

From: [Hnat, John J - DNR](#)
To: [Alessi, Timothy G - DNR](#); [Mylotta, Pamela A - DNR](#); [Amungwafor, Binyoti - DNR](#)
Subject: RE: Master Drycleaners injection project
Date: Friday, July 10, 2020 4:04:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

I should be back by then.

From: Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Sent: Friday, July 10, 2020 3:51 PM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>; Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>
Subject: RE: Master Drycleaners injection project

I'm good for a meeting Monday. I'm pretty booked but we can book over my time from 12:30-2 if needed. Thanks and have a good weekend everyone.

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Timothy G. Alessi, P.G.

Phone: 414-263-8563

timothy.alessi@wisconsin.gov

From: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Sent: Friday, July 10, 2020 3:48 PM
To: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>
Subject: RE: Master Drycleaners injection project

I have a doc appointment at 930. Probably will last a couple of hours.

From: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Sent: Friday, July 10, 2020 3:36 PM
To: Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>
Cc: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Subject: Master Drycleaners injection project

Hi Tim and Binyoti,

Jay and I have been talking to Dillon Plamann from Fehr-Graham about the Master Drycleaners site (02-41-545142), which is a DERF site. The history is a little complicated. Binyoti issued an injection

approval back in 2015 and Fehr Graham carried out the planned injection. The approval was good for 5 years, but required that they get “WDNR” approval if they needed to change anything – injection points, amount/type of injection materials. So, in 2018, they submitted a change order to Jay to extend their injection project. The change order was approved, but they did not go back to Binyoti for an “official” revision to their 2015 injection approval. I think our language in those approvals (template language) could be misinterpreted regarding getting DNR approval for changes. I think they assumed that Jay’s change order approval, which is also a de facto remedial action proposal approval, was sufficient.

So they did not carry out the extended injection proposed back in 2018, and are just now going forward with it. We might not have known this, had they not just requested another DERF change order for the increased cost of the injection materials (cost increase since 2018). The consultant had folks lined up to do the work on July 13, but he has put it on hold to make sure we are ok with the changes to the injection approved in 2015. I suggested he send Binyoti, (copy me and Jay) an email explaining what they are doing and how it compares to the originally approved work, and he should also look at the 2015 approval letter from Binyoti to see if the conditions are still acceptable/applicable for this current work plan. He is supposed to also explain how the proposed injectate compares to what they used originally, as well as their injection rates, etc. He will also include a copy of the 2015 proposal, which is also in BRRTS. I’m including the 2015 approval letter (also in BRRTS) for your easy reference.

May I suggest that we (Tim, Binyoti, Jay and I) get together on Monday to discuss this, after everyone receives the email from Dillon? Then we can talk about what we think they need to get from us at this point, and what kind of timeframe we would have for providing any needed approvals. Dillon informs me that the injection materials are probably good for another month, but he’s not sure the contractors can even get back to the site within the month, he still has to get them rescheduled.

Thanks for your time on this. Talk to you Monday?
Pam

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Pamela A. Mylotta

Southeast Region Team Supervisor – Remediation & Redevelopment Program
Wisconsin Department of Natural Resources

Cell Phone: (414) 374-2423

pamela.mylotta@wisconsin.gov



From: [Hnat, John J - DNR](#)
To: [Dillon Plamann](#)
Cc: [Mylotta, Pamela A - DNR](#)
Subject: RE: Master Dry Cleaning: Injection Permit
Date: Friday, July 10, 2020 2:38:00 PM

Did you send anything to him asking the request? If not, then it has to be completed. We need the documentation for the record.

From: Dillon Plamann <DPlamann@fehr-graham.com>
Sent: Friday, July 10, 2020 2:36 PM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Subject: RE: Master Dry Cleaning: Injection Permit

John,

I cannot find one in our files, so yes.

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, WI 53081
P: 920.453.0700
C: 920.946.2407
fehr-graham.com

From: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Sent: Friday, July 10, 2020 2:35 PM
To: Dillon Plamann <DPlamann@fehr-graham.com>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Subject: RE: Master Dry Cleaning: Injection Permit

Then you need an extension from Binyoti, correct?

From: Dillon Plamann <DPlamann@fehr-graham.com>
Sent: Friday, July 10, 2020 2:32 PM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Subject: RE: Master Dry Cleaning: Injection Permit

John,

Attached is what I have in our files as far as the extension goes. Please let me know if there is anything else you need.

Thank you!

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, WI 53081
P: 920.453.0700
C: 920.946.2407
fehr-graham.com

From: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Sent: Friday, July 10, 2020 2:25 PM
To: Dillon Plamann <DPlamann@fehr-graham.com>
Cc: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Subject: Master Dry Cleaning: Injection Permit

Dillon,

Do you have copies of the emails you sent to Binyoti requesting an extension of the injection permit, or a letter? If you do, send me the copies. Thanks.



J. Hnat, C.P.G., P.G.

Project Manager/Hydrogeologist

Remediation and Redevelopment Program

Southeast Region Headquarters

Wisconsin Department of Natural Resources

(☎) **phone:** (414) 263-8644, **temporary cell:** (414) 881-0523

(☎) **fax:** (414) 263-8550

(✉) **e-mail:** John.Hnat@wisconsin.gov

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dnr.wi.gov



From: [Hnat, John J - DNR](#)
To: [Mylotta, Pamela A - DNR](#)
Subject: RE: Master DC
Date: Friday, July 10, 2020 2:17:00 PM
Attachments: [20151118_64 Injection Permit Appr.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image007.png](#)
[image009.png](#)

Here's the one from 2015.

From: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Sent: Friday, July 10, 2020 2:03 PM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Subject: Master DC

Hi Jay,

I do not see any injection request in BRRTS. Can you send me anything that verifies Binyoti received this request? Why isn't it in BRRTS?

Pam

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Pamela A. Mylotta

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Cell Phone: (414) 374-2423

pamela.mylotta@wisconsin.gov





November 18, 2015

Mr. Harold Shipshock
Master Dry-cleaning Inc.
6326 Bluemound Road
Wauwatosa, WI 53213

Subject: Temporary Injection Exemption Request for Master Cleaners, Remediation
6326 Bluemound Road, Wauwatosa WI 53213, BRRTS # 0241-545142, FID # 241398630

Dear Mr. Shipshock:

The purpose of this letter is to provide a temporary exemption for the injection of a remedial material into groundwater. On October 7, 2015 the Wisconsin Department of Natural Resources (WDNR) received a request for a temporary exemption to pressure inject a solution of 20-25% by weight of Provect-IR Antimethanogenic ISCR Reagent into groundwater at the Master Cleaners Remediation, 6326 Bluemound Road, Wisconsin, WI 53213. The request was submitted by FEHR GRAHAM ENGINEERING & ENVIRONMENTAL, the project's environmental consultant, who is representing the Master Cleaners including the submission of a \$700 review fee. FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. also made a request for a WPDES General Permit for Contaminated Groundwater for Remedial Action Operations at the site. A WDNR injection approval and a WPDES permit are required prior to the injection of remedial materials into the subsurface. This temporary exemption provides assurance to the City of Wauwatosa that the Provect-IR Antimethanogenic ISCR Reagent proposed environmental cleanup conforms to s. 292.12, Wis. Stats. WDNR approved the Remedial Action of this site on March 17, 2015

FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. proposes an in-situ injection of a Provect-IR Antimethanogenic ISCR Reagent to the subsurface at a proposed 24 soil injection borings. Each boring will receive about 100 to 150 gallons of solution. The solution is 40 % iron, 2-4 % calcium dipropionate and organic carbon. The total volume to be injected is 3,200 pounds of product and approximately 2,000 gallons of water.

