

Mylotta, Pamela A - DNR

From: Arthur H. Glor [ahg@dewittross.net]
Sent: Wednesday, July 18, 2007 8:21 PM
To: Mylotta, Pamela A - DNR
Cc: Schmidt, James A - DNR; William P. Scott; Hatfield, Christopher C.
Subject: Express Cleaners - Racine, WI

Pam,

We completed our final workplan late this afternoon (7/18). Chris Hatfield of Northern Environmental will be completing the cost estimate for the final workplan and emailing it, together with the plan, to you tomorrow (7/19). He will copy Mark Drews on that email. I'm awaiting another call this evening from SCJ representatives to resolve any last minute conflicts which may come up. Barring unforeseen issues, we are planning to be on site at 1:00 PM tomorrow (7/19) to complete the work. SCJ representatives will be present to answer any questions from the media.

Thank you for your effort and assistance.

Sincerely,
Skip Glor
DeWitt Ross & Stevens S.C.
13935 Bishop's Drive, Suite 300
Brookfield, Wisconsin 53005
Tel: (262) 754-2871
Fax: (262) 754-2845

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Mylotta, Pamela A - DNR

From: Arthur H. Glor [ahg@dewittross.net]
Sent: Tuesday, July 17, 2007 2:08 PM
To: Mylotta, Pamela A - DNR
Cc: William P. Scott; William Scott; Chris Hatfield
Subject: RE: Express Cleaners - Racine
Attachments: Northern 6-26-07 Report (Text & Table 1).pdf; Northern 6-26-07 Report (Figure 1 & 2).pdf; Northern 6-26-07 Report (Table 2).pdf; Northern 6-26-07 Report (Table 3 & DERF Form).pdf

Pam;

Here are the report and workplan and figures covering the original investigation and proposal for additional extra work. I just sent you the "new additional garden work" planned to be done this week Thursday.

Give me a call with any questions.

Skip Glor
DeWitt Ross & Stevens S.C.
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Brookfield, Wisconsin 53005
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Fax: (262) 754-2845

From: Mylotta, Pamela A - DNR [mailto:Pamela.Mylotta@Wisconsin.gov]
Sent: Tuesday, July 17, 2007 1:50 PM
To: Arthur H. Glor
Subject: Express Cleaners - Racine

Hi Skip,
Jim asked me to work with you on this issue. Since the file is in Waukesha, it would help me if you could either e-mail or fax a copy of the last workplan that you sent to Mark Drews. I don't know if it even includes the sampling you plan to conduct off-site, but am hoping it does. Could you break out the costs for this work (highlight or otherwise mark them) and attach an e-mail or letter cover indicating what work you'll be doing and the total cost, referencing how it fits into the existing workplan? Thanks.

Pam

 Pamela A. Mylotta

Hydrogeologist, Remediation & Redevelopment Program
Southeast Region, Milwaukee Service Center
Wisconsin Department of Natural Resources

(☎) phone: (414) 263-8758
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07/19/2007

Mylotta, Pamela A - DNR

From: Arthur H. Glor [ahg@dewittross.net]
Sent: Tuesday, July 17, 2007 1:54 PM
To: Mylotta, Pamela A - DNR
Cc: William P. Scott; William Scott; Chris Hatfield
Subject: Express Cleaners - Racine, WI
Attachments: 7-16-07 Northern Draft Garden Sampling Plan.pdf; 7-16-07 Northern Garden Sampling Figure.pdf

Pam:

Sorry I missed your call. I tried returning your call but got a message the State voicemail system was temporarily "down". Consequently, I'm emailing to you.

Attached is our draft workplan JUST FOR THE SHALLOW SOIL AND VAPOR SAMPLING in the SC Johnson Community Gardens. This is the only item requiring some type of response from DNR at this time. Upon reading the workplan, you will see a paragraph on sampling actual plant tissue. While SCJ desires to have that work done too, we have not agreed to do that work as yet based on a lack of specified methodology and protocol for conducting both the sampling and applying the results of that analytical work.

Give me a call when you have read the plan. I have a 2:15 conference call with Linda Benfield and SC J to discuss the workplan and receive their comments.

