



August 25, 2020

Ms. Bailey Copeland
Fox Run 3, LLC
c/o VJS Development Group
W233N2847 Roundy Circle West
Pewaukee, WI 53072

Subject: Review of Work Plan for Additional Investigative Services
Klinke Cleaners Fox Run at 2346 W St. Paul Avenue, Waukesha
DNR BRRTS Activity #: 02-68-535535; FID #: 268188910

Dear Ms. Copeland:

The Department of Natural Resources (DNR) has completed its review of the July 24, 2020 “Work Plan for Additional Investigative Services” (WP) prepared by Endpoint Solutions Corp for the site identified above. The DNR concurs that of the actions outlined in work plan should be completed with the following considerations and modifications:

Soil investigation and assessment

- Two borings are proposed to be advanced along the east side of the former 2340 tenant space to determine where contamination poses a direct contract risk. To DNR requests that these borings be advanced on the western portion of the 2340 tenant space instead to better define the extent of the impacted area. You should consider staggering the borings, so that one is advanced further from the source than the other, as this could help to demonstrate that the extent is defined.
- Two soil borings are proposed to be advanced southwest of the former Klinke space. Collecting soil samples from only the western-most boring location may be enough to define soil contamination in this area (depending on the sample results).
- Additional soil samples must be collected to define the western extent of contamination identified at GP-6.

Groundwater investigation

- Additional groundwater samples must be collected from within the former Klinke tenant space. A new monitoring well should be installed near GP-1 to continue assessing groundwater in this area.
- Two soil borings are proposed to be advanced southwest of the former Klinke space. Collecting groundwater samples from only the western-most boring location may be enough to define soil contamination in this area (depending on the sample results).
- The easternmost boring of the two proposed to be advanced in the sewer backfill should be collected closer to MW-5 where the highest concentrations of groundwater contaminants were identified.
- The DNR cannot evaluate the need to install a piezometer within the Klinke tenant space without being provided with the requested cross-sections and an assessment of how geology may limit vertical migration in this area. Installing a monitoring well at GP-1 to determine the stratigraphy in that location and to demonstrate contaminant concentrations within the source area may provide useful information for assessing the potential for vertical contaminant migration. You may consider collecting soil samples

from below the water table near GP-1 to assess the potential for vertical migration. You may also consider foregoing the assessment and installing a piezometer.

Vapor assessment

- It is unclear what information collecting vapor samples from the proposed soil probes would provide. The DNR could not use these samples to confirm or rule out the need to operate a vapor mitigation system at the nearby residential buildings.
- DNR guidance document RR-800 recommends that when assessing vapor intrusion at multi-family residential buildings that sub-slab vapor samples be collected at a rate of one sample per 2,000 square feet of building. Collecting one sub-slab sample from each of these buildings may confirm the need to mitigate but will not provide enough evidence to rule-out a vapor intrusion risk.
- If needed for vapor mitigation, the garage ventilation systems should be designed and commissioned following DNR guidance.

After conducting the proposed actions you will need to evaluate whether additional sampling is needed to complete the site investigation and if any further remedial actions will be required. We appreciate your efforts to protect the environment at this site. If you have any questions regarding this request, please contact me by calling (262) 574-2166, or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Robert Cigale, Endpoint Solutions Corp., 6871 South Lovers Lane, Franklin, WI 53132
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