

BRRTS ID No. 02-41-420848

Reviewer: Lee Delcore & Linda Michalets

Review Date: 08/15/2014

Site Name: Express Cleaners Corp

Region: SER

See RR5242 for instructions <http://intranet.dnr.state.wi.us/int/aw/rr/guidance/RR5242.pdf> . Steps with an *denote DNR follow up;

** denote RP/property owner follow up. If auditing a VPLE site, use the applicable LUST or ERP BRRTS number.

File Review:

1. Review the file and BRRTS, identify the following:

Address	City	State	ZIP Code
5620 S 108th St	Hales Corners	WI	53130
County Parcel Identification Number (PIN)	FID Number	Current Property Owner	
6599977004	241462320	Country Fair, LLC	

Original Responsible Person
Milan Liquidating Trust, 30200 Telegraph Rd., Ste. 105, Bingham Farms, MI 48025

Has the property been transferred since the restriction was recorded/condition applied? Yes No

How was site selected for audit? (AC = BRRTS Action Code)

- Vapor Mitigation AC 226
- VPLE with AC 56
- Enforcement Follow-up
- Other: _____
- Green Space Grant AC 605
- AC 220, 222, 224, 228, or 230
- Deed Restriction AC 52 or 696 (LGU)
- Age of Remedy
- Complaint Received
- Regional Priority

Date of: _____

- Final Closure 05/10/2005
- Certificate of Completion _____
- Green Space Grant _____
- Remedial Action Plan Approval _____
- General Liability Clarification Letter _____
- Local Gov't Unit (LGU) Letter _____

*Select all continuing obligations applied (at case closure or RAP approval or letter to LGU):

Add to BRRTS	Action Code (AC) in BRRTS	AC	AC Meaning
		51	Deed notice
		52	Deed restriction for soil
		730	Groundwater use restriction
		95	Deed instrument conditions met (for audits, use if deed restriction was updated by filing a deed notice)
		101	GIS Registry PDF modified - date DNR letter sent
		104	Site removed from GIS Registry - date DNR letter sent
		696	Continuing obligation required of LGU to maintain liability exemption
		605	Green Space Grant awarded (deed restriction)
		<input checked="" type="checkbox"/> 56	Continuing Obligation applied (use with codes 220-238)
		220	Soil at industrial use level
		<input checked="" type="checkbox"/> 222	Cover/engineered containment system (pavement, soil cover, etc.)
<input checked="" type="checkbox"/>		224	Structural impediment (buildings or other structures)
		<input checked="" type="checkbox"/> 226	Vapor mitigation/response
		228	Site-specific (identify in comment field)
		230	LGU was directed to take a protective action
		<input checked="" type="checkbox"/> 232	Residual soil contamination > RCLs/SS RCLs (use with AC 222, 224)
		234	Monitoring well needs to be abandoned
		236	Site closed with groundwater contamination > ES

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Add to BRRTS	Action Code (AC) in BRRTS	AC	AC Meaning
		238	Maintenance and inspection documentation required to be submitted
X		185	Closure Compliance Review completed
X		186	Closure Compliance Review - RP follow up needed
		187	Closure Compliance Review follow up completed
		99	use this code with comments, for actions not listed under AC 186

Describe any site-specific requirements that the site owner and/or responsible party needed to address:

Is the site on the GIS Registry? Yes No - *Add it to the GIS Registry**

Were neighboring properties affected? Yes No

If yes, are these properties listed on the GIS Registry and in BRRTS? Yes No - *Update the GIS Registry/BRRTS, use form 4400-246**

Was a maintenance plan required at closure? Yes No NA

Is it in the file or PDF or missing?

If no maintenance plan was required, offer the property owner the template model with inspection log, and note in the follow up section of the audit that one was provided on the audit date

Was/were the appropriate restriction(s) recorded with the Register of Deeds? Yes No NA

Has a restriction been amended, or been nullified by DNR? Yes No

If yes, was BRRTS updated? (95) Yes No*

Was the GIS Registry PDF updated? Yes No*

Site Visit:

2. Contact the site owner for access.

3. Walk the site (ideally with the owner or responsible party) to review the site conditions against the conditions documented at closure/other to verify or change answers to questions in #1.

4. With the site owner/RP (if possible), answer the following for DNR RR records:

Did the site owner know about the continuing obligation(s)? Yes No

Have site conditions changed since closure that would affect either a deed restriction or other restrictions or requirements associated with the site? Yes No

If yes, explain:

Examples: 1) a building has been razed and investigation and remediation occurred. 2.) excavation or residential development has occurred in a restricted area.

