



August 8, 2016

Tom Romano
Sauk Creek LLC
7941 Tree Lane
Madison WI 53717

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Former TLC Dry Cleaning, 668 North High Point Road, Madison, Wisconsin
DNR BRRTS Activity Number: 02-13-552185

Dear Mr. Romano:

The Department of Natural Resources (DNR) considers the former TLC Dry Cleaners site closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The South Central Region Closure Committee reviewed the request for closure on April 7, 2016. The DNR Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases. A request for remaining actions needed was made by the DNR and documentation that the conditions in that letter were met was received on July 25, 2016.

This property is a former dry cleaning facility that ceased operation in 2014. Tetrachloroethylene, a common dry cleaning fluid, was found in soil, groundwater and indoor air. Remedial actions were limited due to the presence of the building on-site. A vapor mitigation system must be operated in a portion of the building to ensure indoor air quality. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code, enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.
- A vapor mitigation system must be operated and maintained, and inspections must be documented.

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

Geographic Information System (GIS) Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at <http://dnr.wi.gov/topic/Brownfields/clean.html>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the GIS Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

All site information is also on file at the South Central Regional DNR office, at 3911 Fish Hatchery Road, Fitchburg, Wisconsin. This letter and information that was submitted with your closure request application, including any maintenance plans and maps, can be found as a Portable Document Format (PDF) file in BRRTS on the Web.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination and/or to maintain the functioning of a vapor mitigation system. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where a building foundation (acting as) a vapor mitigation system or barrier is required, as shown and described in the attached vapor mitigation system maintenance plan unless written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;
- changing the use or occupancy of the property to a residential setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, etc., or
- changing the construction of a building that has a vapor mitigation system in place.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plan are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats., to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
3911 Fish Hatchery Road, Fitchburg, WI 53711

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached March 2, 2016 Figure B.3.b. Groundwater Isoconcentration. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains as indicated on the attached March 2, 2016 Figure B.2.a. Soil Contamination. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats., s. NR 726.15, s. NR 727.07 Wis. Adm. Code)

The building that exists in the location shown on the attached maintenance plan shall be maintained in compliance with the **attached maintenance plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code.

The vapor barrier and sub slab mitigation sump that exists in the location shown on the **attached maintenance plan**, shall be maintained in compliance with the **attached maintenance plan** in order to prevent or limit vapor intrusion into the building.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Vapor Mitigation System: Soil vapor beneath the building contains chlorinated organic chemicals at levels that would pose a long-term risk to human health, if allowed to migrate into an occupied building on the property. The vapor mitigation system, installed on site, must be operated, maintained and inspected in accordance with the **attached** maintenance plan. System components must be repaired or replaced immediately upon discovery of a malfunction. Annual inspections and any system repairs must be documented in the inspection log (DNR form 4400-305). The inspection log shall be kept up-to-date and on-site. Inspections shall be conducted in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

If a decision is made to no longer use the vapor mitigation system, or to make a change to the vapor mitigation system, the property owner must notify the DNR at least 45 days before shutting the vapor mitigation system off, or before making any other change to the system, and evaluate whether conditions are protective of public health and safety. Additional response actions may be necessary.

The integrity of the floor that exists on the property must be maintained in compliance with the **attached maintenance plan**. This will help ensure proper functioning of the vapor mitigation system, limiting vapor intrusion to indoor air spaces.

Please be sure to file a final reimbursement claim for the Dry Cleaner Environmental Response Fund (DERF) program. Claim forms can be found at: <http://dnr.wi.gov/Aid/DERF.html>

In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats., or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Michael Schmoller at 608-275-3303.

Sincerely,



Linda Hanefeld
South Central Region Team Supervisor
Remediation & Redevelopment Program

Attachments:

- remaining groundwater contamination March 2, 2016 Figure B.3.b Groundwater Isoconcentration
- remaining soil contamination, March 2, 2016, Figure B.2.a Soil Contamination
- vapor mitigation system operation and maintenance plan, Appendix D, March 2, 2106

cc: Jason Bartley, ReadyEarth Consulting, Inc., PO Box 365, Pewaukee, WI 53097

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

asphalt parking

B-1/MW-1

asphalt parking

High Point Road

concrete sidewalk

B-2	3-26-14	6-8
PCE	<i>52.0 J</i>	

fmr. dry cleaning machine (removed)

B-2	4-21-12	3
PCE	<i>69</i>	

mechanical room

B-2/MW-2

HB-1

B-3/MW-3

trash enclosure

GB-2	10-25-11	2.5-5
PCE	<i>40 J</i>	

approximate extent of soil impacts above RCLs

asphalt parking

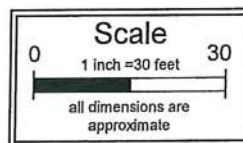
GB-1	10-25-11	6-10	27-30
PCE	<i>34 J</i>	<i>45 J</i>	

approximate property boundary

light pole (typ)

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- PCE = tetrachloroethene
- - - = approximate extent of soil impacts above RCLs

Notes:
 1.) concentrations in *blue italics* attain or exceed the RCL for the groundwater pathway.
 2.) "J" denotes an estimated concentration between the method detection limit and the reporting limit.



Drawing No.: 13-0702f

DWG Date: 2-3-15

Rev Date: 3-2-16

Drafted by: JEB

B.2.a Soil Contamination
 Former TLC Cleaning Facility
 668 High Point Road
 Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

High Point Road

asphalt parking

MW-1	PCE
5-28-14	11.1
8-12-14	9.5

B-1/MW-1

asphalt parking

GW flow
5-28-14

GW flow
8-12-14

MW-2	PCE
5-28-14	4.2
8-12-14	3.7

fmr. dry cleaning
machine
(removed)

mechanical room

asphalt parking

B-2/MW-2

HVAC fenced
enclosure
HB-1

MW-3	PCE
5-28-14	<i>0.97 J</i>
8-12-14	1.1

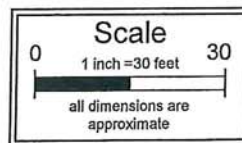
approximate extent of
GW impacts above PAL
(GW-59 feet bgs)

concrete sidewalk

trash enclosure

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- ⊙ = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- PCE = tetrachloroethene
- = approximate extent of groundwater impacts above PAL

- Notes:
- 1.) concentrations in *blue italics* attain or exceed the PAL.
 - 2.) concentrations in **red bold** attain or exceed the ES.
 - 3.) "J" denotes an estimated concentration between the method detection limit and the reporting limit.



Drawing No.: 13-0702g

DWG Date: 2-3-15

Rev Date: 3-2-16

Drafted by: JEB

B.3.b Groundwater Isoconcentration

Former TLC Cleaning Facility

668 High Point Road

Madison, Wisconsin

**VAPOR MITIGATION SYSTEM (VMS) MAINTENANCE PLAN
DNR BRRTS No. 02-13-552185**

March 2, 2016

System Description, Purpose, and Location:

668 N. High Point Road
Madison, WI 53717

Parcel Identification No.: 60-0708-232-1228-1

LOT 1, CERTIFIED SURVEY MAP 5514, RECORDED IN VOL. 25 OF CERTIFIED SURVEY MAPS, PAGE 126 #2074308, IN THE CITY OF MADISON, DANE COUNTY, WISCONSIN.

This document is a maintenance plan for a vapor mitigation system (VMS) at the above-referenced property (the "Property"). This maintenance plan is prepared in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code.

Select volatile organic compounds (VOCs) have been detected in vapors beneath the floor slab of the existing building at the Property. The source of the VOCs is a former dry cleaning business that operated at the Property. The dry cleaning operations at the Property ceased as of June 2014. The VOCs have been investigated and a closure request has been submitted to the Wisconsin Department of Natural Resources (DNR). As a component of closure, the DNR requires that a VMS be maintained at the Property. The locations of the VMS components are illustrated on the attached D.1.a and D.1.b as well as the attached photographs.

More site-specific information about the Property may be found in:

- The case file in the Wisconsin Department of Natural Resources (DNR) Fitchburg Service Center located at 3911 Fish Hatchery Road, Madison, WI 53711
- BRRTS on the Web (DNR's internet database of contaminated sites): <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>
- GIS Registry PDF file for further information on the nature and extent of contamination: <http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>

The VMS at the Property is designed to vent air from beneath the floor slab to the exterior of the building. The VMS consists of one drop point through the floor slab along the west wall in the southern portion of the 668 N. High Point Road space. The interior components of the VMS consist of one 4-inch PVC pipe that extends vertically from just below the floor slab up to approximately 10 feet that then runs horizontally (with appropriate pitch) through the south wall of the building. The vertical section of the interior pipe includes a "U" tube manometer to indicate system operation. The exterior components of the VMS include a vertical section of the pipe that runs through an in-line fan that exhausts above the roof line. The fan is hard wired through exterior and interior junction boxes to an internal power source.