Determination on the NR 812 Injection Prohibitions:

The injection prohibition under s. NR 812.05, Wis. Adm. Code, is not applicable in this case because the proposed action is a WDNR-approved activity necessary for the remediation of groundwater. This letter serves as your approval from the WDNR to inject Provect-IR Antimethanogenic ISCR Reagent to treat CVOCs, including PCE, trichloroethylene (TCE), and breakdown products, cis-1, 2-dichloroethene (cis-1, 2-DCE) and vinyl chloride (VC) in groundwater, in accordance with this temporary exemption.

NR 140 Temporary Exemptions:

WDNR approval is hereby granted to the FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. for the injection of Provect-IR Antimethanogenic ISCR Reagent at the Master Cleaners, 6326 Bluemound Road,

Wauwatosa, Wisconsin with certain terms and conditions. The expiration date of this temporary exemption must be less than 5 years, per NR 140.28(5) (e) 1. from the date of this letter.

The need to obtain a temporary exemption for the injection of a remedial material for which a groundwater quality standard has not been established is required under s. NR 140.28 (1) (d), Wis. Adm. Code. Based on the information provided by your consultant, it appears the requirements for a temporary exemption for the injection of a remedial material for which a groundwater quality has not been established under s. NR 140.28 (1) (d) have been or will be met in accordance with s. NR 140.28 (5) (c) and (d), Wis. Adm. Code.

Department approval is granted with the following terms and conditions:

A. General:

1. The remedial action for restoring contaminated groundwater or soil, and any infiltrated or injected contaminated water and remedial materials, shall achieve the applicable response objectives required by s. NR 140.24 (2) or s. NR 140.26 (2), Wis. Adm. Code, within a reasonable period of time.
2. The type, concentration and volume of substances or remedial material to be infiltrated or injected shall be minimized to the extent that is necessary for restoration of the contaminated groundwater.
3. Any infiltration or injection of contaminated water or remedial material into groundwater shall not significantly increase the threat to public health, or welfare, or to the environment.
4. No uncontaminated or contaminated groundwater, substance or remedial material shall be infiltrated or injected into an area where a floating non-aqueous liquid is present in the contaminated groundwater.
5. There shall be no expansion of soil or groundwater contamination, or migration of any infiltrated or injected contaminated water or remedial material, beyond the edge of previously contaminated areas, except that infiltration or injection into previously uncontaminated areas may be allowed if the Department determines that expansion into adjacent, previously uncontaminated areas is necessary for the restoration of the contaminated groundwater, and the requirements of s. NR 140.18 (1), Wis. Adm. Code will be met.
6. All necessary federal, state and local licenses, permits and other approvals are obtained and compliance with all applicable environmental protection requirements is required. A WPDES general permit for Discharge of Contaminated Groundwater from Remedial Action Operations is required for this action.

B. Specific:

7. The remedial materials to be injected to the groundwater shall be limited to Provect-IR Antimethanogenic ISCR Reagent solution.
8. The remedial material and injection project shall be as described in FEHR GRAHAM ENGINEERING & ENVIRONMENTAL.'s October 7, 2015 request.
9. FEHR GRAHAM ENGINEERING & ENVIRONMENTA shall notify the Southeast Region WDNR project manager of field activities no less than one (1) week before starting the injection.
10. Include soil vapor screening, using a PID, as a best management practice as part of the monitoring plan.
11. Remediation progress reports shall be submitted semi-annually, and shall include the groundwater Monitoring results. The first report should be submitted not more than three months after the first injection. Recommendations as to the next phase of sampling and/or the need for additional treatment shall be included in a future report. This report shall be submitted prior to the expiration date of this temporary approval.
12. Any significant changes to the injection process, based on information from the injection groundwater Monitoring reports or results shall be submitted to the WDNR for approval prior to the changes being Implemented at the Master Cleaners, 6326 Bluemound Road, Wauwatosa. This includes, but is not Limited to, adjustments to the volume/mass of the media injected, additional injection points, number of Injection/delivery events, and/or changes in the type of remediation media used in the injection points.

13. Modifications to the sampling schedule may be requested.
14. The responsible party may apply to the WDNR for an extension of this approval in the event that future injection/delivery activities are required, and the WDNR must receive any extension request before the expiration date of this approval.
15. The WDNR will review all permit extension requests, site-specific data and or any other necessary information.
16. Upon completion of the project, the placement monitoring wells must be abandoned in accordance with s. NR 141.25, Wis. Adm. Code, and later topped off with grout or native soils if settling occurs, unless converted to NR141 complying monitoring wells, or through an alternative approved by the WDNR Project Manager.

Monitoring Conditions: In addition to your plan, it is your responsibility to meet all of the following approval conditions during and related to your proposed infiltration/injection procedures at this site. The conditions are:

1. Maintain and follow the Site Specific Health and Safety Plan in accordance with the Occupation Safety and Health Administration (OSHA) and the United States Environmental Protection Agency (USEPA) health and safety standards for hazardous waste workers.
2. If a chlorinated water source (i.e. municipal water) is used as the make-up water, it shall be filtered through an activated carbon filter or method proposed in your report to remove chlorine.
3. Record the start and stop times and the actual volume of Provect-IR Antimethanogenic ISCR Reagent solution injected into each Injection or delivered to each placement monitoring well.
4. Monitor the ambient air in and around the work area during the Provect-IR Antimethanogenic ISCR Reagent solution injection.
5. Monitor the headspace of all injection points prior to each Provect-IR Antimethanogenic ISCR Reagent injection
6. Monitor the headspace of all groundwater monitoring wells prior to each groundwater monitoring event.
7. Conduct vapor monitoring at the closest proposed monitoring well locations, including a measurement of percent (%) LEL every 15 minutes during the first hour of each infiltration event.
8. Immediately notify the WDNR if any new groundwater quality enforcement standards are exceeded during monitoring.
9. Notify digger's hotline and all owners of utility-lines if your project requires this. Also notify the local fire department prior to injection activities, and ensure that any representatives of these entities be allowed to observe the injection activities, as needed after completing the injection, sample all monitoring wells for applicable parameters quarterly.
10. Ensure that the injection is performed at less than 100 psi at a rate which minimizes solution mounding in the aquifer, and plume disfigurement.
11. Maintain a log of all field monitoring results and injection/delivering activities.
12. Document and report all project activities and all test results to the WDNR within 60 days of completing the injection activities.

See Appendix 1 for additional conditions regarding the use of aggressive oxidants, if this is applicable to your site.

Failure to adhere to the provisions of this temporary exemption may result in WDNR requiring revisions to the remedial action design, operation or monitoring procedures, or the revocation of this exemption and the implementation of an alternative remedial action to restore soil or groundwater quality, or both.

WPDES Permit

Your proposed discharge is eligible for coverage under the general Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remedial Action Operations/Construction Site Storm Water Runoff Permit No. WI-S067831-04. You are responsible for compliance with the conditions contained in this permit. The permit and an accompanying facts sheet can be downloaded from the WDNR website at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>. The amended water will be injected into the groundwater. No pollutants shall be injected into the groundwater.

