

BRRTS ID No. 02-41-543523

Reviewer: Linda Michalets, Lee Delcore

Review Date: 08/13/2014

Site Name: Jomblee, Inc. (Keith's Cleaners)

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 7027 W. North Avenue		City Wauwatosa	State WI	ZIP Code 53213
County Parcel Identification Number (PIN) 344017200	FID Number 241085680	Current Property Owner Jomblee, Inc.		
Original Responsible Person Robert Reuschlein				

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

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

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Vapor Mitigation AC 226 | <input type="checkbox"/> Green Space Grant AC 605 | <input type="checkbox"/> Age of Remedy |
| <input type="checkbox"/> VPLE with AC 56 | <input type="checkbox"/> AC 220, 222, 224, 228, or 230 | <input type="checkbox"/> Complaint Received |
| <input type="checkbox"/> Enforcement Follow-up | <input type="checkbox"/> Deed Restriction AC 52 or 696 (LGU) | <input type="checkbox"/> Regional Priority |
| <input type="checkbox"/> Other: _____ | | |

Date of: _____

- | | |
|---|---|
| <input checked="" type="checkbox"/> Final Closure <u>11/13/2009</u> | <input type="checkbox"/> Remedial Action Plan Approval _____ |
| <input type="checkbox"/> Certificate of Completion _____ | <input type="checkbox"/> General Liability Clarification Letter _____ |
| <input type="checkbox"/> Green Space Grant _____ | <input type="checkbox"/> 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 (<i>for audits, use if deed restriction was updated by filing a deed notice</i>)
		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 (<i>use with codes 220-238</i>)
		220	Soil at industrial use level
	<input checked="" type="checkbox"/>	222	Cover/engineered containment system (<i>pavement, soil cover, etc.</i>)
		224	Structural impediment (<i>buildings or other structures</i>)
	<input checked="" type="checkbox"/>	226	Vapor mitigation/response
<input checked="" type="checkbox"/>		228	Site-specific (<i>identify in comment field</i>)
		230	LGU was directed to take a protective action
	<input checked="" type="checkbox"/>	232	Residual soil contamination > RCLs/SS RCLs (<i>use with AC 222, 224</i>)
		234	Monitoring well needs to be abandoned
	<input checked="" type="checkbox"/>	236	Site closed with groundwater contamination > ES

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Add to BRRTS	Action Code (AC) in BRRTS	AC	AC Meaning
	X	238	Maintenance and inspection documentation required to be submitted
	X	185	Closure Compliance Review completed
		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:
The new Inspection Form 4400-305, was filled out with the manager and added to file. Continue to submit annually.

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:

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.

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:

An annual inspection log was not submitted to DNR annually at the time of inspection. Site brought back into compliance during the inspection by filling out Inspection & Maintenance Log 4400-305 during the inspection. The completed form has been added to the file. Notified the manager of this continuing requirement, and the owner in a follow-up letter.

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 Cap and Mitigation System Inspection Log has not been submitted annually, as was required in the DNR's Final Case Closure with Continuing Obligations letter, dated November 13, 2009, and the Pavement Cover and Barrier Maintenance Plan and Subslab Mitigation System and Vapor Barrier Maintenance Plan, dated July 27, 2009.

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:

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: _____

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).**

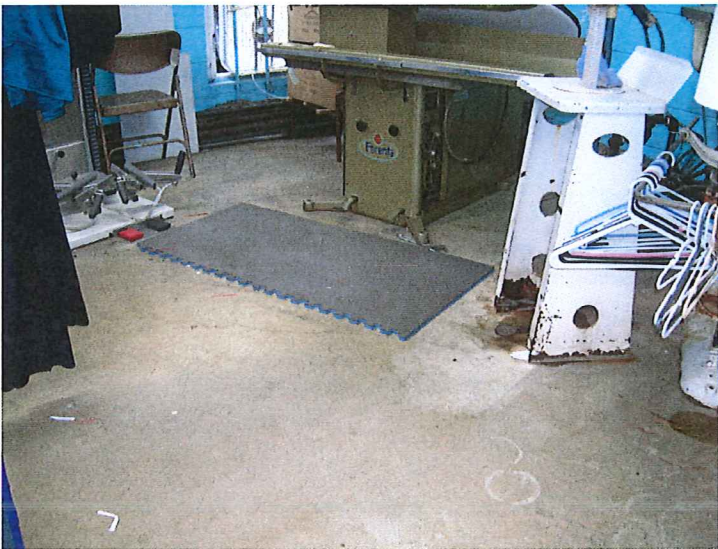
10. **Update applicable BRRTS action codes on the Table on page 1. Send a copy of the audit to your Regional EPA for updating ACs and uploading the PDF into BRRTS.**

