



July 19, 2022

Jacob Lehmann
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Milwaukee, WI 53208
Via Electronic Mail Only to jacob@lehmannelectrical.com

Thomas Shipshock
c/o Harold Shipshock Estate
W275 N7236 Glacier Pass
Hartland, WI 53029
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Donald Gallo, Attorney
Axley Brynelson, LLP
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Waukesha, WI 53186
Via Electronic Mail Only to dgallo@axley.com

SUBJECT: Vapor Investigation Review
Master Drycleaning, Inc., 6326 West Bluemound Road, Wauwatosa, WI
BRRTS # 02-41-545142; FID # 241398630

Dear Mr. Lehmann, Mr. Shipshock and Mr. Gallo,

As you are aware, Fehr Graham on behalf of the Harold Shipshock Estate (formerly Master Drycleaning, Inc.) has been conducting a remedial action for the discharge of tetrachloroethene (PCE) at 6326 West Bluemound Road, Wauwatosa, WI (the site). Soil, groundwater and vapor sampling has been conducted on and off site to define the degree and extent of the PCE contamination per Wis. Admin. Code § NR 716.11(3)(a). The Department of Natural Resources (DNR) is requesting the installation of a vapor mitigation system (VMS) at the 518 North 64th Street residence (residence), the completion of the commissioning of the VMS at the onsite building and a vapor screening using the DNR guidance document RR-800.

Request for installation of VMS at 518 North 64th Street residence

The first round of sub-slab vapor sampling was conducted at the residence in 2009 and 2010. The results of the sampling identified trichloroethene (TCE), a breakdown product of PCE, above its residential vapor risk screening level (VRSL) in samples VP-3 and VP-3R. In Fehr Graham's *Additional Proposed Scope of Work* report dated December 20, 2016, they proposed the installation of a VMS at the residence and possibly the installation of a VMS at the 524 North 64th Street residence depending on results of sub-slab vapor sampling. The proposed installation of the VMSs and the costs were approved by the DNR in a letter dated December 22, 2016.

In Fehr Graham's *Status Report* dated February 22, 2017, results were provided of an additional round of sub-slab sampling at the residence which identified TCE below its detection limit in all samples. Based on these results, Fehr Graham did not recommend that a VMS be installed at the residence and sub-slab sampling was not recommended at the 518 North 64th Street residence.

Based on the exceedances of TCE in the vapors beneath the residence at levels above VRSLs in 2009 and 2010, the DNR is again requesting the installation of the VMS to prevent vapor inhalation by the homeowner. TCE has potential acute health risks at relatively low concentrations in indoor air. Attached is a fact sheet from the Department of Health Services for TCE. Commissioning and maintenance of the system is required; guidance regarding VMS commissioning can be found in RR-800. The DNR requests the submittal of a construction documentation report for the VMS within 60 days after the installation, per Wis. Admin. Code § NR 724.15.

Complete Commissioning of the Onsite VMS

In the *Vapor System Commission Report and Indoor Air Test Results* report dated May 25, 2017 by Fehr Graham, results were provided of one round of pressure field extension (PFE) readings and one round of indoor air sampling for commissioning of the VMS in the onsite building.

The DNR requested in a letter dated September 21, 2016 that to commission or verify the performance of the VMS in the onsite building, the following should be completed:

- A minimum of three PFE readings, with at least one in the summer and one in the winter to evaluate seasonal effects.
- Indoor air sampling after restoration of the building floor before occupancy and sample once within 6 months after occupancy.

No documentation has been provided to the DNR with the additional PFE readings and an indoor air sampling event within 6 months after occupancy. The DNR is requesting this additional work be conducted as soon as possible now that the building is occupied by the new owner Jacob Lehmann. Guidance regarding VMS commissioning can be found in RR-800.

Conduct Vapor Screening

Using the most recent soil and groundwater data, conduct a vapor screening using RR-800 to identify properties where vapor intrusion is possible. This process may be iterative as additional data becomes available.

Report Review

On June 9, 2022, the DNR received the *Remedial Action Documentation and Additional Site Investigation Report* by Fehr Graham. The DNR is in the process of conducting a review of the report and will provide a response.

Please feel free to contact me at 414-639-4007 or at alice.egan@wisconsin.gov if you have any further questions or concerns.

Sincerely,



Alice Egan
Hydrogeologist – Remediation and Redevelopment Program
Southeast Region

cc: Jeremiah Yee, Ph.D., Division of Public Health, Wisconsin Department of Health Services
Dillon Plamann, Fehr Graham

Enclosure:

P-02480, 10/2020: TCE in the Air, Wisconsin Department of Health Services, Division of Public Health

TCE in the Air

Trichloroethylene (TCE) health effects and actions you can take to protect your home's air

TCE is a man-made chemical used to clean metal in some factories and is found in some household items like paint, spot removers, and varnishes. If spilled, it can stay in the ground for a long time.

Why should I care?

- It can enter your home through cracks in the floor or walls of your basement, and other openings.
- It evaporates quickly and breathing the vapors is not healthy.
- It can cause cancer if you are breathe it over a long period of time.

Who has more risk?

Babies whose mother's breathe in TCE while pregnant can have:

- Lower birth weights
- Heart defects
- Nervous or immune system problems

What if TCE is in my community?

If there is a known concern, environmental health professionals will ask to check your home to make sure there is no TCE inside.

They need your permission to drill in your basement and test.

If they find high levels of TCE, they will suggest that you have a special system installed to fix the problem.

Do I have to pay?

The people responsible for the spill will probably have to pay for the testing and any repairs that have to be made.

A "sub-slab mitigation" system moves air from below to outside the house.



What else can I do?

- Wear protective gloves if you use products with TCE (like paint remover).
- Use only small amounts of products containing TCE.
- Use the chemical in well-ventilated areas.
- Do not stay in the room for long periods of time if you can smell the chemical while using it or after using it.

Where can I learn more?

- [Vapor Intrusion 101 \(video\)](https://www.youtube.com/watch?v=izo0QKqCToU):
www.youtube.com/watch?v=izo0QKqCToU
- [Vapor Intrusion Investigation — Information Sheet for Neighbors](https://dnr.wi.gov/files/PDF/pubs/rr/RR067.pdf):
<https://dnr.wi.gov/files/PDF/pubs/rr/RR067.pdf>
- [Why Test for Vapor Intrusion?](https://dnr.wi.gov/files/PDF/pubs/rr/RR953.pdf):
<https://dnr.wi.gov/files/PDF/pubs/rr/RR953.pdf>
- [Mitigation: Protection from Vapor Intrusion](https://dnr.wi.gov/files/PDF/pubs/rr/RR094.pdf):
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