Discharges under this permit are required to be consistent with a discharge management plan that has been approved by the WDNR. Your plan, FEHR GRAHAM ENGINEERING & ENVIRONMENTAL's October 7, 2015 request will be considered as the required discharge management plan, which specifies analytical sampling of the discharge for VOC and RCRA Metals.

Treatment will be provided by injection/delivering of Provect-IR Antimethanogenic ISCR Reagent to groundwater. The facility must immediately notify the WDNR if any treated groundwater will be discharged to surface water. Any significant system changes will require WDNR approval.

The WDNR hereby authorizes your pollutant discharge under the general WPDES permit for Discharge of Contaminated Groundwater from Remedial Action Operations (WI-0046566-6). The following conditions are highlighted for your information:

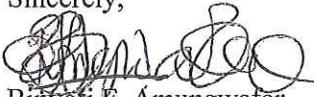
Section 283.35, Wisconsin Statutes, authorizes the WDNR to issue general permits for discharges from categories or classes of point sources. If a permittee believes coverage of a facility under a general WPDES permit is not appropriate, the permittee may apply for issuance of an individual WPDES permit pursuant to section 283.35 (2) and may petition the WDNR for withdrawal of coverage under the general permit. The individual permit application should indicate which site specific factors would justify alternate WPDES limits for the operation. Issuance of such a site specific WPDES permit will provide for a 30 day public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. The WDNR may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the WDNR may refer any violation of this permit to the Department of Justice for enforcement under s. 283.89, Stats. In order to avoid any enforcement action, please read the WPDES permit carefully and comply with the permit requirements.

If you believe you have a right to challenge the WDNR's decision to cover this facility with a WPDES general permit, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review WDNR decisions must be filed. To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the WDNR, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Such a petition should identify pollutant(s) that are believed to be not appropriately regulated by the general permit for the specific site. All requests for contested case hearings must be made in accordance with section NR 2.05 (5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the time period for filing a petition for judicial review.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the WDNR, to file your petition with the appropriate circuit court and serve the petition on the WDNR. A petition for judicial review must name the Department of Natural Resources as the respondent.

If you have any questions regarding this letter, please contact either me at 414-263-8607 or BinyotiAmungwafor@Wisconsin.gov

Sincerely,



Binyoti F. Amungwafor

Hydrogeologist

Remediation & Redevelopment Program

Cc: Mr. Kendrick A. Ebbott, FEHR GRAHAM ENGINEERING & ENVIRONMENTAL

Mr. Bryan Hartsook, -WDNR Water Resources Engineer

Mr. Brian Austin, WDNR DG/5

Mr. Bill Phelps, WDNR DG/5

Case File

Appendix 1

System and Well Construction, Installation and Abandonment:

1. That the direct injection holes and vapor monitoring points must be constructed as proposed in FEHR GRAHAM ENGINEERING & ENVIRONMENTAL's October 7, 2015 Report.
2. That the system configuration in the Work Plan must be installed and operated as proposed.

System Operation, Maintenance and Inspection:

1. That exclusion zones must be established for the facility during the entire injection process. This means that special safety measures should be taken within these areas.

Monitoring Schedules:

RR – Remedial Action Monitoring:

1. That the actual volume injected be recorded on an hourly basis for each day of the project.
2. That baseline monitoring be performed for the following groundwater parameters: VOCs, RCRA Metals, color, pH, conductivity, methane, ethane/ethene, total organic carbon (TOC), dissolved iron and manganese, sulfate, dissolved oxygen and oxygen reduction potential (ORP) in wells at your site
3. That during the injection, water table monitoring points of wells on your site shall be monitored hourly for the first hour after injection and every 2 hours thereafter during the injection, unless injection is occurring down that monitoring point.
4. That if any water table change of two (1) foot or greater increase occurs at any site monitoring points representing potential migration routes toward nearby building foundations and buried utility and sewer conduits (identified above) then:
 - Cease injection operations completely
 - Evaluate cause of water table change
 - Implement measures, to return the subsurface water table to acceptable levels.
 - Increase monitoring frequency. Rotate between monitoring points in the immediate vicinity of the monitoring point where the elevated water table was detected.
5. That baseline monitoring be performed for vapors, including VOCs using a PID and methane using a landfill gas meter of wells on your site
6. That during injection, vapor monitoring must be done every hour for the first 2 hours, then four times daily for the application duration if measurements remain near background at the locations listed in 6.

Wastewater WPDES monitoring:

7. That after completion of the injection phase of the remedial action, all existing monitoring wells and the chosen injection wells are sampled for the parameters listed in 2 above (baseline monitoring).
8. That after completion of the injection phase, quarterly monitoring shall continue for one year from injection completion, with sample collection and analysis completed according to items 2 and 6 above and the requirements of the accompanying WPDES discharge permit for this site.

Required Response Measures:

1. That if 10% of LEL is reached at any time and at any monitoring point:
 - a. cease injection operations immediately
 - b. evaluate cause of vapors
 - c. implement measures to reduce the vapor concentration to acceptable levels
 - d. increase monitoring frequency. Rotate between monitoring points in the immediate vicinity of the monitoring point where the elevated level was detected.
2. That if vapor levels are detected at or above 10% of the LEL within any building or within 20 feet of the building:

- a. evacuate persons from the building
- b. shut down all electrical power
- c. vent buildings by opening all doors and windows
- d. follow measures in #1.

Notification Requirements:

1. That in the event that sustained exceedances of the 10% of LEL is present for more than 30 minutes, or if 25% of LEL is reached at any time and at any monitoring point, then immediate notification of the local fire department is required.
2. That the Department be notified immediately of system breakdown or shutdown.
3. That the Department be notified immediately of any new or major increase (10-fold change) of groundwater quality enforcement standard exceedances in the water quality monitoring program.
4. That all owners of utilities and the local fire department and the WDNR Project Manager (John Hnat) be notified prior to injection activities and that representatives of each of these entities be allowed to observe the injection activities.

From: [Hnat, John J - DNR](#)
To: [Amungwafor, Binyoti - DNR](#)
Subject: Master Dry Cleaners Injection Permit
Date: Friday, July 10, 2020 1:56:00 PM
Importance: High

Hi Binyoti,

Dillon Plamann has been trying to reach you in order to reissue or extend the injection permit from November 15, 2015. Is there any way this can be done as soon as possible so they can work on the site? Here's his phone number 920-946-2407. I can't authorize this. Thanks and stay safe.

 *J. Hnat, C.P.G., P.G.*

Project Manager/Hydrogeologist

Remediation and Redevelopment Program

Southeast Region Headquarters

Wisconsin Department of Natural Resources

(☎) **phone:** (414) 263-8644, **temporary cell:** (414) 881-0523

(☎) **fax:** (414) 263-8550

(✉) **e-mail:** John.Hnat@wisconsin.gov

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From: [Hnat, John J - DNR](#)
To: [Mylotta, Pamela A - DNR](#)
Subject: RE: Master
Date: Thursday, July 9, 2020 3:29:28 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)

He can't get a hold of Binyoti to amend the injection approval for Master Dry Cleaners. The time has just run out on his approval letter from Binyoti and the consultant needs an extension in order to start the injection. He's making sure everything's in order before he starts.