Skip Glor
DeWitt Ross & Stevens S.C.
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Brookfield, Wisconsin 53005
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July 16, 2007
(ECI-01-2300-3057)

Ehrlich Family Limited Partnership
c/o Mr. Skip Glor
DeWitt, Ross, & Stevens, S.C.
13935 Bishop's Drive, Suite 300
Brookfield, Wisconsin 53005-6605

RE: **DRAFT** Additional Site Investigation Workplan, Express Cleaners, 3941 North Main Street, Racine, Wisconsin; WDNR BRRTS #02-52-547631

Dear Mr. Glor:

During March 2007, Northern Environmental Technologies, Incorporated (Northern Environmental) initiated the Wisconsin Department of Natural Resources (WDNR) approved site investigation workplan for Express Cleaners, 3941 North Main Street, Racine, Wisconsin (the Site). The workplan was to investigate a spill of chlorinated volatile organic compounds release (CVOCs) previously identified on the referenced property above. The discovery of CVOCs was the result of samples collected and analyzed as part of a real estate transaction. The initial site investigation results indicate additional investigation is warranted east of the Site on the adjacent property located at 3936 North Bay Drive, Racine, Wisconsin. This adjacent property is owned by S.C. Johnson & Sons, Incorporated (S.C. Johnson Property) and is currently used as a community garden. This letter provides the sampling plan for investigation on the S.C. Johnson Property to determine if released CVOCs are present. Background information for the site investigation is included in Attachment A.

WORKPLAN FOR INVESTIGATION ON S.C. JOHNSON PROPERTY

Near Surface Soil Sampling (root zone)

Northern Environmental will collect eight near-surface composite soil samples (6 to 8 inches below ground surface) in the locations shown on the attached Figure 1 with the objective to sample soil within the root zone. Soil collection and screening will begin at the surface of the soil in which the crop is planted, such as the top of the raised bed for any crop planted in a raised bed. In addition, prior to collecting the samples, the soil will be well loosened around one specimen of each crop species, the plant pulled out and the root length measured. Undoubtedly, some roots will be left in the soil, but the intent would be to verify that there is a significant mass of roots at the depth to be sampled. The sampling depth will be adjusted, if needed, to most represent soil within the root zone.

Six of the soil samples will be collected in the western most 15 feet of the S.C. Johnson Property. Two soil samples will be collected near the eastern edge of the S.C. Johnson property gardens. The soil samples will be collected using hand tools (i.e. garden trowel). All soil sampling equipment will be decontaminated after each use with distilled water and Alconox™ cleaning agent and double rinsed in distilled water. A portion of each composite sample will be fieldscreened using a PID. A second portion of the composite sample will immediately be placed in the appropriate laboratory containers, preserved with methanol, and placed on ice for shipment to a WDNR-certified laboratory. Soil samples will be laboratory analyzed for tetrachloroethene

(PCE), trichloroethene (TCE), cis 1,2-dichloroethene (cis 1,2-DCE), and vinyl chloride using EPA Method 8260B. A methanol blank will also be laboratory analyzed for PCE, TCE, cis 1,2-DCE and vinyl chloride.

Near surface Soil Vapor Sampling (root zone or tilled zone)

Northern Environmental will collect 2 soil vapor samples using a hand held sampling pump and Tedlar bag method at the locations shown in Figure 1. The vapor sample points will be constructed by boring an approximately 6- to 8-inch deep approximately 1-inch diameter borehole using hand tools. All equipment will be decontaminated before, during, and after use. A sample tube with a porous filter to prevent soil from entering the sample tubing will be placed within the borehole. The borehole will be backfilled with native topsoil prior to sampling. In addition, one air sample using laboratory provided "zero" will be collected to confirm that sampling equipment is not introducing contaminants to the air samples. Samples will be analyzed for PCE, TCE, cis 1,2-DCE, and vinyl chloride by a WDNR-certified laboratory.

Vegetable Matter Sampling

Prior to any crop tissue sampling, an action level for vegetable ingestion must be determined to evaluate the potential health risks to human consumption. Additionally, there is no known lab technique for preparing the crop tissue sample for CVOC analysis. Consequently, the soil and soil vapor samples will be analyzed while determining the need and/or methods to test the plant tissue samples. If an appropriate action level and lab methodology are found, a crop tissue sample from each identified plant specie will be collected and tested for PCE, TCE, cis 1,2-DCE, and vinyl chloride by a WDNR-certified laboratory.

Report Results

Sample results will be available approximately 1-week after collection. If requested, verbal laboratory analysis results will be provided to S.C. Johnson representatives when they are available. Northern Environmental will tabulate and summarize the results in a letter report. The results will be reported to S.C. Johnson representatives. The sample results will be compared to the soil screening levels used for the site investigation to determine if a health risk is present. The results of soil vapor sampling will be compared to OSHA Permissible Exposure Limits for each detected CVOC to determine if there is a potential health risk by inhalation during gardening activities.

