentration, the environmental medium, the date measured and the unit of measurement. Please make sure future submittals contain appropriate isoconcentration maps.
5. It appears that soil borings SB-1 through SB-4 were inadvertently identified as DP-1 through DP-4 on the figures. Please revise on future site maps so there is consistency throughout the document.
6. Photoionization detector ("PID") readings measured at borings SB-1 through SB-4 appear to be extremely high compared to the corresponding soil analytical results. Please review and provide an explanation.
7. The property boundaries as shown on the figures included in the May 2017 SIR do not match what is listed on the Sheboygan County Land Information website. The Sheboygan County Land Information website lists the main building with the basement (Parcel # 59282907080) as 320 Pine Street and the slab-on-grade portion of the building (Parcel # 59282907070) as 326 Pine Street. This is important information that is needed at the time of closure in order to provide proper notifications and continuing obligations for each parcel. This needs to be clarified in the text and figures of future submittals.
8. The Property Information and Property Owner Information in the May 2017 SIR appears incorrect. Based on the information presented on Sheboygan County Land Information website, the property address, parcel number, and the name and address of the property owner do not match what is listed in the May 2017 SIR. Please address this inconsistency in future submittals.
9. For future submittals please explain why there are three deed documents for the property (Document numbers 1433281, 1433282 and 1433283) and confirm that these are the most current available.
10. Table 3 - Summary of Soil Sample Analytical Results should include information that indicates whether soil samples were saturated versus not saturated at the time of collection.
11. Please revise Table 5 - Summary of Soil Gas Sample Analytical Results to show how Vapor Risk Screening Levels were calculated including the date of the WI Vapor Quick Look-Up Table used and the applicable attenuation factor(s).
12. Please include the information contained within the August 3 and August 14, 2017 e-mail correspondences that is attached to this letter in future submittals.

September 13, 2017
Ms. Marilyn Walsh-Berlin
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Additional actions needed:

A brief work plan should be submitted prior to addressing the additional investigation items discussed above. A review fee of \$700 in accordance with ch. NR 749, Wis. Adm. Code should accompany the submittal if a detailed review and written response is requested.

Please note that s. NR 716.14, Wis. Adm. Code requires responsible parties to notify the DNR, property owners (if different than the responsible party), and occupants as appropriate, of sampling results from their relative property within 10 days of receipt of the data unless otherwise approved by the DNR. This timely notification to DNR will be important for the initial round of vapor data and groundwater data from the new monitoring well. If needed, a template notification letter (Form 4400-249) is available on the internet to assist responsible parties with this notification and can be found at the following link: <http://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf>. As stated under item #2 above, additional resources are available to assist in communicating vapor results to occupants.

At the completion of the additional investigation activities, please note that a supplemental site investigation report will need to be submitted to the DNR for review that addresses the items discussed in this letter and includes supporting documentation that has not yet been submitted (e.g., soil boring log, monitoring well construction form, development form, etc.). A review fee of \$1,050 in accordance with ch. NR 749, Wis. Adm. Code should accompany the submittal if a detailed review and written response is requested.

Thank you for the opportunity to review the May 2017 SIR. Please contact me with any questions in Oshkosh by phone at 920-424-7077 or by email at richard.joslin@wisconsin.gov.

Sincerely,



Richard Joslin
Hydrogeologist
Remediation & Redevelopment Program

Attachments:

August 3 and August 14, 2017 e-mail correspondence between DNR and EnviroForensics
Figure 2 – Site Layout dated October 18, 2016

cc: Rob Hoverman, EnviroForensics (email only – rhoverman@enviroforensics.com)
Brian Kappen, EnviroForensics (email only – bkappen@enviroforensics.com)

Joslin, Richard R - DNR

From: Rob Hoverman <RHoverman@enviroforensics.com>
Sent: Monday, August 14, 2017 4:40 PM
To: Joslin, Richard R - DNR
Cc: Brian Kappen; Leah Hurtgen Ziemba (lhziemba@michaelbest.com)
Subject: RE: Former Troy Laundry and Cleaners - BRRTS # 02-60-385641
Attachments: Revised Wooden Washtub Troy Figure (003).pdf

Categories: WORK - Important

Rick,

Here are your comments with our responses. Let me know if you have any questions.

After review of the Site Investigation Report submitted to the Wisconsin Department of Natural Resources for the above-reference site, a few questions came up that I was hoping you could provide some additional information with. My questions are as follows:

- Review of the SI report indicates that groundwater contamination may likely be from a leaky sanitation sewer line from the onsite building to Pine Street. Is there any additional information with regard to the sewer line? *Historically the sewer pipe was cast iron.* Was there a video of the sewer line? *No* Was the line ever replaced? *Yes, Pine Street was redone in 2006-7 and the sewer main was replaced during the project. The cast iron lateral still present in the basement.* Do we know the depth of the sanitary sewer line (and water line that crosses it)? *It leaves the building at approximately 7 ft bgs. The water line is at approximately 6 ft bgs just above the sewer.* Sanitary is I assume that the facility never had a septic tank or drain field, correct? *Correct. No Septic*
- Just want to confirm that the building is currently occupied and still being used as a laundromat and drop location for offsite dry cleaning? *Correct, stopped dry cleaning in 2010. It is a laundry mat and drop shop.*
- I would like additional information with regard to the building construction. The SI report states that the basement floor was half dirt. *The west half of the front half of basement is dirt, so basically ¼ quarter of basement is dirt.* What kind of material is it (i.e., clay, gravel, etc.)? *Unknown, appears to be native soil but covered with pallets to make for level surface.* Can the basement floor material be included on the Site Layout drawing? *Yes, see attached.* Assuming that the other half is made up of concrete what is the condition of that material? *North half is in good shape, front half is older but solid.*
- Is there a sump in the basement and where does it discharge? *There is a sump pit but no pump and the owner has no recollection of pump ever being used.* Does the building contain any floor drains? *No, there is not any indirect connection to main floor plumbing and the subsurface.* Can these items be added to the Site Layout drawing? *No Floor drains are present. The sanitary line is above basement floor grade, i.e., you can physically touch the line and is shown on the attached figure.*
- Do we know where the location of the dumpsters where spent filters may have been thrown in? *The city picked up trash cans at curb: No secondary source area has been identified for a filter disposal scenario that I understand you are asking about.* I see that PCE storage is marked with an "S" on the Site Layout drawing. Is there additional information with regard to storage and/or management of hazardous materials on the property? *That is PCE storage post 1986 where Safety Kleene picked up and dropped off solvents. Modified to show directly behind the dry cleaning machine Pre 1986 there was no storage beyond what was in the dry cleaning machine. The solvent was brought in by hose from truck in front of store.*
- Are there any storm sewers onsite? If so can those be added to the drawing. *No storm sewers, surface runoff is handled by sheet flow to curb storm grates. Shown on figure.*

We are looking forward to moving this forward, please let us know if there is anything else we can do to facilitate a quick closure process.

Rob Hoverman, PG
Regional Manager

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From: Joslin, Richard R - DNR [<mailto:Richard.Joslin@wisconsin.gov>]
Sent: Thursday, August 03, 2017 3:08 PM
To: Brian Kappen <Bkappen@enviroforensics.com>
Subject: Former Troy Laundry and Cleaners - BRRTS # 02-60-385641

Brian

After review of the Site Investigation Report submitted to the Wisconsin Department of Natural Resources for the above-reference site, a few questions came up that I was hoping you could provide some additional information with. My questions are as follows:

- Review of the SI report indicates that groundwater contamination may likely be from a leaky sanitation sewer line from the onsite building to Pine Street. Is there any additional information with regard to the sewer line? Was there a video of the sewer line? Was the line ever replaced? Do we know the depth of the sanitary sewer line (and water line that crosses it)? I assume that the facility never had a septic tank or drain field, correct?
- Just want to confirm that the building is currently occupied and still being used as a laundromat and drop location for offsite dry cleaning?
- I would like additional information with regard to the building construction. The SI report states that the basement floor was half dirt. What kind of material is it (i.e., clay, gravel, etc.)? Can the basement floor material be included on the Site Layout drawing? Assuming that the other half is made up of concrete what is the condition of that material?
- Is there a sump in the basement and where does it discharge? Does the building contain any floor drains? Can these items be added to the Site Layout drawing?

- Do we know where the location of the dumpsters where spent filters may have been thrown in? I see that PCE storage is marked with an “S” on the Site Layout drawing. Is there additional information with regard to storage and/or management of hazardous materials on the property?
- Are there any storm sewers onsite? If so can those be added to the drawing.

We can talk about this if you want. I’m not sure how this should be submitted. Any ideas? Let me know when you are available and we can discuss.