From: Mylotta, Pamela A - DNR <Pamela.Mylotta@wisconsin.gov>
Sent: Thursday, July 9, 2020 3:25 PM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Subject: Master

John,
Why are you directing this consultant to me?
Pam

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Pamela A. Mylotta

Southeast Region Team Supervisor – Remediation & Redevelopment Program
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From: [Dillon Plamann](#)
To: [Mylotta, Pamela A - DNR](#)
Cc: [Hnat, John J - DNR](#)
Subject: RE: Master Drycleaners, BRRTS #02-41-545142, FID 241398630
Date: Thursday, July 9, 2020 3:01:23 PM
Attachments: [20151118_64_Injection_Permit_Appr.pdf](#)
[20181015_112_DERP_Change_Order.pdf](#)

Hi Pam,

I am working with John on a remedial injection at Master Drycleaners in Wauwatosa. The driller and chemical contractor are available next week Monday to Wednesday (7/13 – 7/15) to complete the injection. I just want to make sure everything is covered prior to starting the injection.

I have attached the permit that was issued in November 2015 for a prior injection at the site, and they appear to still be eligible for this round of injection that was approved in the attached Change Order.

When you have a chance, could you please review and let me know if there is anything further that needs to be done prior to the injection? I know this is short notice, so I apologize for that.

John mentioned that you have meetings most of the afternoon. I will try giving you a call around 4:45 to discuss if you are available. Otherwise feel free to call me on my cell number below if you have time before that.

Thank you!

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, WI 53081
P: 920.453.0700
C: 920.946.2407
fehr-graham.com

From: Dillon Plamann
Sent: Wednesday, July 08, 2020 9:57 AM
To: Amungwafor, Binyoti - DNR <Binyoti.Amungwafor@wisconsin.gov>; Hopfensperger, Alan A - DNR <Alan.Hopfensperger@wisconsin.gov>
Subject: RE: Master Drycleaners, BRRTS #02-41-545142, FID 241398630

Good morning Binyoti and Alan,

I was informed by John to contact you both as the issuers of the attached injection permits.

Based on the communications I have found with the project (see attached Approved Change Order

#4, Task 103 for scope), it appears these permits still apply for the additional injection at the site. The permits were issued in November 2015.

Please review and let me know if there is anything further that needs to be done prior to the injection. The driller and chemical contractor are available next week (July 13-15) to complete the scope and we would like to keep the project moving forward. If you would like to call and discuss, please call my cell phone number below.

Thank you very much for your time and assistance.

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, WI 53081
P: 920.453.0700
C: 920.946.2407
fehr-graham.com

From: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Sent: Wednesday, July 08, 2020 9:44 AM
To: Dillon Plamann <DPlamann@fehr-graham.com>
Subject: RE: Master Drycleaners, BRRTS #02-41-545142, FID 241398630

Since I'm not the one that issued these letters, you should contact them with your question(s).

From: Dillon Plamann <DPlamann@fehr-graham.com>
Sent: Wednesday, July 8, 2020 9:25 AM
To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>
Subject: RE: Master Drycleaners, BRRTS #02-41-545142, FID 241398630

Hi John,

I am putting everything together for the injection next week, and I want to be sure that we are covered under the attached WPDES injection permit. We are within the 5 year window from the original date the permit was issued (11/18/2015).

Please let me know as soon as you can if there is anything further that needs to be done with the permit.

Thank you,

DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

909 North 8th Street, Suite 101
Sheboygan, WI 53081
P: 920.453.0700
C: 920.946.2407
fehr-graham.com



November 18, 2015

Mr. Harold Shipshock
Master Dry-cleaning Inc.
6326 Bluemound Road
Wauwatosa, WI 53213

Subject: Temporary Injection Exemption Request for Master Cleaners, Remediation
6326 Bluemound Road, Wauwatosa WI 53213, BRRTS # 0241-545142, FID # 241398630

Dear Mr. Shipshock:

The purpose of this letter is to provide a temporary exemption for the injection of a remedial material into groundwater. On October 7, 2015 the Wisconsin Department of Natural Resources (WDNR) received a request for a temporary exemption to pressure inject a solution of 20-25% by weight of Provect-IR Antimethanogenic ISCR Reagent into groundwater at the Master Cleaners Remediation, 6326 Bluemound Road, Wisconsin, WI 53213. The request was submitted by FEHR GRAHAM ENGINEERING & ENVIRONMENTAL, the project's environmental consultant, who is representing the Master Cleaners including the submission of a \$700 review fee. FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. also made a request for a WPDES General Permit for Contaminated Groundwater for Remedial Action Operations at the site. A WDNR injection approval and a WPDES permit are required prior to the injection of remedial materials into the subsurface. This temporary exemption provides assurance to the City of Wauwatosa that the Provect-IR Antimethanogenic ISCR Reagent proposed environmental cleanup conforms to s. 292.12, Wis. Stats. WDNR approved the Remedial Action of this site on March 17, 2015

FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. proposes an in-situ injection of a Provect-IR Antimethanogenic ISCR Reagent to the subsurface at a proposed 24 soil injection borings. Each boring will receive about 100 to 150 gallons of solution. The solution is 40 % iron, 2-4 % calcium dipropionate and organic carbon. The total volume to be injected is 3,200 pounds of product and approximately 2,000 gallons of water.

Determination on the NR 812 Injection Prohibitions:

The injection prohibition under s. NR 812.05, Wis. Adm. Code, is not applicable in this case because the proposed action is a WDNR-approved activity necessary for the remediation of groundwater. This letter serves as your approval from the WDNR to inject Provect-IR Antimethanogenic ISCR Reagent to treat CVOCs, including PCE, trichloroethylene (TCE), and breakdown products, cis-1, 2-dichloroethene (cis-1, 2-DCE) and vinyl chloride (VC) in groundwater, in accordance with this temporary exemption.

NR 140 Temporary Exemptions:

WDNR approval is hereby granted to the FEHR GRAHAM ENGINEERING & ENVIRONMENTAL. for the injection of Provect-IR Antimethanogenic ISCR Reagent at the Master Cleaners, 6326 Bluemound Road,

Wauwatosa, Wisconsin with certain terms and conditions. The expiration date of this temporary exemption must be less than 5 years, per NR 140.28(5) (e) 1. from the date of this letter.

The need to obtain a temporary exemption for the injection of a remedial material for which a groundwater quality standard has not been established is required under s. NR 140.28 (1) (d), Wis. Adm. Code. Based on the information provided by your consultant, it appears the requirements for a temporary exemption for the injection of a remedial material for which a groundwater quality has not been established under s. NR 140.28 (1) (d) have been or will be met in accordance with s. NR 140.28 (5) (c) and (d), Wis. Adm. Code.

Department approval is granted with the following terms and conditions:

A. General:

1. The remedial action for restoring contaminated groundwater or soil, and any infiltrated or injected contaminated water and remedial materials, shall achieve the applicable response objectives required by s. NR 140.24 (2) or s. NR 140.26 (2), Wis. Adm. Code, within a reasonable period of time.
2. The type, concentration and volume of substances or remedial material to be infiltrated or injected shall be minimized to the extent that is necessary for restoration of the contaminated groundwater.
3. Any infiltration or injection of contaminated water or remedial material into groundwater shall not significantly increase the threat to public health, or welfare, or to the environment.
4. No uncontaminated or contaminated groundwater, substance or remedial material shall be infiltrated or injected into an area where a floating non-aqueous liquid is present in the contaminated groundwater.
5. There shall be no expansion of soil or groundwater contamination, or migration of any infiltrated or injected contaminated water or remedial material, beyond the edge of previously contaminated areas, except that infiltration or injection into previously uncontaminated areas may be allowed if the Department determines that expansion into adjacent, previously uncontaminated areas is necessary for the restoration of the contaminated groundwater, and the requirements of s. NR 140.18 (1), Wis. Adm. Code will be met.
6. All necessary federal, state and local licenses, permits and other approvals are obtained and compliance with all applicable environmental protection requirements is required. A WPDES general permit for Discharge of Contaminated Groundwater from Remedial Action Operations is required for this action.

