

Ms. Nancy Ryan
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Jr. Drive
Milwaukee, WI 53212

**REQUEST FOR NR 169 VARIANCE
FORMER EXPRESS CLEANERS SITE
3921-3941 N. MAIN STREET, RACINE, WISCONSIN
BRRTS #02-52-547631**

Dear Ms. Ryan:

On behalf of the Ehrlich Family Limited Partnership, Ramboll Environ US Corporation (Ramboll Environ) submits this request for variance for the Former Express Cleaners Site located at 3921-3941 N. Main Street in Racine, Wisconsin. This request for variance is submitted in accordance with the requirements of Wisconsin Administrative Code (WAC) Chapter NR 169.29 and covers costs associated with the performance of additional pre-remediation sampling and remedial action planning, along with costs incurred to stabilize the treated soils at the surface as part of the remedial action activities.

November 10, 2017

Ramboll Environ
175 North Corporate Drive
Suite 160
Brookfield, WI 53045
USA

T +1 262 901 0099
F +1 262 901 0079
www.ramboll-environ.com

Ref. 21-41301A

Additional Pre-Remediation Sampling (Task 2)

Based on the results of the pre-remedial soil sampling performed in September 2016, additional sampling was needed to further delineate the extent of the soil to be remediated. These borings were beyond what was initially included in the approved scope of work, but was deemed necessary to ensure that the treatment area was sized appropriately prior to implementation of the approved remedial action. The Wisconsin Department of Natural Resources (WDNR) was notified of the need for the sampling in the transmittal letter that accompanied the *Remedial Action Plan*. Due to the expedited timeframe for implementation, a formal change order was not able to be submitted prior to performance of the work.

In October 2016, six soil borings (B-51 to B-56) were completed to a depth of 12 feet below ground surface (bgs) to further refine the area identified for soil treatment. Two soil samples were collected from each soil boring location and were submitted to Pace Analytical, Inc. (Pace) for analysis of volatile organic compounds (VOCs). The VOC analytical results from these additional pre-remedial soil sampling was used to modify the eastern- and western-most extents of the soil treatment area. The completion of these six additional pre-remedial soil boring locations delineated the eastern and western extents of the soil treatment area and also delineated the soil treatment depth required in these areas, as well as in the suspected source area. As a result, the soil treatment area increased from approximately 5,628-square feet to 5,977-square feet. A detailed discussion of

these activities is included in the *Soil Remedial Action Completion Report* (Ramboll Environ, October 2017).

Costs associated with collection of the additional pre-remediation soil data along with corresponding changes to remediation subcontractor costs for the expanded treatment area were presented to the WDNR in email correspondence dated October 27, 2016. In a letter dated October 31, 2016, the WDNR approved the increased subcontractor costs and indicated that it may be appropriate to request a variance to allow for reimbursement of the additional soil sampling activities at the time of claim submittal. Because these soil borings were completed prior to the start of remedial action activities, the soil analytical results provided for a more complete delineation of the soil treatment area prior to the implementation of the remedial action. Furthermore, the extended soil treatment depth in the eastern portion of the soil treatment area was confirmed through the completion of these additional pre-remedial soil borings. Ramboll Environ therefore requests the WDNR's consideration of the additional pre-remedial soil sampling activities under the existing WDNR-approved Task 2 work scope as eligible costs in accordance with NR 169.13 (2)(a). The cost associated with the completion of these soil sampling activities was \$4,710. A cost breakdown sheet is attached.

Remedial Action Plans & Specification Updates (Task 3)

Additional costs were incurred during preparation of the Remedial Action Plan (RAP)/Plans & Specs based on the results of the additional assessment activities. These changes were necessary to refine the treatment area, coordinate the necessary design changes with the remediation subcontractor Redox Tech, and revise the remedial design plan. Therefore, Ramboll Environ, on behalf of Ehrlich Family Limited Partnership, requests the WDNR's consideration of the additional planning and design activities under existing Task 3 as eligible costs in accordance with NR 169.13 (2)(a). The cost associated with the completion of the RAP and Specification Updates was \$4,194. A cost breakdown sheet is attached. Please note that the actual permit fee cost is not included as it is an ineligible cost per NR 169.13(3)(a)18.

Surface Soil Stabilization (Task 5)

Following implementation of the *in situ* enhanced reductive dechlorination remedy, the surface of the treatment area required stabilization to allow for safe access to perform the post-treatment soil and groundwater monitoring activities, including the installation of replacement monitoring well MW-3R. The soil blending process inherently loosened the soils in the soil treatment area such that no equipment or personnel could safely access the location where soil blending occurred. The incorporation of the chemical amendments and water during the soil blending process resulted in soft soil conditions which had a consistency of wet slurry with no ability to support any weight. Without some form of surface soil stabilization, the treated soils could not adequately support equipment necessary to complete the approved post-treatment monitoring activities.