System Design:

The piping throughout the VMS is 4-inch, schedule 40 PVC. The piping is sealed through the approximate 5- to 6-inch concrete flooring with a rubber gasket and caulking. The vertical section of the pipe from the floor slab includes a simple "U" tube manometer. One end of the manometer tube is open to the ambient air, the other end of the tube is sealed within the pipe, and the tube is filled with liquid (dyed red for easy visual evaluation). The differential in the liquid levels from one side of the tube to the other indicates the relative pressure differential within the pipe compared to the ambient atmosphere.

The in-line fan is an HP-220 Fantech fan. The fan was wired by a licensed electrician and is equipped with a weatherproof disconnect. The fan exhausts approximately 10 inches above the roof line.

System Maintenance:

The system must run continuously at the Property in order to be in compliance with this Maintenance Plan. There is no required maintenance per the manufacturer's specification sheet. In the event that the fan requires maintenance or becomes inoperational (either audibly or by visual inspection of the manometer), the fan should be inspected, repaired, or replaced by competent personnel and any replacements shall be at least equivalent to the equipment originally installed. Any repair or replacement activities shall be documented in the attached Inspection Log.

The VMS riser floor penetration and the flooring in the immediate vicinity of the riser penetration shall be maintained as to continue to provide as impermeable a flooring

surface as practical. Any repairs or other penetrations through the existing flooring must be conducted to provide as impermeable a flooring surface as practical. Any repair or replacement activities shall be documented in the attached Inspection Log.

If removal or other material changes to the VMS are considered, the Property owner shall contact DNR at least 45 days before taking such an action to determine whether further action may be necessary to protect human health, safety, or welfare, or the environment, in accordance with s. NR 727.07, Wis. Adm. Code. The system may only be removed upon written approval from the DNR. Additional sampling may be required to demonstrate that the VMS is no longer warranted for the Property.

Inspections:

The VMS is designed to easily verify system operation through visual inspection of the manometer. The level of red liquid in the side of the manometer tube that extends into the piping should be higher than the level of liquid in the end of the tube that is open to the air (see Photo 4). The operation of the fan can be checked by simply listening for the sound of the fan running.

All inspections shall be documented on the attached inspection log, and the inspection log shall be maintained at the Property along with this Maintenance Plan. The DNR closure letter will specify the frequency of the VMS inspections and whether the inspection log needs to be submitted to the DNR.

Notifications:

The Property use shall not be changed to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings, without written approval from the DNR. Further, changes to the construction of the building that would affect the operation of the current VMS shall not be made without written approval from the DNR.

If removal or other material changes to the VMS are considered, the Property owner shall contact DNR at least 45 days before taking such an action to determine whether further action may be necessary to protect human health, safety, or welfare, or the environment, in accordance with s. NR 727.07, Wis. Adm. Code. The system may only be removed upon written approval from the DNR.

Contacts Information (as of April 2015):

Site Owner Contact:

Flad Development & Investment Corp.
Attn: Mr. Tom Romano
Oakbridge Commons
7941 Tree Lane, Suite 105
Madison, WI 53717-2029
(608) 833-8100
tromano@flad-development.com

Signature: _____

Consultant:

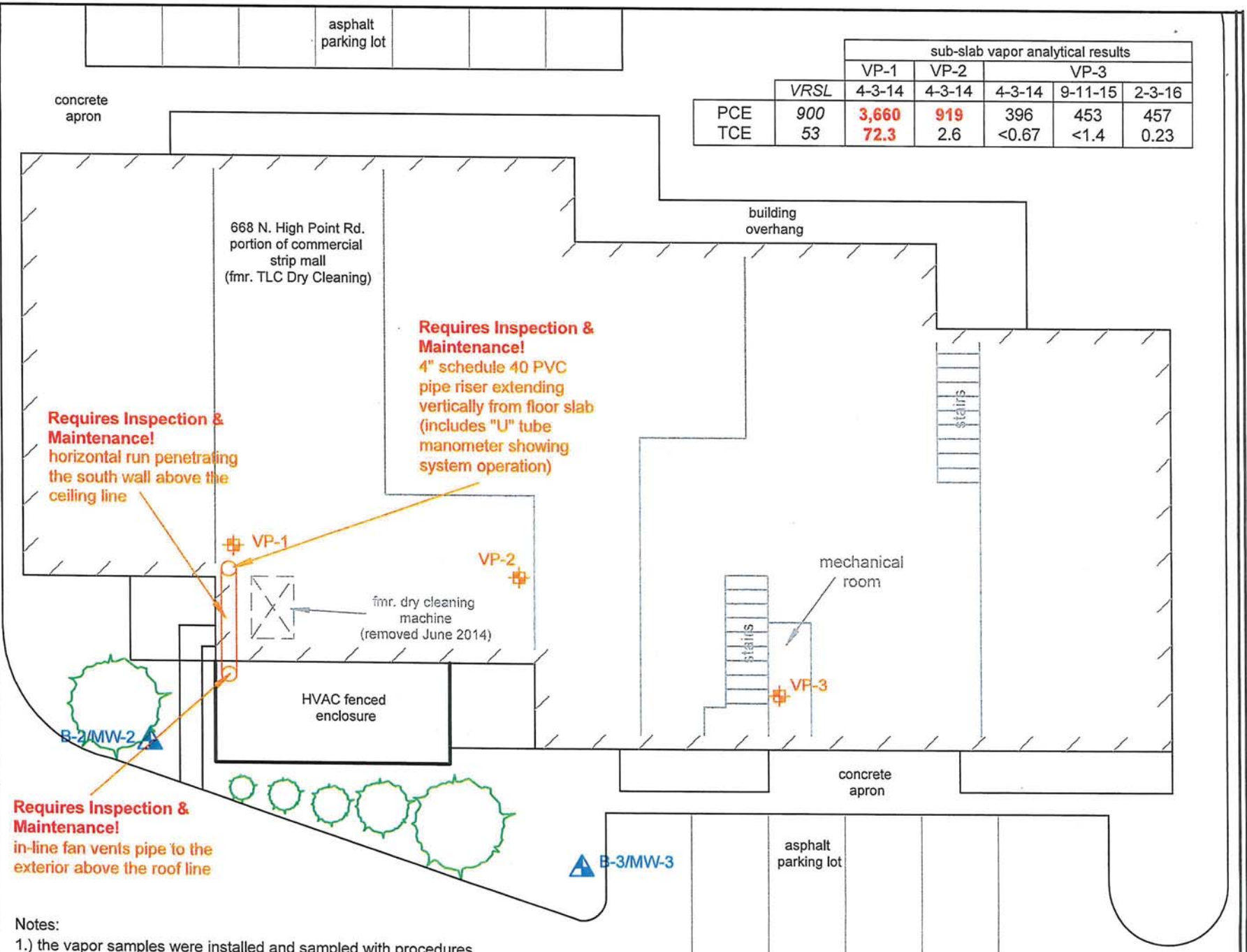
ReadyEarth Consulting, Inc.
Attn: Jason Bartley
P.O. Box 365
Pewaukee, WI 53072
(262) 522-3520
jbartley@readyearth.net

VMS Installation Contractor

Zander Solutions
Attn: Corey Benson
3316 Meadow Road
Verona, WI 53593
(608) 821-4378
cbenson@zandersolutions.com

DNR Project Manager:

Mr. Michael Schmoller
3911 Fish Hatchery Road
Madison, WI 53711
(608) 275-3303
michael.schmoller@wisconsin.gov

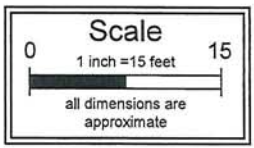


	VRSL	sub-slab vapor analytical results				
		VP-1	VP-2	VP-3		
		4-3-14	4-3-14	4-3-14	9-11-15	2-3-16
PCE	900	3,660	919	396	453	457
TCE	53	72.3	2.6	<0.67	<1.4	0.23