B. Specific:

7. The remedial materials to be injected to the groundwater shall be limited to Provect-IR Antimethanogenic ISCR Reagent solution.
8. The remedial material and injection project shall be as described in FEHR GRAHAM ENGINEERING & ENVIRONMENTAL.'s October 7, 2015 request.
9. FEHR GRAHAM ENGINEERING & ENVIRONMENTA shall notify the Southeast Region WDNR project manager of field activities no less than one (1) week before starting the injection.
10. Include soil vapor screening, using a PID, as a best management practice as part of the monitoring plan.
11. Remediation progress reports shall be submitted semi-annually, and shall include the groundwater Monitoring results. The first report should be submitted not more than three months after the first injection. Recommendations as to the next phase of sampling and/or the need for additional treatment shall be included in a future report. This report shall be submitted prior to the expiration date of this temporary approval.
12. Any significant changes to the injection process, based on information from the injection groundwater Monitoring reports or results shall be submitted to the WDNR for approval prior to the changes being Implemented at the Master Cleaners, 6326 Bluemound Road, Wauwatosa. This includes, but is not Limited to, adjustments to the volume/mass of the media injected, additional injection points, number of Injection/delivery events, and/or changes in the type of remediation media used in the injection points.

13. Modifications to the sampling schedule may be requested.
14. The responsible party may apply to the WDNR for an extension of this approval in the event that future injection/delivery activities are required, and the WDNR must receive any extension request before the expiration date of this approval.
15. The WDNR will review all permit extension requests, site-specific data and or any other necessary information.
16. Upon completion of the project, the placement monitoring wells must be abandoned in accordance with s. NR 141.25, Wis. Adm. Code, and later topped off with grout or native soils if settling occurs, unless converted to NR141 complying monitoring wells, or through an alternative approved by the WDNR Project Manager.

Monitoring Conditions: In addition to your plan, it is your responsibility to meet all of the following approval conditions during and related to your proposed infiltration/injection procedures at this site. The conditions are:

1. Maintain and follow the Site Specific Health and Safety Plan in accordance with the Occupation Safety and Health Administration (OSHA) and the United States Environmental Protection Agency (USEPA) health and safety standards for hazardous waste workers.
2. If a chlorinated water source (i.e. municipal water) is used as the make-up water, it shall be filtered through an activated carbon filter or method proposed in your report to remove chlorine.
3. Record the start and stop times and the actual volume of Provect-IR Antimethanogenic ISCR Reagent solution injected into each Injection or delivered to each placement monitoring well.
4. Monitor the ambient air in and around the work area during the Provect-IR Antimethanogenic ISCR Reagent solution injection.
5. Monitor the headspace of all injection points prior to each Provect-IR Antimethanogenic ISCR Reagent injection
6. Monitor the headspace of all groundwater monitoring wells prior to each groundwater monitoring event.
7. Conduct vapor monitoring at the closest proposed monitoring well locations, including a measurement of percent (%) LEL every 15 minutes during the first hour of each infiltration event.
8. Immediately notify the WDNR if any new groundwater quality enforcement standards are exceeded during monitoring.
9. Notify digger's hotline and all owners of utility-lines if your project requires this. Also notify the local fire department prior to injection activities, and ensure that any representatives of these entities be allowed to observe the injection activities, as needed after completing the injection, sample all monitoring wells for applicable parameters quarterly.
10. Ensure that the injection is performed at less than 100 psi at a rate which minimizes solution mounding in the aquifer, and plume disfigurement.
11. Maintain a log of all field monitoring results and injection/delivering activities.
12. Document and report all project activities and all test results to the WDNR within 60 days of completing the injection activities.

See Appendix 1 for additional conditions regarding the use of aggressive oxidants, if this is applicable to your site.

Failure to adhere to the provisions of this temporary exemption may result in WDNR requiring revisions to the remedial action design, operation or monitoring procedures, or the revocation of this exemption and the implementation of an alternative remedial action to restore soil or groundwater quality, or both.

WPDES Permit

Your proposed discharge is eligible for coverage under the general Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remedial Action Operations/Construction Site Storm Water Runoff Permit No. WI-S067831-04. You are responsible for compliance with the conditions contained in this permit. The permit and an accompanying facts sheet can be downloaded from the WDNR website at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>. The amended water will be injected into the groundwater. No pollutants shall be injected into the groundwater.

Discharges under this permit are required to be consistent with a discharge management plan that has been approved by the WDNR. Your plan, FEHR GRAHAM ENGINEERING & ENVIRONMENTAL's October 7, 2015 request will be considered as the required discharge management plan, which specifies analytical sampling of the discharge for VOC and RCRA Metals.

Treatment will be provided by injection/delivering of Provect-IR Antimethanogenic ISCR Reagent to groundwater. The facility must immediately notify the WDNR if any treated groundwater will be discharged to surface water. Any significant system changes will require WDNR approval.

The WDNR hereby authorizes your pollutant discharge under the general WPDES permit for Discharge of Contaminated Groundwater from Remedial Action Operations (WI-0046566-6). The following conditions are highlighted for your information:

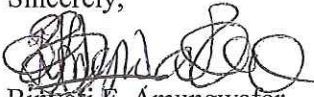
Section 283.35, Wisconsin Statutes, authorizes the WDNR to issue general permits for discharges from categories or classes of point sources. If a permittee believes coverage of a facility under a general WPDES permit is not appropriate, the permittee may apply for issuance of an individual WPDES permit pursuant to section 283.35 (2) and may petition the WDNR for withdrawal of coverage under the general permit. The individual permit application should indicate which site specific factors would justify alternate WPDES limits for the operation. Issuance of such a site specific WPDES permit will provide for a 30 day public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. The WDNR may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the WDNR may refer any violation of this permit to the Department of Justice for enforcement under s. 283.89, Stats. In order to avoid any enforcement action, please read the WPDES permit carefully and comply with the permit requirements.

If you believe you have a right to challenge the WDNR's decision to cover this facility with a WPDES general permit, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review WDNR decisions must be filed. To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the WDNR, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Such a petition should identify pollutant(s) that are believed to be not appropriately regulated by the general permit for the specific site. All requests for contested case hearings must be made in accordance with section NR 2.05 (5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the time period for filing a petition for judicial review.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the WDNR, to file your petition with the appropriate circuit court and serve the petition on the WDNR. A petition for judicial review must name the Department of Natural Resources as the respondent.

