



April 19, 2021

Gregg Margulis
3637 W Sherbrooke Drive
Mequon, WI 53092

Subject: NR 726 Case Closure Not Recommended – Site Investigation Incomplete
Milwaukee Fabricare, 4419 W Fond Du Lac Avenue, Milwaukee, WI
BRRTS #: 02-41-548258, FID #: 241303810

Dear Mr. Margulis:

On February 25, 2021, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. The DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. Ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed on March 23, 2021 with your environmental consultant, KPRG Associates Inc., case closure is not recommended because the site investigation was determined to be incomplete. The purpose of this letter is to inform you of the remaining requirements for obtaining closure.

Background

This site has been occupied by a dry-cleaning facility since the 1980s. On September 22, 2006, the DNR was notified that a discharge of a hazardous substance had occurred at the site. Site investigation activities conducted to date have identified chlorinated volatile organic compounds in soil, groundwater, and vapor at concentrations exceeding regulatory standards.

Site Investigation Incomplete Under Wis. Admin. Code Ch. NR 716

Additional work is needed to complete the site investigation as noted below.

a. Groundwater

Wis. Admin. Code § NR 716.11

Groundwater monitoring at the site defined the degree and extent of groundwater contaminants in the pre-remedial environment. Groundwater and soil remediation consisting of the injection of 3,020 gallons of ABC+ and zero valent iron solution occurred from June 19-21, 2017. After the completion of the groundwater remediation, one round of groundwater samples was collected from monitoring wells MW-1, MW-3, MW-4, MW-5, and MW-6 in March 2018. This sampling event demonstrated a decrease of concentrations in the source area but an increase in concentrations was observed at the off-site and downgradient well MW-4. Post-remedial monitoring is necessary to demonstrate the effectiveness of the injection and demonstrate that the groundwater plume is stable or receding in accordance with the case closure requirements of Wis. Admin code § NR726.05. Conduct a minimum of two quarterly rounds of groundwater monitoring of the well network to demonstrate the effectiveness of the remedial activities and document the current groundwater conditions at the site. The results of the groundwater sampling requested above should be evaluated to determine if additional groundwater monitoring is warranted.

b. Vapor

Wis. Admin. Code § NR 724.11(7) and NR 724.15

Sub-slab depressurization systems (SSDS) have been installed at the site and at the 4427 W. Fond Du Lac Ave. property. Additional actions are necessary to demonstrate the effectiveness of the SSDSs. Guidance regarding SSDS commissioning can be found in the DNR document “Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin” (RR-800). Conduct pressure field extension (PFE) testing to demonstrate that the SSDSs are adequately depressurizing the slab over the known area of vapor contamination. The PFE testing should be collected multiple times with at least one round during the heating season as outlined in RR-800. Additional indoor air sampling at the 4427 property is not necessary at this time and indoor air testing will not be required on the source property as the chemicals of concern are still in use in daily operations.

Sub-slab vapor samples collected at the 4441 W Fond Du Lac Avenue property in 2011 did not identify any vapor risk screening level (VRSL) exceedances. Since then, groundwater and soil remediation has occurred which may have mobilized contaminants, as demonstrated by the PCE increase in groundwater at MW-4. Additional sub-slab vapor samples are required from the 4441 W Fond Du Lac Avenue property to determine the risk of vapor intrusion. Two quarterly sampling events with one during the heating season and one during high water as outlined in RR-800 are required.

Conduct a vapor screening analysis of the 4443 W Fond Du Lac Avenue property in accordance with RR-800 to determine if vapor sampling is warranted at this property.

c. Receptors

Impacts to receptors Wis. Admin. Code § 716.07(7) and 716.11(5)

Site investigation activities must include an evaluation of the potential or known impacts to receptors, including onsite and offsite subsurface utilities. Provide a discussion of the locations, depths, and connections of subsurface utilities and present them on applicable figures. Discuss the potential for groundwater and vapor migration within or along the utilities.

d. Notifications

Notifications to off-site affected properties are required prior to case closure per Wis. Admin. Code § NR 725.05

Conclusion

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements. Workplan within 60 days (NR 716.09 (1)), beginning of additional work within 90 days of approval of workplan (NR 716.11 (2g)), supplemental SIR within 60 days of completion of work (NR 716.15 (1)).

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

For more information on the closure reconsideration process, please see DNR publication, RR-102, "Wis. Admin. Code Ch. NR 726 Case Closure Reconsideration Process" by visiting dnr.wi.gov, search: RR-102, for more information. If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager Tim Alessi at (414) 881-1015 or at timothy.alessi@wisconsin.gov.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



Timothy G. Alessi, P.G.
Southeast Region Team Supervisor
Remediation & Redevelopment Program

cc: Josh Davenport, KPRG Associates, Inc.