



September 21, 2016

Fehr Graham
Attn: Kendrick Ebbott
1237 Pilgrim Road
Plymouth, WI 53073

Subject: Proposed Additional Investigation and Remedial Actions Dated July 6, 2016, Master Dry Cleaners, 6326 West Bluemound Road Wauwatosa, WI

FID: 241398630
BRRTS: 02-41-545142

Dear Mr. Ebbott:

The DNR has reviewed Fehr Graham's Proposed Additional Investigation and Remedial Action (July 16, 2016) in response to our letter dated May 2, 2016. Listed below are the DNR's comments and recommendations on this proposal:

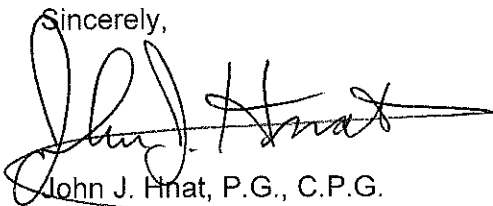
- In the DNR's letter of May 2, 2016, a soil gas evaluation to assess the potential for vapor intrusion into the Milwaukee Police Association building located at 6310 West Bluemound Road was discussed. Include the soil gas evaluation in the additional investigation proposal.
- In order for the DNR to provide a written determination on the threshold values discussed in Attachment B, a "other technical assistance" fee of \$700 in accordance with s. 292.55(1)(b), Stats., and application must be submitted to the DNR. The DNR's document, "*Guidance for Hazardous Waste Remediation, RR-705, January 2014*", may help you in this determination. In addition, provide the DNR with the completed form 4430-019 (Remediation Site Hazardous Waste Determination). The form and fee are required before the DNR can review the Hazardous Waste Determination. **NOTE:** threshold values would have to also pass TCLP limits, not one or the other as stated on Page 8, under Task G of the proposal.
- Verify performance of the installed mitigation system after start-up:
 - Evaluate if there is a negative pressure field extension for over the entire area to be mitigated, not just in the former sump area.
 - Complete a minimum of three monitoring events, with at least one in the summer and one in the winter to evaluate seasonal effects.
 - If this system does not provide sufficient vacuum beneath the floor slab, then modification to the existing system or an additional system will have to be installed. (A negative pressure differential of at least -0.004 in-H₂O is typically used to demonstrate sufficient vacuum.)
 - Conduct indoor air sampling using following criteria:
 - Analyze only for constituents of concern (PCE, TCE, vinyl chloride)
 - Sample at least once after restoration of the building floor before occupancy, and

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- Sample at least once within 6 months after, occupancy.
 - If indoor air Vapor Action Levels are exceeded, a response action will be necessary.
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- If, under Task F assessment of utility corridors, excavation is warranted, then what are the criteria to complete the excavation? In other words, what residual concentration value(s) will be used to determine whether to leave chlorinated solvent soil contamination in-place instead of removal to a licensed landfill for non-hazardous waste?
 - It's not clear where confirmation samples are to be collected for the sump area (HA-2 and possibly the HA-1 area) and along the sanitary sewer both inside and outside the building. Usually a "box-like" dig (sump area) would include the four walls and one or two bottom samples (depends on the size of the "box"). For the sanitary sewer lateral, both walls and bottom samples along the length of the lateral will be necessary to sufficiently characterize residual soil contamination left-in-place. Seepage into the surrounding soil depends on the soil characteristics which more than likely might not be uniform but variable. Submit confirmation sampling locations for both areas in more detail. The proposed locations may be modified (increase or decrease sampling locations) depending on the results of the assessment of the utility corridors in Task F.

The Department appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at the above address or at (414) 263-8644. Please refer to the FID number at the top of this letter in any future correspondence. Future correspondence should be sent directly to me at the above address.

Sincerely,



John J. Hnat, P.G., C.P.G.
Project Manager Hydrogeologist
Southeast Region
Remediation and Redevelopment

C: Harold and Tom Shipshock – Master Dry Cleaning, 6326 W Bluemound Road, Wauwatosa, WI
Don Gallo and Michelle Williams – Husch Blackwell, LLP
Doris Pelc – email, pelskal@hotmail.com
WDNR SER Files