If you have any questions regarding this letter, please contact either me at 414-263-8607 or BinyotiAmungwafor@Wisconsin.gov

Sincerely,



Binyoti F. Amungwafor
Hydrogeologist
Remediation & Redevelopment Program

Cc: Mr. Kendrick A. Ebbott, FEHR GRAHAM ENGINEERING & ENVIRONMENTAL
Mr. Bryan Hartsook, -WDNR Water Resources Engineer
Mr. Brian Austin, WDNR DG/5
Mr. Bill Phelps, WDNR DG/5
Case File

Appendix 1

System and Well Construction, Installation and Abandonment:

1. That the direct injection holes and vapor monitoring points must be constructed as proposed in FEHR GRAHAM ENGINEERING & ENVIRONMENTAL's October 7, 2015 Report.
2. That the system configuration in the Work Plan must be installed and operated as proposed.

System Operation, Maintenance and Inspection:

1. That exclusion zones must be established for the facility during the entire injection process. This means that special safety measures should be taken within these areas.

Monitoring Schedules:

RR – Remedial Action Monitoring:

1. That the actual volume injected be recorded on an hourly basis for each day of the project.
2. That baseline monitoring be performed for the following groundwater parameters: VOCs, RCRA Metals, color, pH, conductivity, methane, ethane/ethene, total organic carbon (TOC), dissolved iron and manganese, sulfate, dissolved oxygen and oxygen reduction potential (ORP) in wells at your site
3. That during the injection, water table monitoring points of wells on your site shall be monitored hourly for the first hour after injection and every 2 hours thereafter during the injection, unless injection is occurring down that monitoring point.
4. That if any water table change of two (1) foot or greater increase occurs at any site monitoring points representing potential migration routes toward nearby building foundations and buried utility and sewer conduits (identified above) then:
 - Cease injection operations completely
 - Evaluate cause of water table change
 - Implement measures, to return the subsurface water table to acceptable levels.
 - Increase monitoring frequency. Rotate between monitoring points in the immediate vicinity of the monitoring point where the elevated water table was detected.
5. That baseline monitoring be performed for vapors, including VOCs using a PID and methane using a landfill gas meter of wells on your site
6. That during injection, vapor monitoring must be done every hour for the first 2 hours, then four times daily for the application duration if measurements remain near background at the locations listed in 6.

Wastewater WPDES monitoring:

7. That after completion of the injection phase of the remedial action, all existing monitoring wells and the chosen injection wells are sampled for the parameters listed in 2 above (baseline monitoring).
8. That after completion of the injection phase, quarterly monitoring shall continue for one year from injection completion, with sample collection and analysis completed according to items 2 and 6 above and the requirements of the accompanying WPDES discharge permit for this site.

Required Response Measures:

1. That if 10% of LEL is reached at any time and at any monitoring point:
 - a. cease injection operations immediately
 - b. evaluate cause of vapors
 - c. implement measures to reduce the vapor concentration to acceptable levels
 - d. increase monitoring frequency. Rotate between monitoring points in the immediate vicinity of the monitoring point where the elevated level was detected.
2. That if vapor levels are detected at or above 10% of the LEL within any building or within 20 feet of the building:

- a. evacuate persons from the building
- b. shut down all electrical power
- c. vent buildings by opening all doors and windows
- d. follow measures in #1.

Notification Requirements:

1. That in the event that sustained exceedances of the 10% of LEL is present for more than 30 minutes, or if 25% of LEL is reached at any time and at any monitoring point, then immediate notification of the local fire department is required.
2. That the Department be notified immediately of system breakdown or shutdown.
3. That the Department be notified immediately of any new or major increase (10-fold change) of groundwater quality enforcement standard exceedances in the water quality monitoring program.
4. That all owners of utilities and the local fire department and the WDNR Project Manager (John Hnat) be notified prior to injection activities and that representatives of each of these entities be allowed to observe the injection activities.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary
Mark Aquino, Regional Director

South Central Region Headquarters
3911 Fish Hatchery Road
Fitchburg, WI 53711-5397
Telephone (608) 275-3266
FAX (608) 275-3338
TTY Access via relay - 711

November 9, 2015

Mr. Tom Shipshock
Master Dry Cleaning, Inc.
W27 N7236 Glacier Pass
Hartland, WI 53029

SUBJECT: Coverage under General Permit WI-0046566-06, Discharge of Contaminated Groundwater from Remedial Action Operations

Handwritten notes: FID 241398630, BRRTS 02-41-545142

Dear Tom Shipshock:

The Department has reviewed your application for authorization to inject enhanced reductive dechlorination (ERD) for a remediation project at 6326 Blue Mound Road, Wauwatosa, WI (Master Dry Cleaning, Inc., FIN: 54742). The dissolved phase PCE contaminant plume is the result of historical use and storage at the Master Dry Cleaning Inc. (WDNR BRRTS #02-41-545142) remediation site.

Master Dry Cleaning Inc. is authorized by this letter for Provect-IR Antimethanogenic ISCR Reagent injections to remediate PCE contaminated groundwater. According to the management plan Fehr Graham Engineering & Environmental, Inc., has proposed a one-time injection over three days of approximately 3,200 pounds of ISCR Reagent mixed with approximately 2,000 gallons of water into subsurface using an array of 24 soil injection borings on site near existing monitoring wells SMW-9 and PZ-1. Each boring will receive approximately 100 to 150 gallons of solution. The design intention is to inject into the most impacted portion of the contaminant plume as indicated on the site layout map submitted. The anticipated water used for mixing with the ISCR Reagent and the additional straight water added as a flush to disburse the solution after injecting will be obtained from the City of Wauwatosa municipal water supply. Any significant injection changes will require Department approval.

Your proposed discharge is eligible for coverage under the general Wisconsin Pollutant Discharge Elimination System (WPDES) permit WI-0046566-06 for Discharge of Contaminated Groundwater from Remedial Action Operations. You are responsible for compliance with the conditions contained in this permit. The permit and fact sheet should be downloaded from the DNR website at http://dnr.wi.gov/topic/wastewater/generalpermits.html.

Discharges under this permit are required to be consistent with a discharge management plan that has been approved by the Department. Your application submitted will be considered as the required discharge management plan. All of your contaminated wastewater discharges must be done according to the terms and conditions of the permit, specifically sections 1, 2, 6 and 8.

General Requirements

- 1. Effective Term: Permit Coverage begins on November 9, 2015.



2. **Additives:** The discharge of other water treatment additives is prohibited unless their use is approved in writing by the DNR.
3. **Monitoring requirements:** Monitoring requirements for discharges designed to enhance the remediation of in-situ contaminants are found in Section 6 of the permit.
 - **Flow:** A record must be kept of the total daily volume of Provect-IR Antimethanogenic ISCR Reagent substrate injected.
 - **Parameters:** John Hnat, DNR Remediation & Redevelopment Project Manager will indicate in his response letter the contaminant monitoring requirements that must be reported to him.
4. **Reporting:**
 - Records of effluent volume and chemical monitoring data shall be submitted on discharge monitoring report (DMR) forms following each injection. All sample results must be reported on the DMR. Reports are due on the 15th day of the month following the completion of the injection. The owner must sign the DMRs. DMRs should be sent to the address indicated on the DMR. Please make copies of the enclosed DMR for your use.
 - Records required by this permit must be kept for the duration of the permit and made available for inspection by Department staff upon request.
 - **Any exceedances of the permit limits shall be reported to the Department within 24 hours of the permittee becoming aware of the exceedance.**

Limits based on groundwater quality protection are set at the preventive action limits in ch. NR 140, Wis. Adm. Code. These limits are based on substances reported to be in the discharge, but may not necessarily include all substances of public health or welfare concern, which are in the discharge. However, nothing in this permit allows the permittee to discharge any substance in a concentration that would cause groundwater standards in Ch. NR 140 to be exceeded.

