



April 23, 2021

Ms. Susan Doolin  
Packard Way Cleaners, Former  
5601 S. Pennsylvania Ave.  
Cudahy, WI 53110

SUBJECT: Review of *Work Scope and Request for DERF Change Order*  
Former Packard Way Cleaners, 3650-3652 E. Barnard Avenue, Cudahy, Wisconsin 53110  
BRRTS#: 02-41-515150; FID#: 0241490920

Dear Ms. Doolin:

On March 25, 2021, the Wisconsin Department of Natural Resources (DNR) reviewed a report titled *Work Scope and Request for DERF Change Order* (SIWP), dated February 3, 2021 for the Former Packard Way Cleaners, 3650-3652 E. Barnard Avenue, Cudahy, WI 53110 (Property). The SIWP was prepared on your behalf by your consultant, EnviroForensics, LLC (EnviroForensics), and was submitted under the Drycleaner Environmental Response Fund (DERF) for DNR review and response.

### **Background**

Soil, groundwater, and vapor contaminated with chlorinated volatile organic compounds (CVOCs) associated with the former dry-cleaning operation at the Property have been identified both onsite and offsite of the Property. The SIWP identifies additional impacts offsite to the east of the Property and proposed the installation of soil boring SB-125 offsite to the east and the installation of an NR 141 compliant groundwater monitoring well, MW-11, which includes a shortened filter pack at the SB-125 location. Additionally, the SIWP proposed three subslab vapor and indoor air sampling events offsite at 3663 W. Squire Avenue, Cudahy, WI.

### **SIWP Review**

The DNR reviewed the SIWP for compliance with Wis. Admin. Code §§ NR 716.07 and 716.09. Based on the evaluation of the currently available information, the DNR proposes expanding the SIWP and provides the following comments:

#### Groundwater

- Collect groundwater elevation measurements from all existing groundwater wells to determine groundwater flow direction at the Property.
- Utilize the groundwater flow direction data from the elevation measurement event to determine if groundwater flow is further to the north than depicted in the SIWP. Utilize this data to determine the proposed groundwater monitoring well placement location.

- Groundwater monitoring wells without an established sampling trend of at least three rounds of groundwater sampling events should be sampled until a trend is established to help determine the degree of groundwater impacts onsite and offsite at the Property.
- The SIWP requested a variance of the NR 141 groundwater monitoring well installation requirements to include a shortened screen and subsequent filter pack. The DNR concurs with this request but requests hydrated granular bentonite be used when sealing the groundwater monitoring well after installation.

#### Vapor

- The SIWP including additional analytical data from the most recent site investigation sampling events. The analytical data included elevated concentrations of CVOCs in the shallow soil in the alley. Due to the elevated concentrations of CVOCs in the shallow soil, a vapor screening evaluation should be conducted for 3655 E. Squire Ave, 3667 E. Squire Ave, 3662 E. Barnard Ave, 3666 E. Barnard Ave, 3674 E. Barnard Ave, and 3677 E. Squire Ave.
- In 2018, the DNR assisted in attempting to gain access to some neighboring properties for sampling purposes. At the time access was not granted. Ensure no change in ownership or access permission has occurred since the previous access attempts.
- If not previously submitted, provide the commissioning information for the subslab vapor mitigation system at the Property and the adjacent 3654 E. Barnard Ave. If commissioning activities have not taken place previously, conduct commissioning activities to demonstrate the mitigation systems are operating adequately. Guidance related to mitigation system commissioning can be found in Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin (RR-800).

#### Other

- Provide a discussion and make a determination regarding the sewer utilities in S. Kirkwood Ave being a preferential pathway for contaminant migration.
- Discuss whether the sump at the Property is still in use.
- If not already done, provide notification of contamination to the Rights-of-Way (ROW) holders for the alley and S. Kirkwood Ave.
- The DNR is requiring an emerging contaminant scoping evaluation for all sites. Provide an emerging contaminant scoping evaluation including 1-4 dioxane and Per- and polyfluoroalkyl substances (PFAS).

Note that the site investigation is an iterative process. Additional sampling may indicate that further assessment is needed to define the degree and extent of contamination in all affected media.

#### Next Steps

The DNR requests an updated Site Investigation Work Plan to address the above comments be submitted within 60 days of the date of this letter per Wis. Admin. Code § NR 716.09.

Once the Site Investigation is complete, the DNR requests a comprehensive Site Investigation Report summarizing all findings at the Property be submitted within 60 days of the completion of the Site Investigation per Wis. Admin. Code § NR 716.15(1).

The DNR appreciates the actions taken to restore the environment at this site. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414)-750-7140 or at [issac.ross@wisconsin.gov](mailto:issac.ross@wisconsin.gov).

Sincerely,



Issac A. Ross  
Project Manager – Hydrogeologist Adv.  
Remediation and Redevelopment Program  
Southeast Region, Milwaukee

cc: Rob Hoverman, EnviroForensics, LLC (electornic)