We appreciate your cooperation in this matter. Please contact us if you have any questions or comments.

Sincerely,
**Northern Environmental
Technologies, Incorporated**

DRAFT

Christopher C. Hatfield, PG
Registered Geologist

DRAFT

Stuart J. Gross, PG
District Director

CCH/lmh
Enclosures

ATTACHMENT A
BACKGROUND INFORMATION

The Erlich Family Limited Partnership owns a small shopping center comprised of three building units located at 3921-3941 North Main Street. The northern-most building unit (3941 North Main Street) historically operated as a dry cleaning facility, and the current tenant is Express Dry Cleaners, Inc. (Express Cleaners). Phase I and II environmental site assessments (ESAs) were completed by Gabriel Environmental Services (Gabriel) during March and April 2006 as part of due diligence associated with the potential sale of the property (Gabriel, 2006a and 2006b). The Phase II ESA included the completion of three soil boreholes near the dry cleaning establishment. Two of the boreholes were completed east of the Site building in the area behind Express Cleaners. The remaining borehole was completed inside Express Cleaners. Concentrations of chlorinated volatile organic compounds (CVOCs), primarily tetrachloroethene (PCE) and its breakdown products trichloroethene (TCE) and cis 1,2-dichloroethene (cis 1,2-DCE), were detected in each of the boreholes. Gabriel concluded that used PCE and filters stored in 55-gallon drums and PCE stored within the building had been released to soil at the Site.

The results of the Phase II ESA were reported to the Wisconsin Department of Natural Resources (WDNR) who subsequently requested a site investigation and appropriate remedial action be performed. During March 2007, Northern Environmental Technologies, Incorporated (Northern Environmental) completed the WDNR approved site investigation workplan (Northern Environmental, 2007).

In accordance with the site investigation workplan, Northern Environmental documented the installation of nine boreholes four water table monitoring wells, one piezometer (PZI), and two temporary monitoring wells on March 27, 28, and 29, 2007. Soils encountered at the Site consisted of approximately 4 to 6 feet of silty sand fill and/or sand dune deposits underlain by silty clay till. Groundwater was encountered in the water table monitoring wells approximately 2 to 4 feet below grade (fbg). Groundwater was observed to generally flow north-northwest across the Site.

Based on field screening and laboratory results, released chlorinated volatile organic compounds (CVOCs) likely originated from multiple source areas. The primary source areas of tetrachloroethene (PCE) contamination appear to be a former solvent storage area as reported in the Gabriel ESAs located along the east side of the Express Cleaners unit and the area beneath the former dry cleaning machine. Spillage/leakage within the building likely migrated into soil through cracks or seams in the concrete floor. Spillage/leakage outside along the east side of the building likely originated from poor housekeeping practices. Dry cleaning solvents spilled outside may have drained east across the asphalt pavement and into surface soil along the eastern Site boundary. Breakdown products of PCE (trichloroethene, cis 1,2-dichloroethene, and trans 1,2-dichloroethene) were also detected in the soil samples. The greatest breakdown product concentrations were found along the eastern property boundary (B9). Breakdown products were also detected at elevated concentrations beneath the Site building. The presence of breakdown product concentrations suggests released PCE occurred throughout the history of dry cleaning activities at the Site.

Soil contamination extends up to 14 fbg (8 feet into silty clay till) in the source area, but does not appear to extend more than a few feet into silty clay till away from the source area. The vertical extent of released CVOCs in soil has been determined. However, the horizontal extent of CVOCs in soil has not been determined and likely extends off site to the north and east.

CVOCs in groundwater are present beneath Express Cleaners and north and east of the Site building. Breakdown products of PCE (trichloroethene and cis 1,2-dichloroethene) were also detected in groundwater. Elevated concentrations of breakdown products in groundwater suggest that PCE releases occurred throughout the history of dry cleaning activities at the Site.

The upgradient (southeastern) extent of contamination in groundwater (MW4) has been defined. However, CVOC-contaminated shallow groundwater likely extends off site to the north and east. CVOCs were not detected in groundwater from the deeper silty clay till aquifer (PZ1). The extremely low hydraulic conductivity of the silty clay till is limiting the downward migration of contaminants in groundwater. Therefore, the vertical extent of CVOCs in groundwater has been defined.

During June 2007, Northern Environmental submitted a workplan to the WDNR for additional investigation required to define the extent of released CVOCs. During July 2007, the adjacent property owner (S.C. Johnson & Son, Incorporated) east of the Site was informed of possible CVOC contamination extending into a vegetable garden on their property and to request property access to continue to determine the extent of CVOCs.



