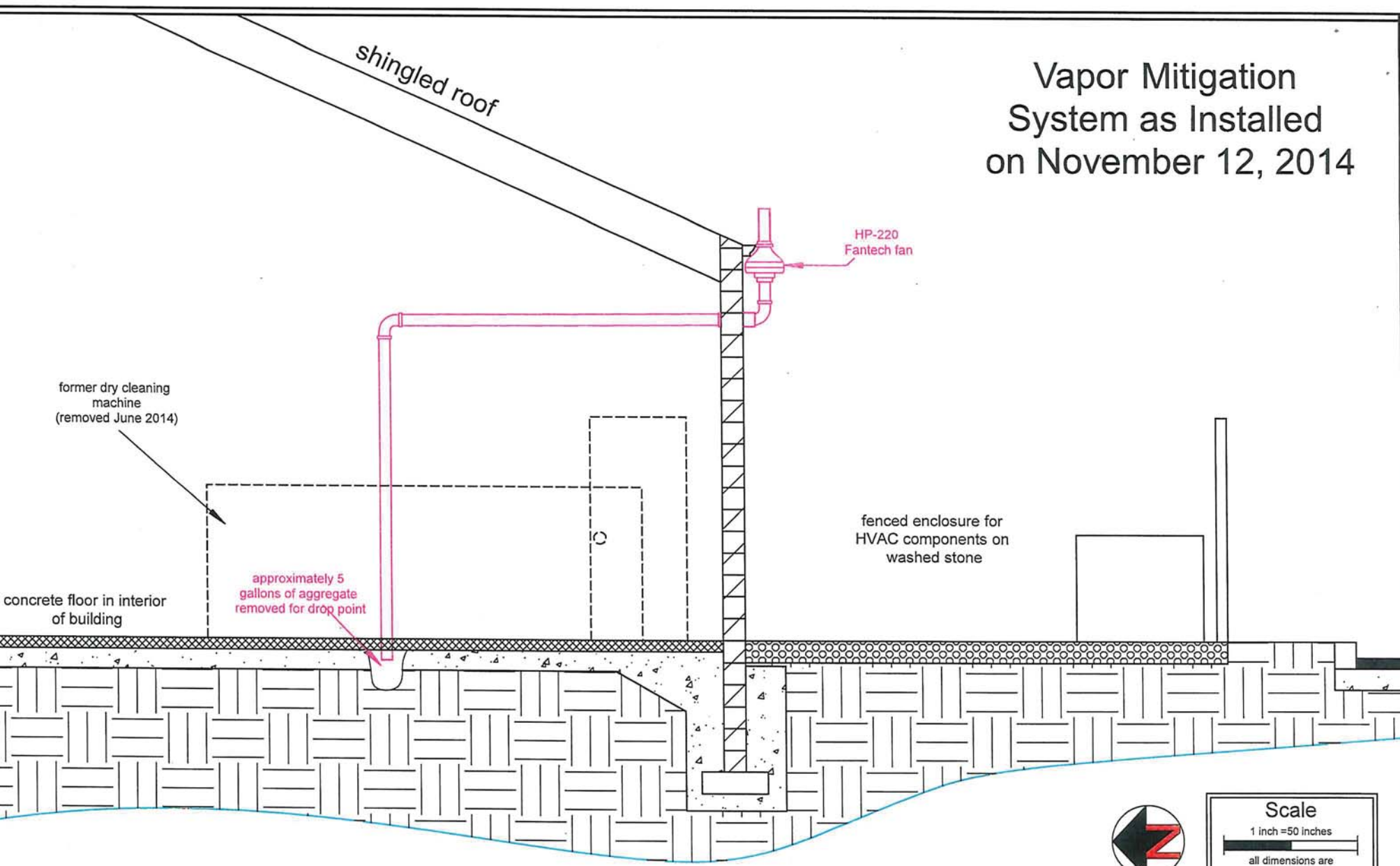
Notes:

- 1.) the vapor samples were installed and sampled with procedures in accordance with DNR Guidance Documents RR-800 and RR-986.
- 2.) concentrations in **red bold** exceed their VRSLs
- 3.) the VRSLs are for small commercial properties and were obtained from the DNR Quick Lookup Table. The VRSLs were determined from the EPA Vapor Action Levels (VALs) using a 0.03 attenuation factor.

⊕ = April 2014 ReadyEarth vapor point
PCE = tetrachloroethene
TCE = trichloroethene
VRSL = vapor risk screening level



Vapor Mitigation System as Installed on November 12, 2014



Drawing No.: 13-0702k
DWG Date: 3-25-15
Rev Date: 3-2-16
Drafted by: JEB

D.2.b Vapor Mitigation System Details Diagram
Former TLC Cleaning Facility
668 N. High Point Road
Madison, Wisconsin

D.3 Photographs

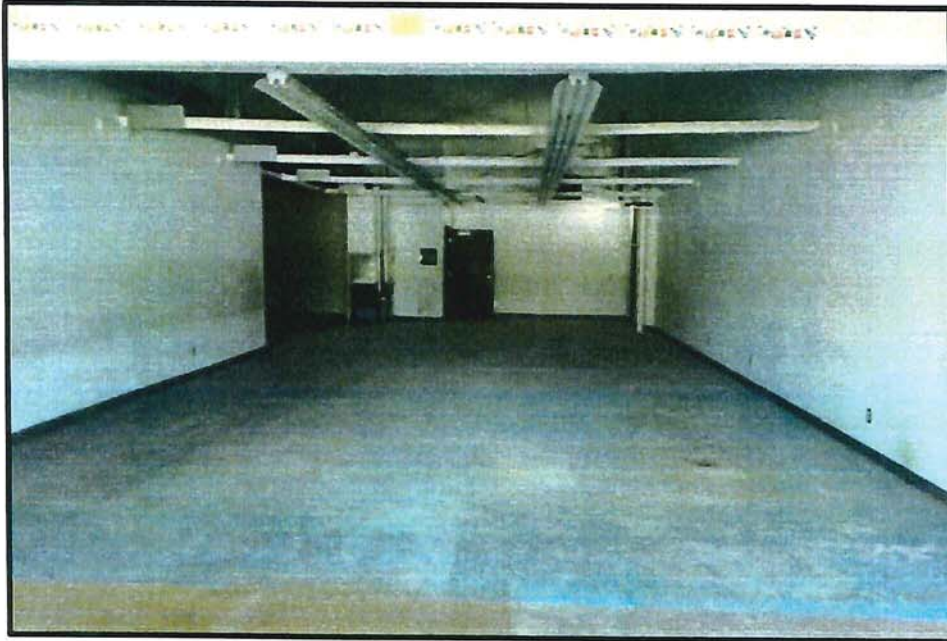


Photo 1 – Looking south at the interior of the former dry cleaning space. The dry cleaning business is no longer operational at the site. The dry cleaning machine formerly sat in the center background of the space shown in this photo.

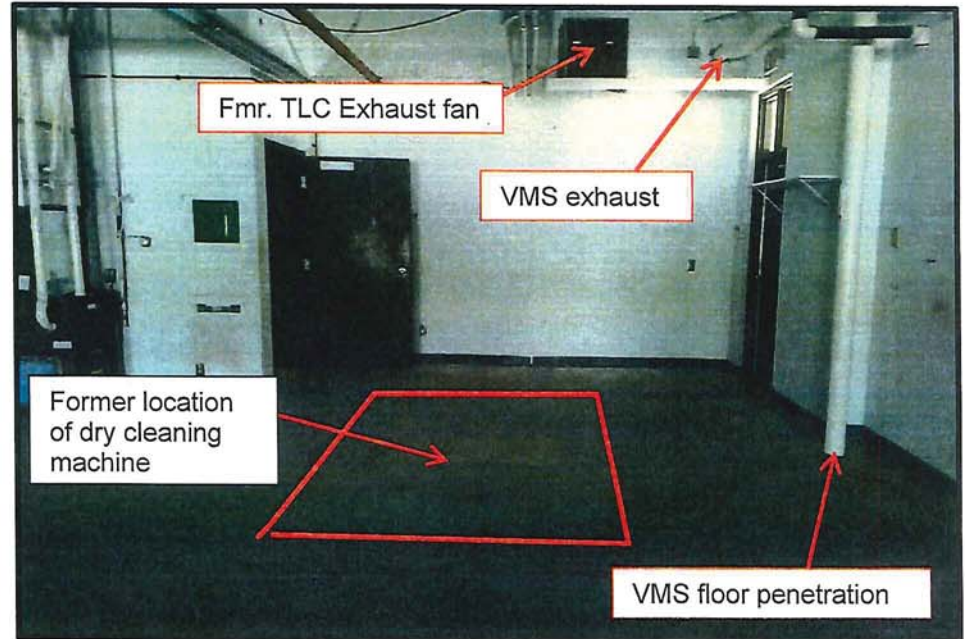


Photo 2 – This photograph was taken from a close up vantage compared to Photo 1 and shows the former location of the dry cleaning machine and the location of the VMS installed in November 2014.



Photo 3 – This photograph shows a close up of the floor penetration of the VMS. The floor penetration was sealed with a rubber gasket and caulk. The concrete is approximately 5 to 6 inches thick and approximately 5 inches of sub slab concrete was removed.

