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DEPARTMENT OF NATURAL RESOURCES
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May 11, 2021

Brian Cass
OHM Holdings, Inc.
W229 N2494 County Road F
Waukesha, WI 53186

Subject: Technical Assistance - Remedial Status Update Supplemental to the Semi-Annual Remediation Site Operation, Maintenance, Monitoring and Optimization Report
Former One Hour Martinizing, 13405 Watertown Plank Road, Elm Grove, WI 53122
BRRTS #: 02-68-552102

Dear Mr. Cass:

The purpose of this letter is to respond to your technical assistance request regarding the remedial status at the former One Hour Martinizing site located at 13405 Watertown Plank Road, Elm Grove, WI ("the Property"). The Department of Natural Resources ("DNR") received a technical assistance request on March 2, 2021, prepared on your behalf by your consultant Enviroforensics, LLC ("Enviroforensics"). The technical assistance request included a Remedial Status Update Supplemental to the Semi-Annual Remediation Site Operation, Maintenance, Monitoring and Optimization Report ("Report"). Enviroforensics requested DNR review of the data and recommendations presented in the Report. This letter summarizes the Report review, discussions with Enviroforensics and the Village of Elm Grove ("Village") regarding the status and future redevelopment of the Property, and discussions with Wisconsin Department of Health Services (DHS) regarding indoor air sampling. This letter also discusses the need for vapor pathway investigation and provides a reminder to submit an emerging contaminant scoping statement.

Report Recommendations

Four recommendations were presented in the Report based on the current status and future redevelopment of the Property by the Village. The DNR understands the redevelopment will involve Village acquisition of the Property, razing the former dry cleaner building, and daylighting Underwood Creek beginning in late 2022 to early 2023. Underwood Creek is currently contained in a concrete lined channel along the west side of the Property and the daylighted creek will be re-routed through the southwest portion of the Property. The four recommendations and DNR's responses are provided below.

1. *Sampling indoor air every six months, or until the former dry cleaner building is unoccupied or razed to ensure that the vapor intrusion pathway is incomplete*.

The DNR does not concur with the proposal to sample indoor air every six months, but does concur that indoor air should be monitored. Tetrachloroethylene ("PCE") was detected at sub-slab vapor point SS-3 on October 6, 2020 at a concentration greater than three times the Vapor Risk Screening Level (VRSL) for PCE.

The Village has indicated the Property was recently sold and the new owner has leased the building back to OHM Holdings until July 2021 for continued use as a drop-off and pick-up location for dry cleaned

clothes. Enviroforensics has indicated that PCE is not used in the building or the dry cleaner location it supports. The expected status of the building use and occupancy after July 2021 are not known. Installation of a vapor mitigation system (VMS) prior to redevelopment is not warranted based on the anticipated short-term occupancy of the building and the Village's plan to raze the building in late 2022 to early 2023.

Based on this information and DHS evaluation, DHS determined that DNR's vapor action limits (VALs) apply to the building occupants versus OSHA's permissible exposure limits. Based on the previous VRSL and VAL exceedances, the DNR requests continued indoor air monitoring and installation of a temporary engineering control (e.g. increase ventilation, seal cracks, and/or an indoor air carbon filtration unit) until the building is unoccupied. An 8-hour indoor air sample should be collected as soon as possible to evaluate current conditions. Monthly indoor air monitoring should be conducted while the building is occupied to evaluate the effectiveness of the DHS and DNR approved engineering control. Installation of a VMS may be warranted if the Village redevelopment plans are delayed and the building remains occupied.

2. *The soil vapor extraction (SVE) system should be decommissioned due to limited effect of remediating unsaturated soil along the railroad corridor and beneath the former dry cleaner building, and the high cost of maintenance and operation*.

