



July 19, 2018

Trevor Nobile
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53121

**Re: Hazardous Waste Exemption Request for Soil Disposal
Former Packard Way Cleaners
3650-3652 East Barnard Avenue
Cudahy, Wisconsin 53110
BRRTS# 02-41-515150**

Dear Mr. Nobile:

EnviroForensics, LLC (EnviroForensics) is providing this Hazardous Waste Exemption Request on behalf of the former Packard Way Cleaners located at 3650-3652 East Barnard Avenue in Cudahy, Wisconsin. EnviroForensics is requesting Wisconsin Department of Natural Resources (WDNR) approval to dispose soil impacted with tetrachloroethene (PCE) and trichloroethene (TCE) that will be generated during remedial activities in a Subtitle D landfill. The source of the impacts are related to the historic dry cleaning operations; therefore, the soil may contain a listed waste per NR 600.

The WDNR's health based direct contact Residual Contaminant Levels (RCLs) for PCE and TCE in soil are 153 mg/kg and 8.8 mg/kg, respectively. As outlined in the attached Table 1, the concentrations of PCE and TCE detected within the area proposed for excavation are below the referenced RCLs. Therefore, EnviroForensics requests a Hazardous Waste exemption, permitting the disposal of soil from the Site impacted by PCE and TCE from the Site within a Subtitle D landfill.

This hazardous waste exemption request is being submitted as a supplement to the Site Investigation Update and Interim Remedial Action Plan dated June 5, 2018 in which a technical review fee was included.

If you have any questions or comments regarding this request, please call the Rob Hoverman, at 262-510-0612 or email at rhoverman@enviroforensics.com.

Sincerely,
EnviroForensics, LLC

A handwritten signature in blue ink, appearing to read "Rob Hoverman".