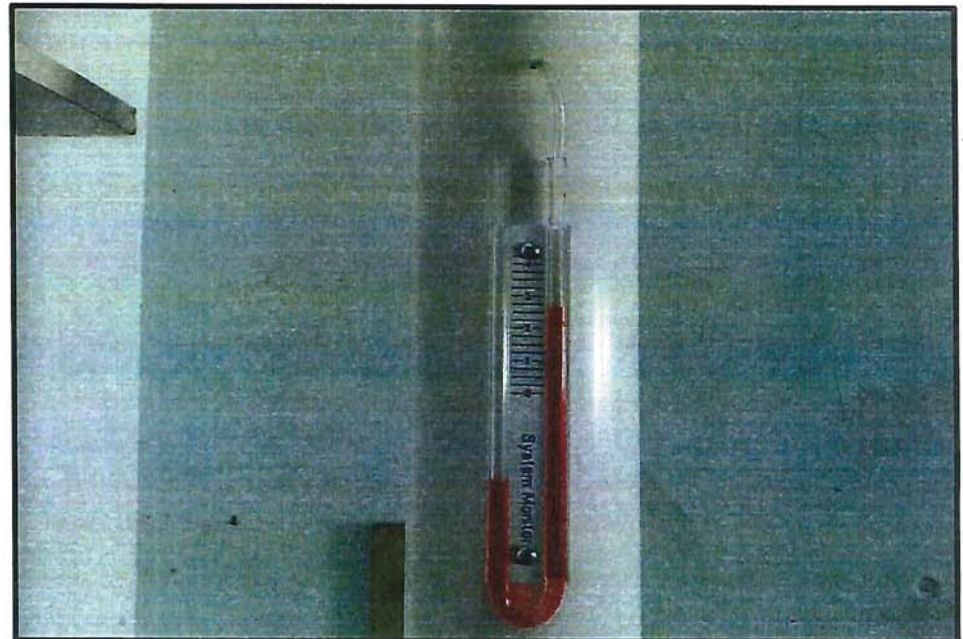


Photo 4 – This photograph shows a close up of the manometer showing that the system is operational.

D.3 Photographs

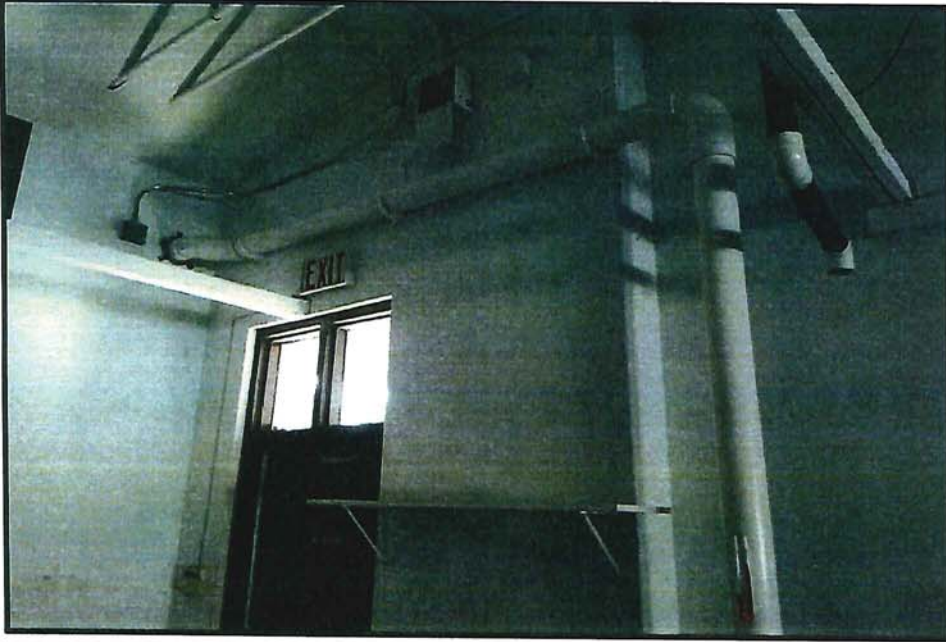


Photo 5 – This photograph shows the upper PVC piping of the VMS and the exit point through the wall. This photograph also shows that the exterior fan is hardwired to the internal power source.

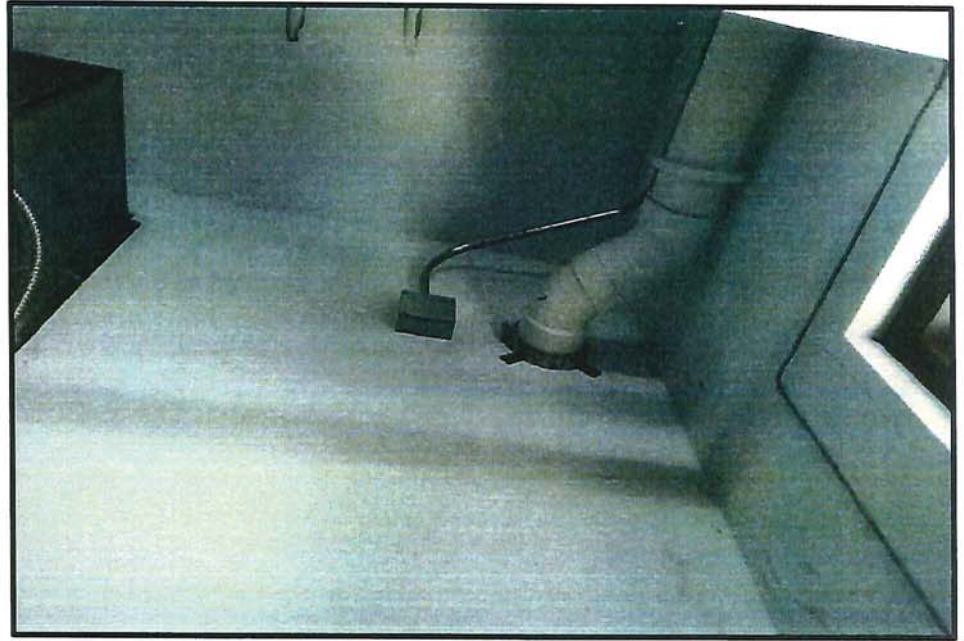


Photo 6 – This photograph shows a close up of the exit point and the interior electrical junction box.



Photo 7 – This photograph looks northeast and up at the exterior fan

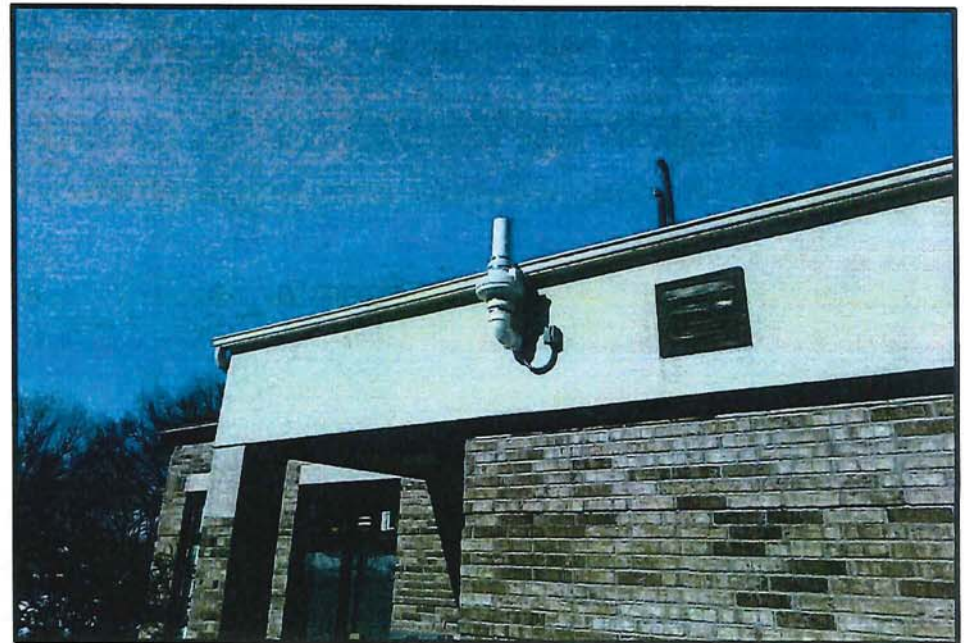


Photo 8 – This photograph looks at the same fan shown in Photo 7 and how the exhaust point terminates above the roof line.

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Former TLC Cleaning Facility	BRRTS No. 02-13-552185
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Inspections are required to be conducted (see closure approval letter):

annually
 semi-annually
 other – specify _____

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

3/9/16

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information			
BRRTS No.	VPLE No.		
02-13-552185			
Parcel ID No.			
070823212281			
FID No.	WTM Coordinates		
113268430	X 559151	Y 289202	
BRRTS Activity (Site) Name	WTM Coordinates Represent:		
Former TLC Dry Cleaning Inc.	<input type="checkbox"/> Source Area <input checked="" type="checkbox"/> Parcel Center		
Site Address	City	State	ZIP Code
668 N. High Point Road	Madison	WI	53717
Acres Ready For Use	1		

Responsible Party (RP) Name			
Tiffany Miller			
Company Name			
c/o Sauk Creek LLC (DERF agent)			
Mailing Address	City	State	ZIP Code
7941 Tree Lane	Madison	WI	53717
Phone Number	Email		
(608) 833-8100	tromano@flad-development.com		

Check here if the RP is the owner of the source property.

