



July 1, 2022

Ms. Bailey Copeland
Fox Run 3, LLC
c/o VJS Development Group
W233N2847 Roundy Circle West
Pewaukee, WI 53072
Email only to: bcopeland@vjsdevelopment.com

Subject: Review of the “Soil Vapor Sampling Work Plan”, “Groundwater Monitoring Report”, and “Construction Documentation Report”
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 “Soil Vapor Sampling Work Plan”, “Groundwater Monitoring Report”, and the “Construction Documentation Report”, each dated May 24, 2022, and other documentation submitted previously for the Klinke Cleaners Fox Run site. These reports document the results of recent groundwater sampling and the on-site management of contaminated soil. Collecting additional groundwater and sub-slab samples is proposed. A review of the information provided in the reports and the sampling plan was requested. As outlined below, the DNR is requesting more extensive groundwater sampling than what was proposed and an evaluation on the need for vapor sampling in other areas of the site. The DNR also recognizes that contaminated soil reused on-site was managed appropriately and in accordance with prior approvals.

Groundwater investigation

As the surface cover throughout the area impacted by the tetrachloroethene discharge and the groundwater flow direction have changed significantly from when the investigation began the DNR is requesting more extensive groundwater sampling than what was proposed to confirm plume stability and assess vapor risk. Monitoring wells MW-2, MW-5, MW-6, MW-13, MW-14, and MW-15 should be replaced (where necessary) and sampled on a quarterly basis until contaminant concentrations and flow direction are confirmed. This may require more than the two rounds of sampling proposed in the “Groundwater Monitoring Report”. These wells are positioned to confirm the down gradient extent of contamination, determine if the removal of pavement in areas with higher contaminant concentrations has resulted in increasing groundwater contaminant concentrations, and verify that groundwater contamination concentrations upgradient of the new apartment buildings are stable.

As noted below, the potential for vapor intrusion to impact the westernmost apartment building must be assessed using current site data. If a vapor intrusion risk cannot be ruled out than the installation and sampling of an additional groundwater well would be warranted. This well could be placed either near the location of the former MW-12 or at an alternative location that demonstrates the separation between the contaminant plume and this building.

DNR approval is not required to abandon monitoring wells. However, we do not recommend abandoning any monitoring wells on this site until the groundwater investigation is complete. Wells not proposed to be sampled can provide groundwater depth measurements to confirm flow direction. They may later be needed for sampling, depending on how the groundwater investigation develops.

Vapor investigation and assessment

The DNR generally concurs with the sampling plan for assessing conditions at the two apartment buildings south of the former drycleaner location. We do request the following modifications be incorporated into the plan:

- The westernmost soil vapor probe proposed to be collected from the western building should instead be collected at a more central portion of the building (so the 4 sampling points would form the corners of a square). Collecting a sample from a location from within the center of the building is expected to provide an accurate measure of vapor contamination. The proposed sample locations at the eastern building are acceptable.
- At least two rounds of sub-slab sampling will be needed to confirm that contaminant concentrations do not exceed a vapor risk screening level and there is no need to require vapor mitigation. Conducting one sampling event during the summer and one in winter is expected to provide the most representative data and is the preferred means to conduct this assessment.

An updated vapor assessment must be provided that discusses the need to collect samples from other areas of the site including within the storm sewer pipe near the contaminant plume, from within or along other utilities, and within the westernmost apartment building. This discussion should consider the vapor screening criteria outlined in DNR guidance document RR-800, "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin" and also include an assessment of recently collected groundwater analytical results, current groundwater flow direction, information on building constructing including how the buildings are sealed (especially at the base of the elevator shafts) and utility locations. Providing an updated cross section figure depicting a new building, the new storm sewer line, and the current groundwater table is recommended to support this assessment.

Documentation of material management

The "Construction Documentation Report" demonstrated how contaminated soil containing a hazardous waste was excavated and relocated within the area of contamination (AOC). The excavation and reuse of this soil was conducted in accordance with the proposed remedial action plan approved by the DNR on April 5, 2021.

Future submittals to the DNR

Updated site investigation work plans may be provided if you would like written input from the DNR on proposed actions prior to initiating further field investigation. Once the items outlined in this letter are addressed a site addendum report should be prepared and provided to the DNR for review. A review fee may be provided with this document if you would want the DNR to provide recommendations for completing the site investigation (if needed) or for taking next steps to complete this project. Analytical results must be provided to the DNR within ten days of receipt.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this review or wish to discuss any of these requests in further detail, please contact me by calling (414) 405-0764, or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Robert Cigale, Endpoint Solutions Corp. - bob@endpointcorporation.com