



April 18, 2011

Mr. Douglas Berry  
3319 Nobb Hill Drive  
Racine, WI 53406

Subject: Review of Site Investigation Report and Request for a "contained-out" determination for Imartinizing Dry Cleaners  
1730 State Street, Racine, WI  
WDNR BRRTS #02-52-549890 FID#252251010

Dear Mr. Berry:

On February 9, 2011 the Department received the Site Investigation Report prepared by Giles Engineering Associates, Inc., for the above noted property. After reviewing the site investigation report the Department has the following concerns that need to be addressed.

1. The vertical extent of soil contamination for PCE and TCE has not been defined near MW-1, MW-2, GP-1 and GP-2. The Department is concerned that it appears concentrations of these contaminants are increasing with depth.
2. Do you or your consultant have any suggestions for why the levels of contamination are higher outside the building than they are inside the building near the dry cleaning machine? Does this building have floor drains that are either not connected to the city sewer or may be damaged and leaking into the soils? An explanation is necessary please.
3. MW-1, MW-2, MW-3 and MW-4 appear to be acting as piezometers as the screens are beneath the water table. Do you and your consultant feel comfortable that these monitoring points are collecting the necessary information to eventually get this site to a point of closure?
4. Have you evaluated potential vapor intrusion into the building from the contaminated soils located beneath the building? If not that must be done.
5. If it is determined that there are floor drains with associated piping, please collected soil samples from the length of the piping run/s.
6. Have your consultant develop cross sections for this site. It appears that there are some anomalies with the geology that could impact the remedial action phase of this project.

After reviewing the Request for a "contained-out" determination:

1. Additional soil sampling would be beneficial in the areas of MW-2, MW-1, GP-1 and GP-2 to narrow down the amount of soil that will require disposal as hazardous waste.
2. Based upon the levels of PCE, TCE and VC in the soil samples collected outside of the points noted in #1 above, it appears that they fall below the levels that would require disposal as hazardous waste and can be treated as special waste.
3. Be sure that you meet all the necessary requirements for whichever disposal facility you work with. They may require additional sampling above and beyond what the Department needs.

Once the above concerns in relation to the Site Investigation Report are addressed, in writing not email or by phone, then the Site Investigation will be reviewed once again for completeness. If you have any questions feel free to call me at 262-884-2341.

Sincerely,

Shanna L. Laube-Anderson

Cc: Giles Engineering Associates, Inc., Kevin Bugel, N8 W22350 Johnson Dr., Suite A1, Waukesha, WI 53186