In November 2016, the treatment area was stabilized at the surface through the placement of a Geotextile Geonet Geocomposite. Eight inches of No. 2 stone (1½" to 2½") was placed on the geocomposite, followed by four inches of No. 56 stone (3/8" to 1"). The geocomposite was installed in sections in a north-south orientation and anchored at the boundary of the soil treatment area. The final surface of the soil treatment area was completed to be uniform with the surrounding property elevation and was graded to create positive drainage for surface water runoff and to prevent erosion of the final stone aggregate surface for the site.

A secondary benefit of the surface soil stabilization activities is that the resulting 12-inches of stone aggregate and the geocomposite serve as a protective barrier/cap to the underlying residual impacts. It is anticipated that this protective barrier/cap will remain in place until site redevelopment activities occur.

The subcontractor cost associated with implementation of the surface soil stabilization activities was \$17,000. A copy of the remedial subcontractors invoice is attached for your reference. The installation of the geocomposite and overlying stone aggregates is considered essential to providing a stable surface at the site to allow for performance of post-treatment monitoring. A variance of NR 169.13 (3)(a)(11) is therefore requested as the stabilization and surface restoration activities were performed to allow for completion of the response action and were not done for aesthetic or site improvement purposes.

Closing

On behalf of the Ehrlich Family Limited Partnership, Ramboll Environ appreciates the WDNR's consideration of this request for variance. Please contact us if you have any questions or comments.

Yours sincerely,

**Scott W. Tarmann, PE**

Senior Managing Consultant

D 262 901 0093

starmann@ramboll.com**Jeanne M. Tarvin, PG, CPG**

Managing Principal

D 262 901 0085

jtarvin@ramboll.com

cc: Mr. William Scott, Mallery & Zimmerman, S.C.

ATTACHMENT

Task 2 Variance Request for Additional Pre-Remediation Delineation

COST SUMMARY FOR: <i>Pre-Remediation Sampling & Abandonment</i>	
<i>Express Cleaners - Task 2 Variance Request</i>	
PROJECT NUMBER:	P21-41301A
PREPARED BY:	ST
DATE:	10/26/2016

COST SUMMARY	
Labor	\$1,505
Consultant Expenses	\$225
Subcontractors	\$3,080
Total	\$4,810

125
\$4,710

COST SUMMARY	
Task 1	\$4,810
Task 2	\$0
Task 3	\$0
Task 4	\$0
\$4,810	

TASK NO.	TASK DESCRIPTION	STAFF:	Principal	Manager 10	Manager 9	Manager 8	Sr. Assoc 6	Assoc 4	Drafting	Support	DOLLARS	HOURS	
		RATE:	\$185	\$155	\$155	\$134	\$118	\$88	\$77	\$65			
1	Additional Pre-Remedial Soil Sampling 6 SB's to 12 feet	HOURS	1	2					10	2		15	
		DOLLARS	\$185	\$310	\$0	\$0	\$0	\$0	\$0	\$880	\$130	\$1,505	
2		HOURS	0									0	
		DOLLARS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
3		HOURS										0	
		DOLLARS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
4		HOURS										0	
		DOLLARS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
TOTAL HOURS BY CATEGORY			1	2	0	0	0	10	0	2		15	
TOTAL DOLLARS BY CATEGORY			\$185	\$310	\$0	\$0	\$0	\$880	\$0	\$130	\$1,505		

	1.00
	1.00

CONSULTANT EXPENSES	COST FACTOR	PROJECT TASK NO.									DOLLARS		
		1	2	3	4	5	6	7	8	9			
Rental Car	1.00	\$100											\$100
Car Mileage (Enter number of miles)	0.565	\$100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Field Supplies ice, DI water, etc.	1.00	\$25											
Field Equipment	1.00	\$25	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$25
1-day rental of PID	1.00	\$100											\$100
CONSULTANT EXPENSE TOTALS		\$225	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$225
SUBCONTRACTOR COSTS													
Utility Clearance/Private Locator	1.00	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Surveyor	1.00	\$1,000											\$1,000
Drilling Subcontractor	1.00	\$1,300											\$1,300
Analytical Laboratory Subcontractor	1.00	\$780											\$780
SOIL: 12 samples (VOC)	1.00	\$780	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$780
SUBCONTRACTOR TOTALS		\$3,080	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,080

N/E

\$125

Task 3 Variance Request for RAP/
Plans & Specs Modification

COST SUMMARY FOR:		<i>RAP</i>
		<i>Express Cleaners - Task 3 Variance Request</i>
PROJECT NUMBER:	P21-41301A	
PREPARED BY:	ST	
DATE:	10/31/2017	

COST SUMMARY	
Labor	\$4,194
Consultant Expenses	\$0
Subcontractors	\$0
Total	\$4,194