Environmental Consultant Name			
Jason Bartley			
Consulting Firm			
ReadyEarth Consulting, Inc.			
Mailing Address	City	State	ZIP Code
P.O. Box 365	Pewaukee	WI	53072
Phone Number	Email		
(262) 522-3520	jbartley@readyearth.net		

Fees and Mailing of Closure Request

1. Send a copy of page one of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR Regional EPA (Environmental Program Associate) at <http://dnr.wi.gov/topic/Brownfields/Contact.html>. Check all fees that apply:

- \$1,050 Closure Fee
- \$350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)
- \$300 Database Fee for Soil
- Total Amount of Payment \$ _____
- Resubmittal, Fees Previously Paid

2. Send one paper copy and one e-copy on compact disk of the entire closure package to the Regional Project Manager assigned to your site. Submit as unbound, separate documents in the order and with the titles prescribed by this form. For electronic document submittal requirements, see <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

Site Summary

If any portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

- A. Site Location: Describe the physical location of the site, both generally and specific to its immediate surroundings.
The site is described as being in the NW 1/4, NW 1/4, Section 23, T7N, R8E.

The site is a former dry cleaning business (approximately 1,400 ft²) located within a commercial strip mall (approximately 7,400 ft²). The address of the former dry cleaning business is 668 N. High Point Road in Madison, Wisconsin. The site is located at the southwest corner of the intersection of Old Sauk Road and N. High Point Road, just east of Hwy 12.
- B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.
ReadyEarth understands that the property was developed with the existing building in the 1990s (by at least 1995), and prior to that the property was undeveloped. The building is constructed slab-on-grade with no basement.

The dry cleaning operations ceased at the site as of June 2014, and all of the dry cleaning appurtenances have been removed from the site.
- C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
Planned Development
- D. Describe how and when site contamination was discovered.
The DNR was notified of impacts at the site in August 2008. Based on a site scoping investigation conducted from October 2011 through April 2013, tetrachloroethene (PCE) was detected in soils and sub-slab vapors at the site.
- E. Describe the type(s) and source(s) or suspected source(s) of contamination.
The source of the PCE impacts appears to be from past dry cleaning operations at the site. All of the dry cleaning appurtenances were removed from the site as of June 2014.
- F. Other relevant site description information (or enter Not Applicable).
Not applicable
- G. List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.
There are no other BRRTS activities at the site.
- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
There are no BRRTS activities for properties adjoining the site. There are no documented impacts to any adjoining property.

2. General Site Conditions

- A. Soil/Geology
- Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
Possible fill consisting of brown to gray clayey silt to silty clay is present from approximately 4 to 7 feet below ground surface (bgs). The possible fill overlies brown silty fine sand to approximately 14 feet bgs, brown sandy silt to approximately 16 to 19 feet bgs, light brown silty fine sand to approximately 31 to 34 feet bgs, and pale brown to brown fine sand to at least 68 feet bgs (the maximum depth investigated). Based on the water measurements, the soil column extends to approximately 58 feet bgs (measured low water level).
 - Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Possible fill may be present from approximately 4 to 7 feet bgs. The possible fill consists of brown to gray clayey silt to silty clay and would be considered exempt solid waste.
 - Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
Bedrock was not encountered during drilling to a maximum depth of approximately 68 feet bgs. According to various publications, bedrock is variable in the area of the site and may be present at depths greater than 100 feet bgs.
 - Describe the nature and locations of current surface cover(s) across the site (e.g., natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).
The site is a commercial strip mall. The building area is approximately 7,400 ft², the associated concrete aprons and asphalt parking areas comprise approximately 26,300 ft², and the perimeter grass/landscaped areas are approximately 6,500 ft².
- B. Groundwater

- i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, including high and low water table elevation and whether free product affects measurement of water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.
The measured low groundwater levels ranged from approximately 58.53 to 58.88 feet bgs. The depth to groundwater readings to date have shown minor variability, as the May 2014 groundwater readings were only approximately 0.2 feet higher than the August 2014 readings in each of the three wells. There is no free product at the site and the groundwater elevations do not appear to be affected by any artificial external conditions. The soil types within 10 feet above and below the saturated zone are relatively homogeneous fine sands.
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
Groundwater flow has been consistently to the north-northeast.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
The groundwater gradients exhibited at the site are 0.008 ft/ft. Hydraulic conductivity data was not collected for the site because the recharge was too rapid to allow for collection of reliable data through transmissivity testing. Based on the rapid recharge rate, the saturated soils likely exhibit hydraulic conductivities greater than 1×10^{-2} cm/sec.
- iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).
ReadyEarth did not identify any potable or municipal wells within 1,200 feet of the site.

3. Site Investigation Summary

A. General

- i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

Resource Engineering Associates, Inc. (REA) conducted the initial site scoping activities at the site. The site scoping consisted of collecting soil samples from two probeholes and a hand-augered boring advanced outside the building footprint in October 2011; collecting soil samples from two shallow borings advanced inside the building adjacent to the dry cleaning machine in April 2012; and collecting sub-slab vapor samples from two points advanced adjacent to the dry cleaning machine in April 2013.

ReadyEarth conducted the site investigation (SI) activities at the site. On March 26 and 27, 2014, ReadyEarth documented the drilling of three soil borings at the site, associated soil sampling, and conversion of the borings to NR 141 wells. During the drilling event, ReadyEarth also abandoned the two indoor sub-slab vapor points (non-compliant with RR-800 or RR-986) and installed three new sub-slab vapor points within the building. ReadyEarth collected sub-slab vapor samples on April 3, 2014. The ReadyEarth sub-slab vapor points were installed and sampled with procedures consistent with both RR-800 and RR-986. ReadyEarth collected groundwater samples on May 28 and August 12, 2014. During each event, ReadyEarth measured the depth to groundwater at each well, and during the initial event, ReadyEarth developed each well and surveyed the well network.

ReadyEarth summarized the sampling in a change order dated October 22, 2014 and detailed the sampling in a closure request dated March 26, 2015. The closure request recommended that further actions with respect to the soil and groundwater pathway were not warranted, other than GIS listing.

In a letter dated June 18, 2015, the DNR denied closure and required the following: 1.) submit a map showing utilities on the property; 2.) collect two additional rounds of vapor samples from VP-3 (summer and winter) to confirm the vapor pathway continued to be protected in that part of the building; and 3.) submit a new closure request. The DNR indicated that further actions are not warranted with respect to the soil or groundwater pathways (other than GIS listing) and authorized ReadyEarth to abandon the groundwater monitoring wells. ReadyEarth abandoned the wells and submitted the well abandonment documentation to the DNR in a letter dated January 29, 2016.

ReadyEarth has prepared the utility map, collected the two additional rounds of sub-slab vapor sampling from VP-3, and prepared this closure request to present the additional results. Although there have been no further actions with respect to soil or groundwater since the previous closure request (other than well abandonment) ReadyEarth has updated the sections of this closure request with respect to those pathways.

- ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.
The SI activities did not extend beyond the boundaries of the subject site. However, based on the overall low concentrations, impacts above enforcement standards (ESs) do not appear to have extended off site.

- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

There were no structural impediments to completing the SI or remediation activities, and there are no impediments that also serve as a performance standard.

B. Soil

- i. Describe degree and extent of soil contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways.

Degree and Extent:

PCE is the only compound detected in soil at the site, and minimal impacts have been detected at the site. Concentrations of PCE range from 34 to 69 parts per billion (ppb) and only within the top 10 feet bgs near the former dry cleaning machine and to the south-southwest. The site scoping also identified PCE in GB-1 at 27 to 30 feet bgs; however, the presence of PCE was not confirmed at any depth below 8 feet bgs during the SI at that same location (four samples below 8 feet bgs at B-2).

Due to the detection of PCE in groundwater, ReadyEarth presumes that the soil impacts identified beneath the former dry cleaning machine extend to the water table. The groundwater concentrations were so low that ReadyEarth did not consider further soil investigation necessary. As a result of their review of the initial closure request, the DNR has concurred that further soil investigation is not warranted.

Source and Receptors/Migration Pathways:

The source of the soil impacts at the site appears to be the former dry cleaning machine, as evidenced by the soil impacts detected in its immediate vicinity. The relatively deep groundwater and the homogeneous and permeable soil types appear to promote a preferential vertical migration pathway, and groundwater is a receptor. However, the groundwater concentrations are quite low, and the DNR has concurred that further groundwater investigation/sampling is not warranted.

- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column.
Only two out of five soil samples collected within the top 4 feet bgs revealed any concentration above detection limits. Both of those concentrations are orders of magnitude below the residual contaminant levels (RCLs) for the direct contact pathway.
- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site. This includes a soil performance standard established in accordance with s. NR 720.08, a Residual Contaminant Level (RCL) established in accordance with s. NR 720.10 that is protective of groundwater quality, or an RCL established in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.
ReadyEarth utilized the spreadsheet available on the DNR website to establish the RCLs utilized to evaluate the soil analytical results obtained from the site.

C. Groundwater

- i. Describe degree and extent of groundwater contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

Degree and Extent:

PCE is the only compound detected in groundwater at the site, and minimal impacts have been detected at the site. The two upgradient NR 141 wells (MW-2 and MW-3) consistently exhibited relatively low PCE concentrations above the preventive action limit (PAL) but below the ES (PCE ranged between 0.97J and 4.2 ppb). The downgradient well (MW-1) consistently exhibited relatively low PCE concentrations above the ES (PCE ranged between 9.5 and 11.1 ppb).

During the final round, the PCE in the downgradient well MW-1 was 9.5 ppb. Based on that low concentration, ReadyEarth estimates that the downgradient extent of groundwater impacts is contained within the boundaries of the site.

Source and Receptors/Migration Pathways:

The source of the groundwater impacts appears to be soil impacts that migrated vertically from the former dry cleaning machine to the water table. The relatively deep groundwater and the homogeneous and permeable soil types appear to promote a preferential vertical migration pathway, and minimal lateral impacts were observed in the perimeter soil and groundwater samples. The factors that limited lateral movement also limit the potential for preferential pathways such as utilities. ReadyEarth has not identified any utilities or foundation drain systems acting as migration pathways.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations. Identify the depth and location of the smear zone.
Free product has not been observed at the site, and there is no evidence of free product based on the relatively low soil and groundwater analytical results obtained to date.

D. Vapor

- i. Describe how the vapor migration pathway was assessed, including locations where vapor, soil gas, or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.
During the SI, ReadyEarth collected sub-slab vapor samples from VP-1 within 5 feet of the former dry cleaning machine (operating at the time of sampling but subsequently removed), from VP-2 approximately 25 feet east of the former dry cleaning machine, and from VP-3 approximately 55 feet east of the former dry cleaning machine.

In June 2015, the DNR authorized use of a 0.03 attenuation factor to determine vapor risk screening levels (VRSLs) from EPA indoor vapor action levels (VALs) for sub-slab vapor concentrations at small commercial buildings. Concentrations of PCE and TCE were detected in sub-slab vapors from VP-1 at concentrations above the VRSLs; PCE was detected in VP-2 at a concentration only slightly above (virtually at) the VRSL; and PCE was detected in VP-3 at a concentration well below (less than half) of the VRSL. It should be noted that although TCE was detected above its VRSL in VP-1, it was detected well below the VRSL in VP-2 (over 96% lower than the concentration at VP-1) and TCE was below detection limits at VP-3 during the initial sampling event. A vapor mitigation system (VMS) was installed at the site in November 2014 to mitigate the potential vapor intrusion pathway.

Subsequent to the initial closure request, the DNR required two additional rounds of sub-slab samples from VP-3 (one round from a summer month and one round from a winter month) to confirm that the VMS was continuing to mitigate sub-slab vapors in that area of the building. The PCE concentrations in the two subsequent rounds at VP-3 are generally consistent with the initial sampling event, and are approximately half of the VRSL. Overall, the PCE concentrations at VP-3 have ranged from 396 to 457 ppbv, which represent an approximate 88% to 89% decrease compared to the concentrations near the source. The additional sub-slab vapor sampling results from VP-3 confirm that the potential vapor pathway has been adequately addressed. ReadyEarth collected all sub-slab vapor samples in accordance with the current DNR guidance (publ. RR-986).

- ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).
ReadyEarth utilized the small commercial VRSLs available from the DNR website to evaluate the vapor risk pathway. The DNR has determined the small commercial VRSLs for sub-slab vapors by applying a 0.3 attenuation factor to the EPA indoor VALs for various compound. The VRSL for PCE is 900 ppbv and the VRSL for TCE is 53.

In VP-1, PCE was detected above its VRSL at a concentration of 3,660 ppbv, and TCE was detected above its VRSL at a concentration of 72.3 ppbv. In VP-2, PCE was detected only slightly above (virtually at) the VRSL at a concentration of 919 ppbv. In VP-3, PCE was detected at less than half of the VRSL (396 ppbv). The sub-slab PCE concentrations exhibited a clear and marked decreasing trend with distance from the former dry cleaning machine.

The two subsequent sampling rounds from VP-3 show the PCE sub-slab concentrations are generally consistent with the initial sampling event and are approximately half of the VRSL (453 and 457 ppbv).

E. Surface Water and Sediment

- i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.
No surface water or sediments are present at the site.
- ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.
No surface water or sediments are present at the site.

4. Remedial Actions Implemented and Residual Levels at Closure

- A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.
ReadyEarth documented the remedial action (VMS) in the closure request dated March 26, 2015. The DNR reviewed the closure request and concurred that active remedial actions are not warranted for the soil or groundwater pathways. This closure request includes the appropriate documentation to update the soil and groundwater GIS. The GIS fees were included with the original closure request.

Other than the GIS listing, the remedial action consisted of installing a VMS at the site to mitigate the potential vapor pathway. Details of the VMS construction were included with the initial closure request dated March 26, 2015.

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.
There were no immediate or interim actions taken at the site under ch. NR 708, Wis. Adm. Code.
- C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.
The remedial action consisted of installing a VMS at the site to mitigate the potential vapor pathway. The VMS consists of one drop point installed in the immediate vicinity of the former dry cleaning machine. The drop point is a vertical PVC riser that extends through the concrete flooring and into the subgrade base coarse. The riser is then routed laterally to the south building wall where the pipe exits to an exterior in-line fan that exhausts above the roof line of the building. Details of the VMS construction were included with the initial closure request dated March 26, 2015.
ReadyEarth conducted two rounds of sub-slab sampling at VP-3 subsequent to installing the VMS. The results of the sampling indicate that the sub-slab vapor PCE concentrations at VP-3 continue to be well below (approximately half of) the VRSL.
- D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation.
The remedial actions conducted at the site appropriately minimized the use of energy and resources.
- E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.
The nature of the impacts that will remain at the site at the time of closure is PCE impacts from the former dry cleaning operations at the site. The dry cleaning business is no longer operational at the site, and the dry cleaning machine has been removed from the property.

Soil:

The degree of detected soil impacts are limited to PCE concentrations ranging from 34 to 69 ppb within the top 10 feet bgs near the former dry cleaning machine and to the south-southwest. While ReadyEarth presumes that the soil impacts beneath the former location of the dry cleaning machine extend to the water table, the perimeter soil impacts are relatively minor and appear to be limited. The DNR has concurred that no further actions are warranted with regard to the soil impacts other than listing the site on the GIS.

Groundwater:

The degree of detected groundwater impacts is limited to relatively low PCE concentrations. The two upgradient NR 141 wells (MW-2 and MW-3) consistently exhibited relatively low PCE concentrations above PAL but below the ES (ranging from 0.97J to 4.2 ppb). The downgradient well (MW-1) consistently exhibited relatively low PCE concentrations above the ES (ranged from 9.5 to 11.1 ppb).

During the final round, the PCE in the downgradient well MW-1 was 9.5 ppb. Based on that low concentration, ReadyEarth estimates that the downgradient extent of groundwater impacts is contained within the boundaries of the site. The DNR has concurred that no further actions are warranted with regard to the groundwater impacts other than listing the site on the GIS. Per DNR authorization, ReadyEarth abandoned the monitoring wells at the site.

Vapor:

Although the PCE concentrations exhibited a clear and marked decrease with distance from the apparent source, the source PCE concentration was above the VRSLs for small commercial properties. The pre-VMS PCE concentration in sub-slab vapors near the former dry cleaning machine (VP-1) was 3,660 ppbv, and was 919 ppbv in VP-2 located 25 feet east of the former dry cleaning machine. ReadyEarth documented the installation of a VMS to mitigate the potential vapor pathway.

The additional sampling results from VP-3 located approximately 55 feet east of the former dry cleaning machine indicate that the PCE concentrations continue to be approximately half of the VRLS. The PCE concentrations have consistently ranged from 396 to 457 ppbv, which represent an approximate 88% to 89% decrease compared to the concentrations near the source. The additional sub-slab vapor sampling results from VP-3 confirm that the potential vapor pathway has been adequately addressed.