If you have any questions about permit requirements or the contents of this letter, please feel free to contact me at (608)-275-3279.

Sincerely,



Alan Hopfensperger
Hydrogeologist

cc: Permit File – Region and Central Office
Ken A. Ebbott, Fehr Graham Engineering & Environmental, Inc.
Ms. Sherry, Master Dry Cleaning, Inc.
John Hnat, DNR R&R Project Manager (via email)
Binyoti Amungwafor, DNR R&R Southeast Region (via email)
Victoria Stovall, DNR R&R Southeast Region (via email)
Jeff Brauer, DNR Wastewater Engineer (via email)

LEGAL AUTHORITIES AND APPEAL RIGHTS

Section 283.35, Wisconsin Statutes, authorizes the Department to issue general permits for discharges from categories or classes of point sources. If a permittee believes coverage of a facility under a general WPDES permit is not appropriate, the permittee may apply for issuance of an individual WPDES permit pursuant to section 283.35(2) and may petition the Department for withdrawal of coverage under the general permit. The individual permit application should indicate which site specific factors would justify alternate WPDES limits for the operation. Issuance of such a site specific WPDES permit will provide for a 30 day public comment period, and potentially a public informational hearing and/or an adjudicatory hearing. The Department may withdraw a facility from coverage under a general permit if it is determined that a discharge is a significant contributor of pollutants to waters of Wisconsin, or in certain other cases set out in s. 283.35, Stats. In lieu of general permit withdrawal, the Department may refer any violation of this permit to the Department of Justice for enforcement under s. 283.89, Stats. In order to avoid any enforcement action, please read the WPDES permit carefully and comply with the permit requirements.

If you believe you have a right to challenge the Department decision to cover this facility with a WPDES general permit, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. Such a petition should identify pollutant(s) that are believed to be not appropriately regulated by the general permit for the specific site. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the time period for filing a petition for judicial review.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. A petition for judicial review must name the Department of Natural Resources as the respondent.

From: Dillon Plamann

Sent: Tuesday, July 07, 2020 2:59 PM

To: Hnat, John J - DNR <John.Hnat@wisconsin.gov>

Cc: Matt Dahlem <mdahlem@fehr-graham.com>; Donald P. DPG Gallo (dgallo@axley.com) <dgallo@axley.com>; Tom Shipshock (tshipshock@hydro-flo.com) <tshipshock@hydro-flo.com>

Subject: Master Drycleaners, BRRTS #02-41-545142, FID 241398630

Hi John,

We received access permission from the City of Wauwatosa to install the three new wells (MW-18 to MW-20) and one injection boring (IP8) in the city right of way. This was the last thing we were waiting on to move forward with the injection scope (Task 3/Task 103, CO #4 and CO #5) and drilling scope (Task 105, CO #5).

The driller and chemical contractor are available July 13-15 for the field work portion of these tasks, and will be onsite with Fehr Graham personnel to complete the injection and drilling. If there are any questions please give me a call.

Thank you for all of your assistance and quick responses with this case, it is appreciated. I will update you following the injection and drilling.

Thanks!

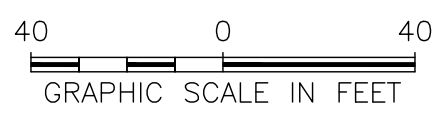
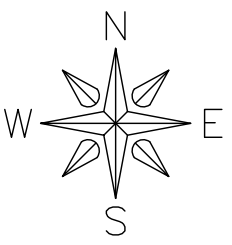
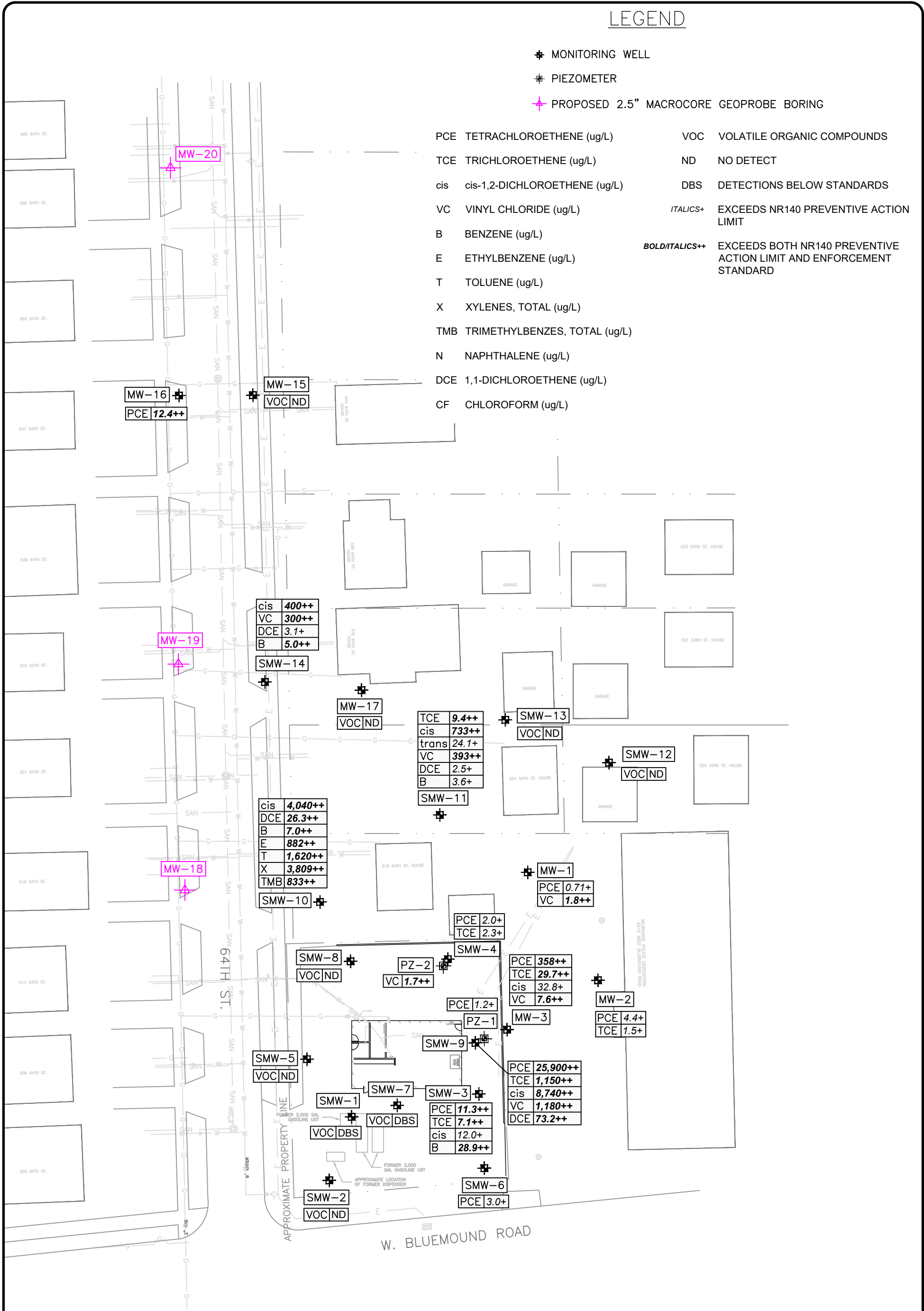
DILLON PLAMANN | Project Hydrogeologist
Fehr Graham | Engineering & Environmental