Has a pavement (asphalt or concrete) cover, soil cover or other sort of cover, such as a building, been removed or is it in disrepair? Yes No/NA

Should it be replaced or repaired? Yes No

If a performance standard was the final remedy, has it been altered? Yes No

If yes, explain:

New vent pipe and manometer installed as a result of last CO audit - Fall 2012

If yes, was the DNR notified? Yes No

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Have local zoning changes occurred since closure? Yes No/NA

If yes, does it appear to impact the effectiveness of the restriction? Yes No

If yes, describe:

Is soil sampling needed to determine if the final remedy has been modified such that a direct contact threat exists? Yes No

If yes, describe:

For example, an asphalt cover has been removed or is in disrepair, or a new contaminated site is present upgradient, etc.

Has additional monitoring or remediation been done since the site was closed? Yes No

If yes, describe:

Does a new threat to public health or the environment exist (e.g. new sources or exposure routes)? Yes No

If yes, does sampling need to be performed? Yes No

If yes, describe what should be done to address the problem, and by whom:

Is the vapor mitigation system or sub-slab depressurization system (SSDS) operating as designed? (pressure gradient being maintained) Yes No NA

If no, describe any follow up needed.

Unknown - need to secure access to the "employee only" room to view new system components - will have building manager acquire access and provide picture of manometer as follow-up. DNR auditors and the property maintenance representative were denied access to this area during the site visit.

Have any of the exposure assumptions used for closure changed at this site? Yes No NA

If yes, describe any follow up needed.

Has the land use at this site changed such that a vapor intrusion pathway may now exist? Yes No

If yes, describe any follow up needed.

COMPLIANCE AND FOLLOW-UP:

5. Identify compliance and any follow up needed.

Is the site in compliance with the continuing obligations/closure approval document? Yes No

If no, describe what's not in compliance and the reasons for noncompliance:

No evidence was provided that semi-annual inspections were being conducted. A Inspection & Maintenance Log 4400-305 was filled out during inspection, but addition photographs are necessary to gain compliance.

May depend on extent of non-compliance, non-maintenance of remedy or changed ownership or conditions. If case is out of compliance, it should be prioritized by the region, for new casework or enforcement, as needed.

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Has the maintenance agreement required at closure been followed? Yes No NA

If no, describe:

The Continuing Obligations Inspection and Maintenance Log has not been completed semi-annually, as was required in the Deed Restriction and Cap Maintenance and Vapor Barrier Maintenance Plan, recorded at the Milwaukee County register of Deeds on April 20, 2005.

6. ****Are additional actions by the RP property owner warranted at the site? *The intent is to return the site to compliance with continuing obligation. If further remedial action is needed, determine if the site meets the NR 726 reopening criteria.*** Yes No

If yes, describe any actions needed to return the site to compliance and identify who is responsible:

Provide department photo-documentation of roof vent components and manometer readings for areas that were inaccessible during inspection.

Add AC 186, use AC 99 for actions not listed under AC 186.

7. ***Does the site require follow up by DNR?** Yes No

contact or enforcement to return site to compliance with continuing obligation

updating the GIS Registry (adding or modifying a packet)

reopen site (add ACs 186 and 13)

other: Letter requesting photo documentation of new manometer and roof vent

8. ***Attach photographs of the site, documenting site conditions. Label the photos with the site name/BRRTS Activity number/date/view. If a follow-up letter is sent, include a copy with the audit. (audit/photos/follow-up letter)**

9. ***Save a copy of the audit using the following naming convention:
BRRTS#_COAUDIT_Year.pdf (example: 0365001149_COAUDIT_2008.pdf).**

10. **Update applicable BRRTS action codes on the Table on page 1. Send a copy of the audit to your Regional EPA for updating ACs and uploading the PDF into BRRTS.**

11. ***Add a PDF copy of this audit to the case file. Send a copy electronically (PDF) to Central Office.**

Interior and Exterior Pictures from August 15, 2014 Continuing Obligation Audit of Express Cleaners at 5620 S 108th Street, Hales Corners, WI – BRRTS #02-41-420848



Interior facing North



Exterior facing South



Interior facing South



Exterior facing Southeast



Interior Facing Northeast

Interior and Exterior Pictures from August 15, 2014 Continuing Obligation Audit of Express Cleaners at 5620 S 108th Street, Hales Corners, WI – BRRTS #02-41-420848



Passive vent room at distance



Passive vent room vent pipe



Passive vent room closer



Passive vent room vent pipe close-up



Passive vent room w/exposed epoxy floor