- F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact.
All detected concentrations within the top 4 feet bgs are well below the RCLs for the direct contact pathway.

- G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.
The confirmed PCE soil concentrations are present from 6 to 10 feet bgs at estimated concentrations ranging from 34 ppb to 52 ppb in GB-1 and SI boring B-2 (20 feet southwest of the former dry cleaning machine); from 2.5 to 5 feet bgs at an estimated concentration of 40 ppb in GB-2 (20 feet south-southwest of the former dry cleaning machine); and at 3 feet bgs at a concentration of 69 ppb in site scoping boring B-2 (within 5 feet of the former dry cleaning machine).
- While ReadyEarth presumes that the soil impacts beneath the former location of the dry cleaning machine extend to the water table, the perimeter soil impacts are relatively minor and appear to be limited. The DNR has concurred that no further actions are warranted with regard to the soil impacts other than listing the site on the GIS.
- H. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.
Based on the sampling conducted to date, no remedy is required for the soil or groundwater impacts detected at the site. The DNR has concurred that listing the site on the GIS is an appropriate final remedy for those impacts. Per DNR authorization, ReadyEarth abandoned the wells and this closure request includes the appropriate documentation to update the soil and groundwater GIS. The GIS fees were included with the original closure request.
- The vapor pathway is being addressed by the continuing operation of the VMS. The additional sub-slab vapor sampling has confirmed that the the potential vapor pathway has been adequately addressed. A draft maintenance plan for operation of the VMS is included in Attachment D.
- I. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume).
Overall, the groundwater concentrations are relatively low and stable. The PCE concentrations have ranged from 0.97J ppb to 11.1 ppb in the three wells. Based on those low concentrations, natural attenuation should be capable of limiting and reducing the groundwater impacts.
- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
Based on the sampling conducted to date, no remedy is required for the soil or groundwater impacts detected at the site. The DNR has concurred that listing the site on the GIS is an appropriate final remedy for those impacts. Per DNR authorization, ReadyEarth abandoned the wells and this closure request includes the appropriate documentation to update the soil and groundwater GIS. The GIS fees were included with the original closure request.
- The vapor pathway is being addressed by the continuing operation of the VMS. The additional sub-slab vapor sampling has confirmed that the the potential vapor pathway has been adequately addressed. A draft maintenance plan for operation of the VMS is included in Attachment D.
- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
The VMS will remain at the site under a maintenance plan to mitigate the potential vapor intrusion pathway. A draft maintenance plan for operation of the VMS is included in Attachment D.
- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.
The final round of groundwater data indicated PCE groundwater impacts at MW-1 (9.5 ppb) are above the ES. As such, the site will be listed on the groundwater GIS, which will also include information regarding the PCE concentrations above the PAL but below the ES at MW-2 (3.7 ppb) and MW-3 (1.1 ppb). ReadyEarth understands that exemptions are not necessary because the impacts are being addressed by the action of listing the site in the GIS.
- M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.
PCE and TCE were detected in sub-slab vapors in VP-1 (located within 5 feet of the former dry cleaning machine) at concentrations of 3,660 ppbv and 72.3 ppbv, respectively; PCE was detected in VP-2 (located 25 feet east of the former dry cleaning machine) at a concentration of 919 ppb. Those sub-slab vapor concentrations are above the small commercial VRSLs.
- A VMS was installed at the site to mitigating the potential vapor intrusion pathway. The additional sub-slab vapor sampling at VP-3 confirm that the potential vapor pathway has been adequately addressed.
- N. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.
No surface water or sediments are present at the site.

5. Continuing Obligations: Situations where sites, including all affected properties and rights-of-way (ROWs), are included on the DNR's GIS Registry. In certain situations, maintenance plans are also required, and must be included in Attachment D.

Directions: For each of the 3 property types below, check all situations that apply to this closure request.
(NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

This situation applies to the following property or Right of Way (ROW):			Case Closure Situation - Continuing Obligation Inclusion on the GIS Registry is Required (ii. - xiv.)	Maintenance Plan Required	
Property Type:					
Source Property	Affected Property (Off-Source)	ROW			
i.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	None of the following situations apply to this case closure request.	NA
ii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 RCLs.	NA
iv.				Monitoring Wells Remain:	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	• Not Abandoned (filled and sealed)	NA
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	• Continued Monitoring (requested or required)	Yes
v.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes
vi.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment: impedes completion of investigation or remedial action (not as a performance standard cover)	NA
viii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes
x.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Commercial/industrial exposure assumptions used.	NA
xiii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site-specific situation: (e. g., fencing, methane monitoring, other) (<i>discuss with project manager before submitting the closure request</i>)	Site specific

6. Underground Storage Tanks

- A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? Yes No
- B. Do any upgraded tanks meeting the requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property? Yes No
- C. If the answer to question 6.B. is yes, is the leak detection system currently being monitored? Yes No

General Instructions

All information shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected. For each attachment (A-G), provide a Table of Contents page, listing all 'applicable' and 'not applicable' items by Closure Form titles (e.g., A.1. Groundwater Analytical Table, A.2. Soil Analytical Results Table, etc.). If any item is 'not applicable' to the case closure request, you must fully explain the reasons why.

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e., do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15 (3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (PDF).

A. Data Tables

- A.1. Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates for all groundwater sampling points (e.g., monitoring wells, temporary wells, sumps, extraction wells, potable wells) for which samples have been collected.
- A.2. Soil Analytical Results Table(s):** Table(s) showing all soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).
- A.3. Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.
- A.4. Vapor Analytical Table(s):** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.5. Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, and time period for sample collection.
- A.6. Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.7. Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps, Figures and Photos (Attachment B)

Directions for Maps, Figures and Photos:

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc.).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.

B.1. Location Maps

- B.1.a. Location Map:** A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.
- B.1.c. RR Sites Map:** From RR Sites Map ([http://dnrmaps.wi.gov/si/?Viewer=RR Sites](http://dnrmaps.wi.gov/si/?Viewer=RR%20Sites)) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

- B.2.a. **Soil Contamination:** Figure(s) showing the location of **all** identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).
- B.2.b. **Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedance (0-4 foot depth).

B.3. Groundwater Figures

- B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:
- Source location(s) and vertical extent of residual soil contamination exceeding an RCL. Distinguish between direct contact and the groundwater pathway RCLs.
 - Source location(s) and lateral and vertical extent if groundwater contamination exceeds ch. NR 140 ES.
 - Surface features, including buildings and basements, and show surface elevation changes.
 - Any areas of active remediation within the cross section path, such as excavations or treatment zones.
 - Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1.b.)
- B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, PAL and/or an ES. Indicate the date and direction of groundwater flow based on the most recent sampling data.
- B.3.c. **Groundwater Flow Direction:** Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.
- B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been abandoned.

B.4. Vapor Maps and Other Media

- B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway in relation to residual soil and groundwater contamination, including sub-slab, indoor air, soil vapor, soil gas, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.
- B.4.b. **Other media of concern (e.g., sediment or surface water):** Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.
- B.4.c. **Other:** Include any other relevant maps and figures not otherwise noted above. (This section may remain blank).

- B.5. **Structural Impediment Photos:** One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)

Directions for Documentation of Remedial Action:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc.).
- If the documentation requested below has already been submitted to the DNR, please note the title and date of the report for that particular document requested.
 - C.1. **Site investigation documentation**, that has not otherwise been submitted with the Site Investigation Report.
 - C.2. **Investigative waste** disposal documentation.
 - C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.
 - C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
 - C.5. **Decommissioning of Remedial Systems.** Include plans to properly abandon any systems or equipment.
 - C.6. **Other.** Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)

Directions for Maintenance Plans and Photographs:

Attach a maintenance plan for each affected property (source property, each off-source affected property) with continuing obligations requiring future maintenance (e.g., direct contact, groundwater protection, vapor intrusion). See Site Summary section 5 for all affected property(s) requiring a maintenance plan. Maintenance plan guidance and/or templates for: 1) Cover/barrier systems; 2) Vapor intrusion; and 3) Monitoring wells, can be found at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html#tabx3>

- D.1. **Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**
- Provide brief descriptions of the type, depth and location of residual contamination.

- Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
 - Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
 - Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.
- D.2. **Location map(s) which show(s):** (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) all property boundaries.
- D.3. **Photographs** for site or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system, include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf>.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:

For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)

Select One:

- No monitoring wells were installed as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
 - Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.
 - One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason (s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.
 - One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:

Label documents with the specific closure form titles (e.g., F.1. Deed, F.2. Certified Survey Map, etc.). Include all of the following documents, in the order listed:

- F.1. **Deed:** The most recent deed with legal description clearly listed.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- F.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- F.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)**Directions for Notifications to Owners of Affected Properties:**

Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31- 19.39, Wis. Stats.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements <http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf>.