COST SUMMARY	
Task 1	\$4,194
Task 2	\$0
Task 3	\$0
\$4,194	

TASK NO.	TASK DESCRIPTION	STAFF:	Principal	Manager 10	Manager 9	Manager 8	Sr. Assoc 6	Assoc 4	Drafting	Support	DOLLARS	HOURS	
1	RAP/Plans& Specification Updates and City of Racine Permit Acquisition	RATE:	\$185	\$155	\$155	\$134	\$118	\$88	\$77	\$65			
		HOURS		8			12	2	16	2		40	
		DOLLARS	\$0	\$1,240	\$0	\$0	\$1,416	\$176	\$1,232	\$130		\$4,194	
		HOURS											0
		DOLLARS	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0
TOTAL HOURS BY CATEGORY			0	8	0	0	12	2	16	2		40	
TOTAL DOLLARS BY CATEGORY			\$0	\$1,240	\$0	\$0	\$1,416	\$176	\$1,232	\$130	\$4,194		

	1.00
	1.00

CONSULTANT EXPENSE CATEGORY	COST FACTOR	PROJECT TASK NO.									DOLLARS	
		1	2	3	4	5	6	7	8	9		
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
EXPENSE TOTALS		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

RLP DIVERSIFIED, INC

207 Front Street
 Burlington, WI 53105
 PHONE:262-206-1297

Task 5 Variance Request
 for Line Item 13

Invoice

Date	Invoice #
12/5/2016	1858

Bill To
Ehrlich Family Limited Partnership PO Box 081007 Racine, WI 53408

Terms	Project
Due on receipt	FORMER EXPRESS CLEANERS SITE REMEDI...

Date	Quantity	Description	Rate	Amount
	1	Item 1 Health & Safety Plan, job prep and project management	5,600.00	5,600.00
	1	Item 2 Mobilize equipment and personnel to site	2,700.00	2,700.00
	1	Item 3 Install silt fence and erosion controls	1,200.00	1,200.00
	760	Item 4 Provide and set-up 760 L.F. of temporary construction fencing	4.85	3,686.00
	1	Item 5 Excavate and dispose existing abandoned utilities in soil blending area and remove Monitoring Wells MW-2 and MV-3	2,200.00	2,200.00
	1	Item 6a Soil blending contractor support during regular work week (five days total) N/A	0.00	0.00
	1	Item 6b Soil blending contractor support over weekend (two days total) N/A	0.00	0.00
	1	Item 7 Portable water (25,000 gallons) and secure/protect city metering equipment	900.00	900.00
	7	Item 8 Air monitoring technician and equipment	1,600.00	11,200.00
Total				

RLP DIVERSIFIED, INC

207 Front Street
 Burlington, WI 53105
 PHONE:262-206-1297

Invoice

Date	Invoice #
12/5/2016	1858

Bill To
Ehrlich Family Limited Partnership PO Box 081007 Racine, WI 53408

Terms	Project
Due on receipt	FORMER EXPRESS CLEANERS SITE REMEDI...

Date	Quantity	Description	Rate	Amount
	2	Item 9a Vapor suppression and control (2 drums Rusmar form)	650.00	1,300.00
	8	Item 9b Vapor suppression and control (equipment and operator)	950.00	7,600.00
	353.5	Item 10a Apply superadsorbent polymer, excavate and load excess treated soil into roll-offs for disposal (450 cubic yards)	7.75	2,739.63
	1	Item 10b Cetco QUICK-SOLID Superadsorbent media (2,330lbs) 2205lb super sac	7,200.00	7,200.00
	3	Item 10b Cetco QUICK-SOLID Superadsorbent media (2,330 lbs) 50lb sac	225.00	675.00
	3	Item 10c Lined roll-off containers for excess soil management	250.00	750.00
	58.08	Item 11 Transportation of excess soil in roll-offs to Waste Management Metro Landfill for disposal	19.00	1,103.52
	472.24	Item 11 Transportation of excess soil in Dump Trucks to Waste Management Metro Landfill for disposal	13.00	6,139.12
	530.32	Item 12 Disposal of Excess soil at Waste Management Metro Landfill	38.00	20,152.16
			Total	

RLP DIVERSIFIED, INC

207 Front Street
 Burlington, WI 53105
 PHONE:262-206-1297

Invoice

Date	Invoice #
12/5/2016	1858

Bill To
Ehrlich Family Limited Partnership PO Box 081007 Racine, WI 53408

Terms	Project
Due on receipt	FORMER EXPRESS CLEANERS SITE REMEDI...

Date	Quantity	Description	Rate	Amount
	6,800	Item 13 Site Grading, Placement of Geocomposite and stone aggregate over soil blending area	2.50	17,000.00
	1	Item 14 Demobilization Equipment, Remove Temporary Construction Fencing and Erosion Controls, clean-up, and Site closeout	2,000.00	2,000.00
			Total	\$94,145.43