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

Jomblee, Inc. (Keith's Cleaners)
BRRS 02-41-543523 and BRRS 03-41-543524
Photographs taken on August 13, 2014



Vacuum-measuring site tube in the back room - southwest corner of the building



Concrete floor – facing southwest from the front of the facility



Pavement cover – facing southwest from the northeast corner of the property

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee, WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



August 15, 2014

Mr. Robert Reuschlein
Jomblee, Inc.
4930 Ascot Lane
Madison, WI 53711

SUBJECT: Site Visit for Continuing Obligation Audit
7027 W. North Avenue, Wauwatosa, WI 53213
FID #241085680 BRRTS #02-41-543523 and #03-41-543524

Dear Mr. Reuschlein:

On August 13, 2014, Wisconsin Department of Natural Resources (DNR) representatives Linda Michalets and Lee Delcore met with Keith Klabunde, the owner of Keith's Cleaners, at the site identified above to inspect the continuing obligations that have been implemented on your property. We provided Mr. Klabunde with a copy of the DNR's November 13, 2009 closure letter and the DNR's new Continuing Obligations Inspection and Maintenance Log (Form 4400-305).

This site was a former gasoline station that has operated for years as a dry cleaning facility. The three petroleum underground storage tanks (USTs) (one waste oil and two gasoline), were removed from in front of the building in 2005. Soil and groundwater at the site were impacted with volatile organic compounds (VOCs) from petroleum and dry cleaning solvents at concentrations greater than residual contaminant levels for soil and enforcement standards for groundwater. Remedial actions on the site included removing the UST sources and verifying that natural attenuation processes were occurring through groundwater monitoring. The site was granted closure on November 13, 2009, with continuing obligations.

As a condition of closure, a Pavement Cover and Building Barrier Maintenance Plan and Subslab Mitigation System and Vapor Barrier Maintenance Plan (copy enclosed) was developed and approved to 1) minimize the infiltration of water into soil and prevent additional groundwater contamination; 2) prevent human contact with residual soil contamination; and 3) prevent VOC vapors from entering the building. The Plan requires annual inspection of the pavement, concrete floor and subslab vapor depressurization system, and documentation of repairs, which are to be recorded on the inspection log and submitted to the DNR annually.

During the DNR visit, it was determined that the pavement cap, concrete floor and sub-slab depressurization system at your property are in good condition, and the site is in compliance with applicable site closure criteria. Records of inspections, however, were not being documented and submitted to the DNR annually as required. Mr. Klabunde was given a copy of the DNR's new Continuing Obligations Inspection and Maintenance Log (Form 4400-305) to complete annually. The first annual inspection was completed and submitted to the DNR during our visit (copy and photos enclosed for your records). In the future, the form can be filled out on-line at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf> and emailed to David Hanson, Environmental Program Associate, at David.Hanson@wisconsin.gov to be tracked and added to the case file.

In the future, it is recommended that any maintenance or repair activities be recorded on Form 4400-305 as they are completed. The form allows you to fill in the date and actions completed and save it to your computer to keep a log of actions completed during the year.

A copy of the Remediation & Redevelopment Continuing Obligation Review Form, documenting the audit of your site, is enclosed for your records. Thank you for your continued efforts to protect Wisconsin's environment. If you have any questions, please contact me by phone at (414) 263-8757 or e-mail at Linda.Michalets@wisconsin.gov.

Sincerely,



Linda M. Michalets
Hydrogeologist
Remediation and Redevelopment Program

Enclosures: Pavement Cover and Building Barrier Maintenance Plan and Subslab Mitigation System and Vapor Barrier Maintenance Plan (July 27, 2009)
DNR Form 4400-305 for August 13, 2014 inspection with photos
Remediation & Redevelopment Continuing Obligation Review Form 4400-232

cc: Mr. Keith Klabunde, Keith's Cleaners (with enclosures)
Mr. Lee Delcore, DNR

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Jomblee, Inc. BRRTS No 02-41-543523
03-41-543524

Inspections are required to be conducted (see closure approval letter):
 annually
 semi-annually
 other - specify _____

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):
david.hanson@wisconsin.gov

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
8/13	Keith	<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:	pavement repair 2013 Good	none	<input type="radio"/> Y <input checked="" type="radio"/> N	<input type="radio"/> Y <input checked="" type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N