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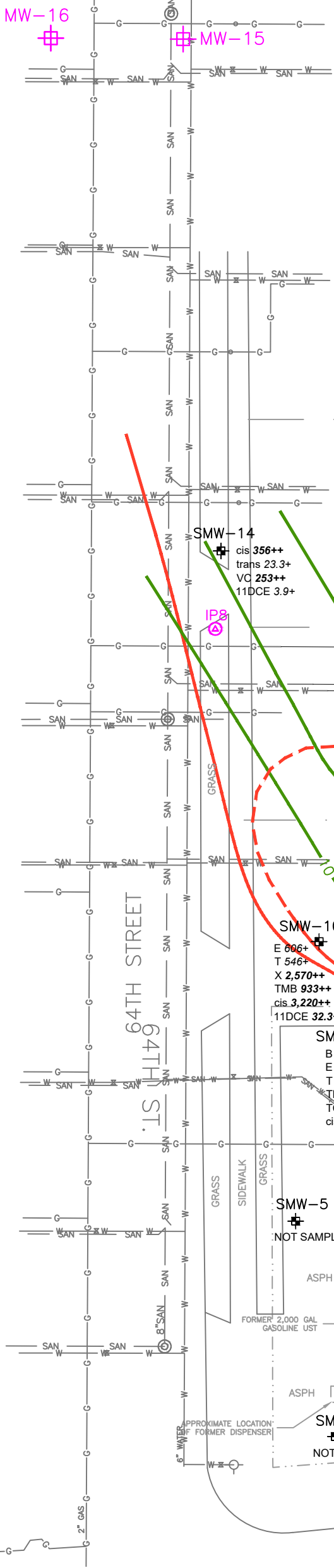
LEGEND

- ✦ MONITORING WELL
- ⊕ PIEZOMETER
- ✦ PROPOSED 2.5" MACROCORE GEOPROBE BORING

PCE	TETRACHLOROETHENE (ug/L)	VOC	VOLATILE ORGANIC COMPOUNDS
TCE	TRICHLOROETHENE (ug/L)	ND	NO DETECT
cis	cis-1,2-DICHLOROETHENE (ug/L)	DBS	DETECTIONS BELOW STANDARDS
VC	VINYL CHLORIDE (ug/L)	<i>ITALICS+</i>	EXCEEDS NR140 PREVENTIVE ACTION LIMIT
B	BENZENE (ug/L)	<i>BOLD/ITALICS++</i>	EXCEEDS BOTH NR140 PREVENTIVE ACTION LIMIT AND ENFORCEMENT STANDARD
E	ETHYLBENZENE (ug/L)		
T	TOLUENE (ug/L)		
X	XYLENES, TOTAL (ug/L)		
TMB	TRIMETHYLBENZES, TOTAL (ug/L)		
N	NAPHTHALENE (ug/L)		
DCE	1,1-DICHLOROETHENE (ug/L)		
CF	CHLOROFORM (ug/L)		



FEHR GRAHAM ENGINEERING & ENVIRONMENTAL ILLINOIS IOWA WISCONSIN	TITLE: PROPOSED BORINGS & 8/13/19 GROUNDWATER CHEMISTRY
	MASTER DRYCLEANING INC. 6326 W. BLUEMOUND RD. WAUWATOSA, WI 53213 BRRTS: 02-41-545142 JOB NO.: 15-1209 PLOT DATE: 5/13/20



LEGEND

- MW-14 MONITORING WELL / PIEZOMETER
- PROPOSED MONITORING WELL
- PROPOSED INJECTION BORING

NOTE: GROUNDWATER SAMPLES TAKEN 10/2/17

PCE	TETRACHLOROETHENE (ug/l)	<i>ITALICS+</i>	EXCEEDS NR140 PREVENTIVE ACTION LIMIT
TCE	TRICHLOROETHENE (ug/l)	BOLD++	EXCEEDS NR140 ENFORCEMENT STANDARD
cis	cis-1,2-DICHLOROETHENE (ug/l)	ND	NO DETECT
trans	trans-1,2-DICHLOROETHENE (ug/l)	DBS	DETECTIONS BELOW STANDARDS
VC	VINYL CHLORIDE (ug/l)		
11DCE	1,1-DICHLOROTHENE (ug/l)		
B	BENZENE (ug/l)		
E	ETHYLBENZENE (ug/l)		
T	TOLUENE (ug/l)		GROUNDWATER FLOW DIRECTION (10/2/17)
X	XYLENES, TOTAL (ug/l)		ESTIMATED TETRACHLOROETHENE PLUME
N	NAPHTHALENE (ug/l)		ESTIMATED TRICHLOROETHENE PLUME
TMB	TRIMETHYLBENZENES, TOTAL (ug/l)		ESTIMATED cis-1,2 DICHLOROETHENE PLUME
			ESTIMATED VINYL CHLORIDE PLUME

SMW-14
cis 356++
trans 23.3+
VC 253++
11DCE 3.9+

SMW-13
NOT SAMPLED

SMW-12
NOT SAMPLED

SMW-11
PCE 217++
TCE 81.7++
cis 117++
trans 2.5
VC 27.8++
11DCE 1.3+

MW-1
TCE 0.51+
cis 4.8
trans 0.49
VC 4.7++

SMW-10
E 606+
T 546+
X 2,570++
TMB 933++
cis 3,220++
11DCE 32.3++

SMW-8
B 2.2+
E 1.0
T 1.2
TMB 1.1
TCE 0.75+
cis 1.2

SMW-4
E 29.1
T 13.5
X 137.8
TMB 12.9
cis 930++
VC 52.9++

MW-2
B <0.50
PCE 2.3+
TCE 0.91+
cis <0.50
VC <0.18

SMW-5
NOT SAMPLED

SMW-9
PCE 621++
cis 59,700++
VC 14,200++
11DCE 600++

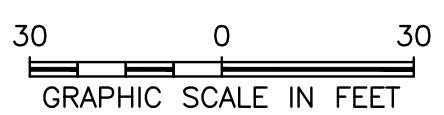
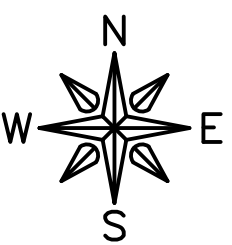
SMW-1
E 2,290++
T 122
X 12,750++
N 382++
TMB 1,902++

SMW-3
B 31.8++
E 40.8
T 11.9
TMB 1.7
TCE 1.2+
cis 6.0

SMW-2
NOT SAMPLED

SMW-6
PCE 2.4+
cis 0.31

W. BLUEMOUND ROAD



FEHR GRAHAM
ENGINEERING & ENVIRONMENTAL

ILLINOIS
IOWA
WISCONSIN

TITLE:
Proposed Injection and
Monitoring Well Locations

MASTER DRYCLEANING INC.
6326 W. BLUEMOUND RD.
WAUWATOSA, WI 53213

BRRTS: 02-41-545142
JOB NO.: 15-1209
PLOT DATE: 8/8/18

FIGURE:
101

DRWN: MKH DATE: 01/17/14 APPD: KE

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