Robert R. Hoverman, PG
Senior Project Manager

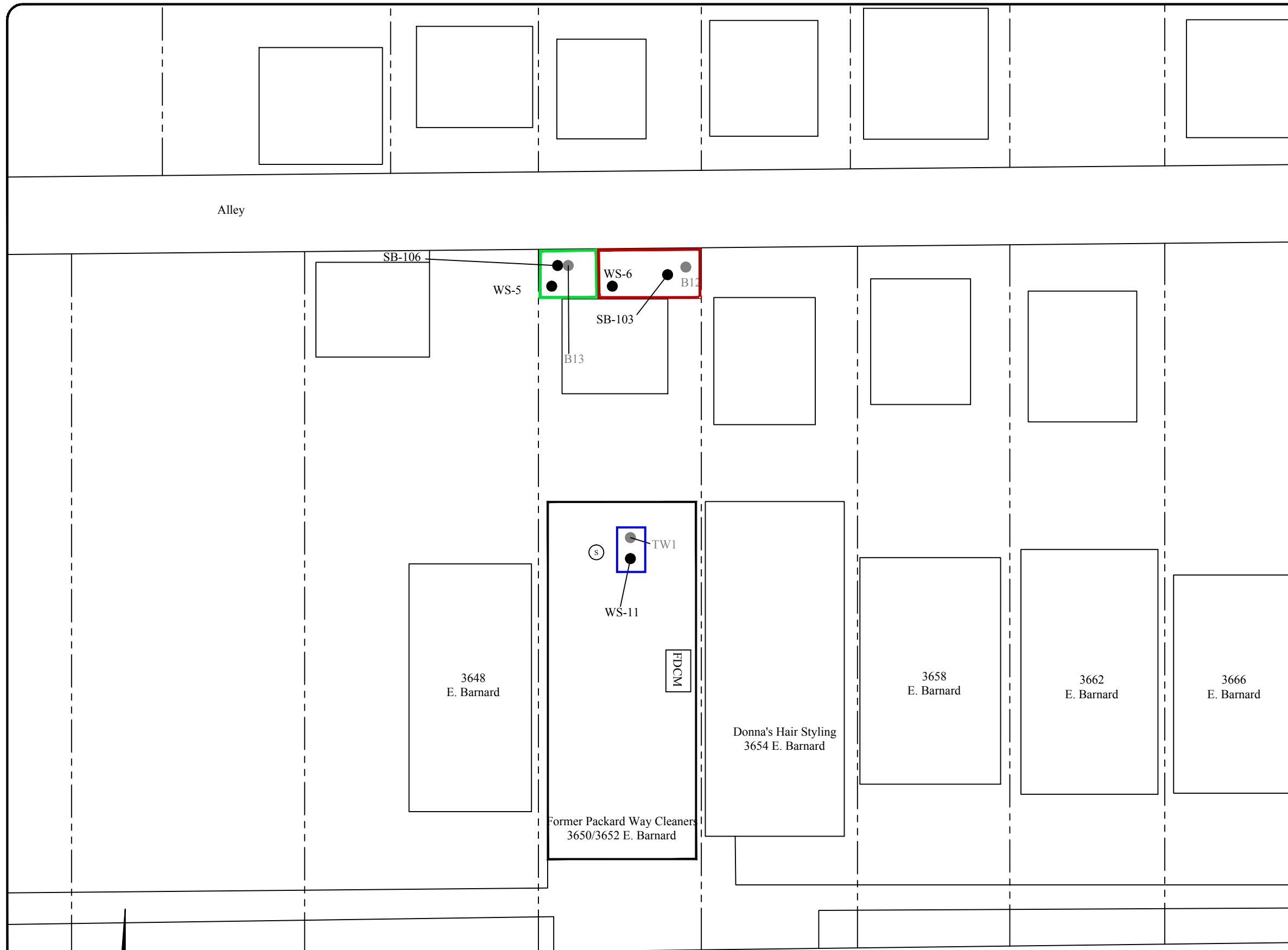
Enclosures

Document: 6306-0396
EnviroForensics, LLC
N16 W23390 Stone Ridge Dr, Suite G, Waukesha, WI 53188
Phone: 262-290-4001 • Fax 317-972-7875

Legend

- WS-1 ● Waste Characterizaion Soil Sample Location
- B1 ● Soil boring location (By Others)
- Property boundary
- ⊙ Sump
- FDCM Former dry cleaning machine location

- Proposed excavation area to 5 feet bgs
- Proposed excavation area to 6 feet bgs
- Proposed excavation area to 8 feet bgs



Alley

SB-106

WS-5

WS-6

B12

SB-103

B13

S

TW1

WS-11

FDCM

3648
E. Barnard

Donna's Hair Styling
3654 E. Barnard

3658
E. Barnard

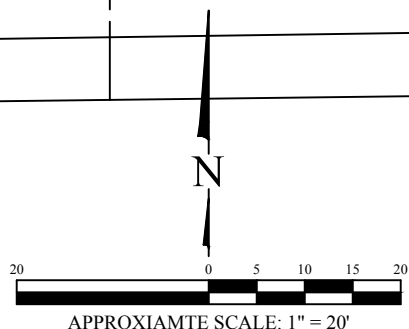
3662
E. Barnard

3666
E. Barnard

Former Packard Way Cleaners
3650/3652 E. Barnard

PROPOSED EXCAVATION EXTENT MAP

Former Packard Way Cleaners
3650/3652 East Barnard Avenue
Cudahy, Wisconsin



East Barnard Avenue

Date:	2/15/18
Designed:	EB
Drawn:	EB
Checked:	RH
DWG file:	6306-0352

825 North Capitol Avenue • Indianapolis, IN 46204
EnviroForensics.com

Figure	4
Project	6306

TABLE 3
SOIL ANALYTICAL RESULTS
Packard Way, Ltd.
3650-3652 East Barnard Avenue
Cudahy, WI

Boring Identification	Date Sampled	Depth	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	trans-1,2_Dichloroethene	1,1-Dichloroethene	1,2,4- Trimethylbenzene	n-Butylbenzene	Bis(2-ethylhexyl)phthalate
Industrial RCL ¹			145,000	8,410	2,340,000	1,850,000	1,190,000	219,000	108,000	164,000
Non-Industrial RCL ¹			33,000	1,300	156,000	1,560,000	320,000	219,000	108,000	38,800
Soil to Goundwater RCL ¹			4.5	3.6	41.2	62.6	5	1,382	NE	NE
TW1	7/20/2004	0.5-2	11,100	210	<35	<28	<22	<35	<40	<40.5
		4.5-5	21,500	538	<33	<28	<22	51	<40	<40.5
B12	8/23/2004	2-4	37,701	<34	<34	<28	<22	<34	<40	<40.5
		8-10	1,430	309	<33	<28	<22	<33	<40	<40.5
B13/TW4	8/23/2004	2-4	6,850	199	<35	<28	<22	<35	<40	<40.5
		6-8	26,400	1,720	<34	<28	<22	<34	<40	<40.5
SB-103	05/13/15	12	1,300	77 J	<21	<28	<22	<78	<40	<40.5
SB-106	05/13/15	10	2,170	640	33 J	<28	<22	<78	<40	<40.5
	05/13/15	14	3,600	700	29.7 J	<28	<22	<78	<40	<40.5
	5/13/2015	30	<54	<42	<21	<28	<22	<78	<40	<40.5
WS-5	12/7/2017	5-6	14,500	77 J	<32	<28	<22	<25	<40	<40.5
		9-10	36 J	<41	<32	<28	<22	<25	<40	<40.5
WS-6	12/7/2017	6-7	2,060	<41	<32	<28	<22	<25	<40	<40.5
		9-10	41 J	68 J	<32	<28	<22	<25	<40	<40.5
WS-11	12/7/2017	1-2	17,700	1,590	38 J	<28	28.9	<25	<40	<40.5
		5-6	420	<41	<32	<28	<22	<25	<40	<40.5

Notes:

Residual contaminant level are based on USEPA Soil Screening Levels (December 2017)

Samples analyzed using EPA SW-846 Method 8260 with Prep Method 5030B

All concentrations reported in units of micrograms per kilogram (µg/kg)

Bolded and Shaded green values exceed the WDNR generic Non-Industrial Residual Contaminant Levels

Bolded and Shaded blue values exceed the WDNR generic Soil to Groundwater Residual Contaminant Levels

Bolded values are above detection limits

J = Concentration is less than the reporting limit but greater than the method detection limit.