Rick

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Richard R. Joslin

Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau

Wisconsin Department of Natural Resources

625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731

Phone: (920) 424-7077

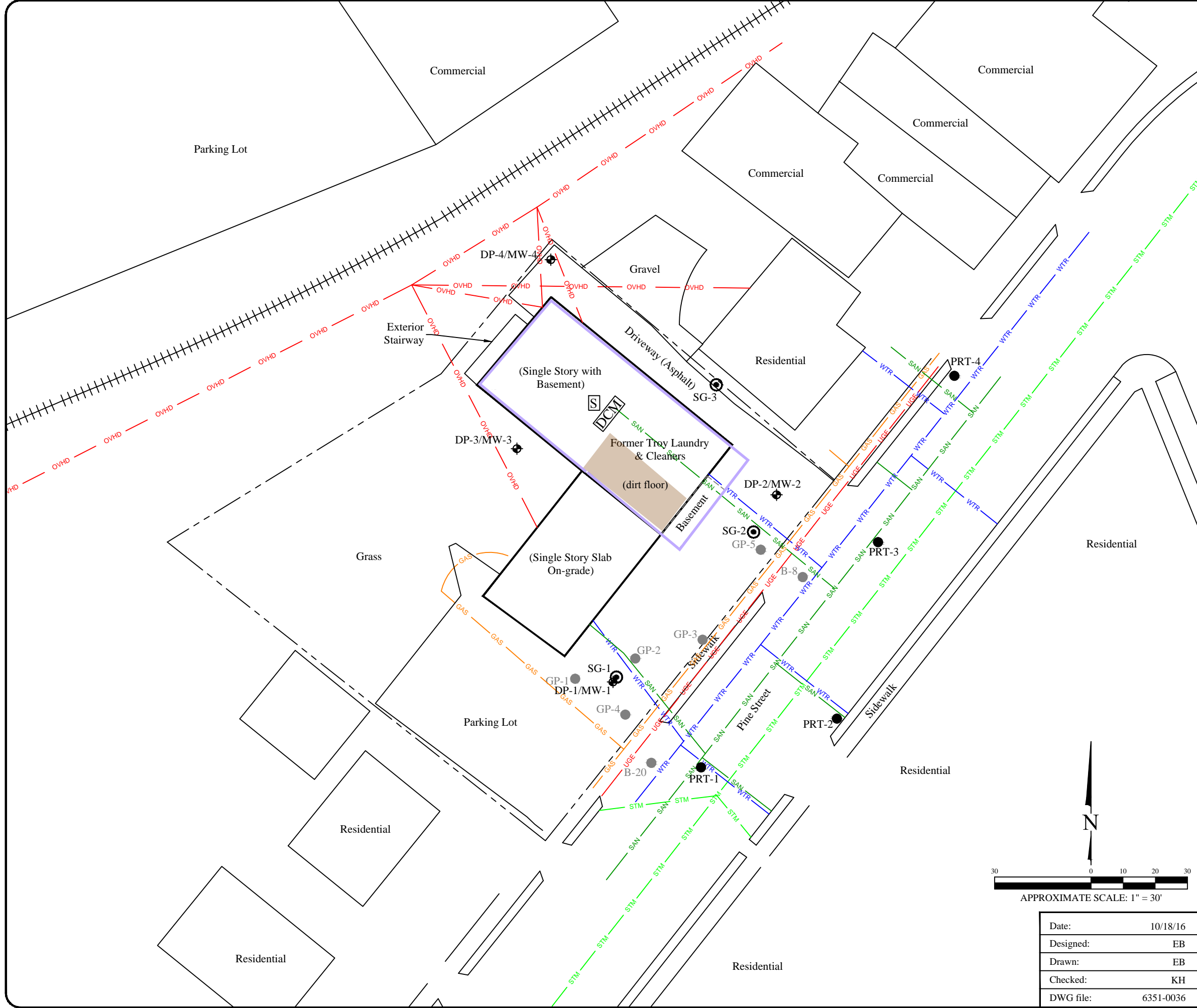
Cell Phone: (920) 360-4291

Richard.Joslin@Wisconsin.gov



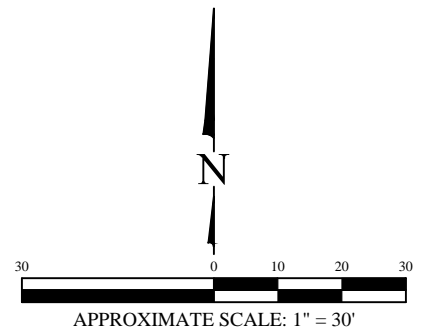
dnr.wi.gov





Legend

- Property boundary
- ++++ Railroad tracks
- SAN --- Underground sanitary utility line
- STM --- Underground storm utility line
- GAS --- Underground gas utility line
- WTR --- Underground water utility line
- OVHD --- Over head electrical utility line
- UGE --- Underground electrical utility line
- GP-1 Soil boring (By Others)
- ⊕ MW-1 Monitoring well
- ⊙ SG-1 Soil Gas sampling point
- PRT-1 PRT soil gas sample boring
- DCM Former dry cleaning machine location
- S Former PCE storage
- Basement Area
- Dirt Floor (in basement)



SITE LAYOUT															
Former Troy Laundry & Cleaners 320 Pine Street Sheboygan Falls, Wisconsin															
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>Date:</td><td>10/18/16</td></tr> <tr><td>Designed:</td><td>EB</td></tr> <tr><td>Drawn:</td><td>EB</td></tr> <tr><td>Checked:</td><td>KH</td></tr> <tr><td>DWG file:</td><td>6351-0036</td></tr> </table>	Date:	10/18/16	Designed:	EB	Drawn:	EB	Checked:	KH	DWG file:	6351-0036	<div style="text-align: center;"> <p>ENVIROforensics ENVIRONMENTAL FORENSIC INVESTIGATIONS, INC. 825 North Capitol Avenue • Indianapolis, IN 46204 EnviroForensics.com</p> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">Figure</td></tr> <tr><td style="text-align: center;">2</td></tr> <tr><td style="text-align: center;">Project</td></tr> <tr><td style="text-align: center;">6351</td></tr> </table>	Figure	2	Project	6351
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