



July 26, 2022

Mr. Jason Berry  
BMP Realty, LLC  
3319 Nobb Hill Drive  
Mount Pleasant, WI 53406

Subject: Review of Change Order #3 – Proposed Additional Site Investigation and Cost Estimate  
Martinizing Drycleaning Site, 1730 State Street, Racine, WI  
BRRTS: 02-52-549890, FID: 252251010

Dear Mr. Berry:

The Department of Natural Resources (DNR) has reviewed the *Change Order No. 3 - Proposed Additional Site Investigation and Cost Estimate* provided as part of the DERF process and is requesting additional soil and groundwater samples be included in a revised scope of work. This will most likely increase the costs so your consultant should revise the scope of work and cost estimate and submit those to the DNR for review. The DNR provides the following comments as detailed guidance for your future work:

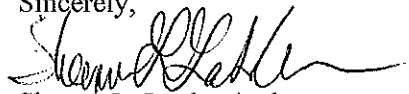
1. The DNR concurs with the proposal to collect one full round of groundwater samples from the current groundwater monitoring wells to be analyzed for VOC's prior to installing the proposed monitoring wells and piezometers, with the recommendation that the monitoring wells be redeveloped prior to sampling and that water level elevations be measured as part of the sampling effort to ensure proposed monitoring well placements are appropriate based upon the most current flow direction information.
2. Evaluate whether the proposed piezometer located near MW-5 would be better placed closer to the western side of the property near MW-3. The DNR concurs with locating a piezometer near MW-2. Provide the proposed depths for the piezometers compared to the depths of existing monitoring wells.
3. Provide the specific proposed monitoring well construction details and request a variance to Wis. Admin. Code ch. NR 141 requirements, if necessary. Describe the protective measures that will be taken when installing the piezometers to prevent them from becoming conduits for downward migration of shallow contamination, especially within the source area.
4. The DNR concurs with the proposal to conduct quarterly sampling of the existing and proposed monitoring wells.
5. The DNR concurs with the soil borings proposed within the building.
6. Shallow soil contamination near State Street would be better defined by adding soil borings in the area between MW-7 and MW-3, to collect samples from 0-4 feet below ground surface.
7. Potential migration of groundwater and/or vapor along the underground utilities should be evaluated, adding the location of all underground utilities that are adjacent to or on the property on the site maps.
8. The vapor mitigation system should be designed to protect the entire building. Additional sub-slab vapor samples beneath the building on the property are not recommended. The sub-slab vapor samples previously collected had PCE levels that warrant installation of a sub-slab vapor mitigation system. Given the expected temporal and spatial variability of vapor results, the proposed additional sub-slab vapor samples would not be adequate to either limit the areal coverage required for the mitigation system or to determine that a system is not needed. A commissioning plan should be proposed to demonstrate that the system is working as designed.

Review of Change Order #3  
Martinizing Drycleaning  
BRRTS: 02-52-549890

Page 2

Your consultant should address the DNR comments and recommendations in this letter in a revised scope of work and cost estimate for review. Include an updated cost tracking spreadsheet. If you have any questions or would like to meet to discuss this review, please contact me at [shanna.laubeanderson@wisconsin.gov](mailto:shanna.laubeanderson@wisconsin.gov).

Sincerely,



Shanna L. Laube-Anderson  
Remediation and Redevelopment Program  
Southeast Region

cc: Kelly Hayden, Giles Engineering Associates, Inc. – via email