The DNR concurs that the SVE system is not effective at remediating soil beneath the former dry cleaner building or along the railroad corridor and that cost associated with maintaining and operating the system prior to redevelopment is not warranted. The SVE system can be decommissioned with the understanding that additional soil remedial action will be required along the railroad corridor, beneath the former dry cleaner building, near the former storage shed, and the new creek channel with redevelopment of the Property, as further discussed in response No. 4 below.

3. *No further active groundwater remedial efforts or groundwater monitoring until redevelopment plans have been reviewed and approved by the DNR*.

The Village initially indicated that redevelopment of the Property would begin during the summer of 2021. With this plan, the DNR would concur that no further active groundwater remediation or monitoring would be required prior to redevelopment. The Village has now indicated redevelopment has been pushed back to late 2022 to early 2023. The DNR concurs that no active groundwater remedial action is needed prior to redevelopment based on source area reduction, plume stability and ongoing contaminant degradation. Additional active groundwater remediation may be required if post-redevelopment monitoring indicates a change in source area size and/or location, plume stability, or reduced contaminant degradation. The DNR requests continued groundwater monitoring until redevelopment begins and approves reducing the groundwater monitoring frequency from quarterly to semi-annually with the redevelopment delay.

If redevelopment is delayed beyond early 2023, the groundwater monitoring results will have to be evaluated and an appropriate monitoring frequency should be proposed. The groundwater remedial action effectiveness will have to be re-evaluated after redevelopment of the Property and a groundwater monitoring schedule should be provided to the DNR for approval as part of the final groundwater remedial plans.

4. *The redevelopment plan should include appropriate management of contaminated soil around borings B-15/B15R to ensure the direct-contact risk is minimized*.

The DNR concurs that the redevelopment plan should include appropriate management of contaminated soil around borings B-15/B15R. Additional areas of contaminated soil requiring appropriate management will likely be encountered during redevelopment. These areas include soil beneath the former dry cleaner building, soil near the former storage shed, soil excavated for the new creek channel, and soil excavated for new utilities. A Remedial Action Plan, a Materials Management Plan, and/or a Cap Maintenance Plan should be provided to the DNR for approval prior to redevelopment and managing soil at the Property. It also should be determined if soil exposed for creek channel relocation will cause contaminants to be released to groundwater and surface water prior to redevelopment.

Vapor Pathway Investigation

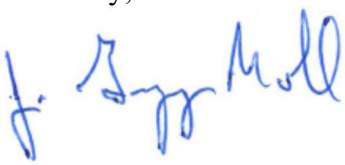
The soil gas investigation conducted from 2012-2015 indicated vapor migration in the sanitary sewer lines and/or the sewer line utility corridors beneath the Property. A subsequent soil gas investigation conducted in October 2020 indicated reduced soil gas concentrations, but continued vapor migration along and/or within the sewer lines. Additional vapor pathway investigation is needed to define the degree and extent of the vapor contamination (Wis. Admin. Code §§ NR 716.11(3)(a), (4) and (5)(a)) and to determine if the sanitary sewers or other utility corridors are acting as preferential pathways for vapor migration to off-site properties and right-of ways near the Property.

Emerging Contaminant Scoping Statement

An emerging contaminant scoping statement, including perfluoroalkyl and polyfluoroalkyl substances (PFAS) compounds, is required for all sites that have not received final case closure, regardless of the review stage. The DNR recommends providing the scoping statement as early as possible to allow time for sampling, if required. Per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code NR § 716.09, site investigation scoping will include an evaluation of potential PFAS compounds that may have been historically produced, used, handled or stored at the site. The evaluation should include any available information on whether products containing PFAS were used in process services, the duration of PFAS use, the types of PFAS used, and areas where PFAS may have been used, stored, or discarded.

The DNR appreciates the efforts you are taking to address the contamination at the Property. If you have questions regarding this letter, please contact me at (262) 202-3921, or gregory.moll@wisconsin.gov.

Sincerely,



J. Gregory Moll, P.G.
Hydrogeologist
Remediation & Redevelopment Program

cc: Wayne Fassbender, Enviroforensics, LLC