State law requires that the responsible party provide a 30-day, written advance notification to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at <http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf>

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation. (These items will not be placed on the GIS Registry.)

Include the following documents for each property, keeping each property's documents grouped together and labeled with the letter G and the corresponding ID number from the table on the following page. (Source Property documents should only be included in Attachment F):

- **Deed:** The most recent deed with legal descriptions clearly listed for all affected properties.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Signatures and Findings for Closure Determination

Check the correct box for this case closure request, and have either a professional engineer or a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code, sign this document.

- A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies).
- The response action(s) for this site addresses media other than groundwater.

Engineering Certification

I _____ hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this case closure request has been prepared by me or prepared under my supervision in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."


Printed Name Title

Signature Date P.E. Stamp and Number

Hydrogeologist Certification

I Jason E. Bartley hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Jason E. Bartley President - ReadyEarth Consulting, Inc.
Printed Name Title

 3-3-16
Signature Date



Attachment A: Data Tables

A.1 Groundwater Analytical Table

A.2 Soil Analytical Results Table

A.3 Residual Soil Contamination Table

A.4 Vapor Analytical Table

A.5 Other Media of Concern (e.g. sediment or surface water) – no attachment. There are no impacts to other media, such as sediments or surface water, at the site.

A.6 Water Level Elevations

A.7 Other – no attachment. All pertinent information obtained for the site is included in the other attachments.

A.1 Groundwater Analytical Table
 Former TLC Dry Cleaning, Inc.
 668 N. High Point Road - Madison, Wisconsin

Sample ID	Site Investigation Samples						NR 140 PALs (ppb)	NR 140 ESs (ppb)
	MW-1		MW-2		MW-3			
	5/28/14	8/12/14	5/28/14	8/12/14	5/28/14	8/12/14		
Sample Date	5/28/14	8/12/14	5/28/14	8/12/14	5/28/14	8/12/14		
Chlorinated Volatile Organic Compounds (VOCs) (µg/kg)								
cis-1,2-dichloroethene	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<i>7</i>	70
trans-1,2-dichloroethene	<0.24	<0.26	<0.24	<0.26	<0.24	<0.26	<i>20</i>	100
tetrachloroethene	11.1	9.5	<i>4.2</i>	<i>3.7</i>	<i>0.97 J</i>	<i>1.1</i>	<i>0.5</i>	5
trichloroethene	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33	<i>0.5</i>	5
vinyl chloride	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18	<i>0.02</i>	0.2

Notes:

1. Only the detected and typical chlorinated VOCs are shown.
2. Concentrations in *blue italics* exceed their respective preventive action limits (PALs).
3. Concentrations in **red bold** exceed their respective enforcement standards (ESs)
4. "J" denotes an estimated concentration between the method detection limit and the reporting limit.

A.2 Soil Analytical Results Table
Former TLC Dry Cleaning, Inc.
668 N. High Point Road - Madison, Wisconsin

Sample ID	Site Scoping Samples						DNR RCL GW path.	DNR RCL DC path.
	GB-1	GB-2	HB-1	B-1	B-2			
Sample Date	10/25/11	10/25/11	10/25/11	10/31/11	4/21/12	4/21/12		
Sample Depth	6-10	27-30	2.5-5	3	3	3		
saturated/unsaturated	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.		
Chlorinated Volatile Organic Compounds (VOCs) (µg/kg)								
cis-1,2-dichloroethene	<25	<27	<31	<30	<11	<13	41.2	156,000
trans-1,2-dichloroethene	<25	<27	<31	<30	<14	<16	58.8	211,000
tetrachloroethene	34 J	45 J	40 J	<30	<11	69	4.5	30,700
trichloroethene	<25	<27	<31	<30	<7.7	<8.9	3.6	644
vinyl chloride	<25	<27	<31	<30	<6.4	<7.4	0.1	67

Sample ID	Site Investigation Samples									DNR RCL GW path.	DNR RCL DC path.		
	B-1		B-2					B-3					
Sample Date	3/26/14	3/26/14	3/26/14	3/26/14	3/26/14	3/27/14	3/27/14	3/27/14	3/27/14	3/27/14	3/27/14		
Sample Depth	29-31	49-51	2-4	6-8	14-16	28-30	44-46	54-56	6-8	28-30	54-56		
saturated/unsaturated	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.	unsat.		
Chlorinated Volatile Organic Compounds (VOCs) (µg/kg)													
cis-1,2-dichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	41.2	156,000
trans-1,2-dichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	58.8	211,000
tetrachloroethene	<25.0	<25.0	<25.0	52.0 J	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	4.5	30,700
trichloroethene	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	3.6	644
vinyl chloride	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	0.1	67

Notes:

1. Only the detected and typical chlorinated VOCs are shown.
2. Concentrations in *blue italics* exceed their respective SSRCLs for the groundwater pathway.
3. Concentrations in **red bold** exceed their respective SSRCLs for the direct contact pathway (only within the top 4 feet bgs).
4. SSRCLs were obtained from the DNR R&R Program RCL Spreadsheet available on their website.
5. Site Scoping results obtained from Resource Engineering Associates site scoping laboratory reports.
6. "J" denotes an estimated concentration between the method detection limit and the reporting limit.

A.3 Residual Soil Contamination Table

Former TLC Dry Cleaning, Inc.
668 N. High Point Road - Madison, Wisconsin

Sample ID	Site Scoping				SI	DNR RCL GW path.	DNR RCL DC path.
	GB-1	GB-2	B-2	B-2	B-2		
Sample Date	10/25/11	10/25/11	10/25/11	4/21/12	3/26/14		
Sample Depth	6-10	27-30	2.5-5	3	6-8		
saturated/unsaturated	unsat.	unsat.	unsat.	unsat.	unsat.		
Chlorinated Volatile Organic Compounds (VOCs) (µg/kg)							
tetrachloroethene	<i>34 J</i>	<i>45 J</i>	<i>40 J</i>	<i>69</i>	<i>52.0 J</i>	<i>4.5</i>	30,700

Notes:

1. Only the VOCs detected above SSRCLs are shown.
2. Concentrations in *blue italics* exceed their respective SSRCLs for the groundwater pathway.
3. Concentrations in **red bold** exceed their respective SSRCLs for the direct contact pathway (only within the top 4 feet bgs).
4. SSRCLs were obtained from the DNR R&R Program RCL Spreadsheet available on their website.
5. Site Scoping results obtained from Resource Engineering Associates site scoping laboratory reports.
6. "J" denotes an estimated concentration between the method detection limit and the reporting limit.

A.4 Vapor Analytical Table
Former TLC Dry Cleaning, Inc.
668 N. High Point Road - Madison, Wisconsin

Sample ID	Site Scoping		Site Investigation Samples					Background	small commercial VRSL
	B-1	B-2	VP-1	VP-2	VP-3				
Sample location description	west of fmr. dry cleaning mach.	east of fmr. dry cleaning mach.	west of fmr. dry cleaning mach.	w/i fmr. TLC 25' east of fmr. mach.	outside fmr. TLC footprint within mechanical room 53' east of fmr. Dry cleaning machine			SE portion of parking lot	
Sample Date	4/1/13	4/1/13	4/3/14	4/3/14	4/3/14	9/11/15	2/3/16	4/3/14	
start time	930	944	1110	1045	1000	735	1048	1030	
end time	1001	1018	1200	1130	1045	820	1133	1115	
Shut-In Test	pass	pass	pass	pass	pass	pass	pass	pass	
Helium Shroud Test	pass	pass	pass	pass	pass	pass	pass	pass	
PID Reading	1.8	0	1.4	<1	<1	35	<1		
Volatile Organic Compounds (VOCs) (µg/kg)									
cis-1,2-dichloroethene	<1,000	<400	5.9	<0.67	<0.67	<2.8	<0.28	<0.67	NS
trans-1,2-dichloroethene	<1,000	<400	1.0	<0.67	<0.67	<2.8	<0.28	<0.67	NS
tetrachloroethene	1,560	756	3,660	919	396	453	457	2.1	900
trichloroethene	<1,000	<400	72.3	2.6	<0.67	<1.4	0.23	<0.67	53
vinyl chloride	<1,000	<400	<0.67	<0.67	<0.67	<7.0	<0.14	<0.67	366

Notes:

- Concentrations in **red bold** exceed their respective small commercial vapor risk screening levels (VRSLs).
- The sub-slab samples were collected with 6-liter summa canisters and sampling apparatus to allow for shut-in and helium shroud tests. Dedicated flow controllers maintained sample rates of 200ml/min or less and all samples were allowed to run for at least 40 minutes.
- Shut-in tests included applying a vacuum of ~100 in-water (~7 in-Hg) to the closed-system sample chain to check valve connections. The shut-in tests passed if no dissipation was noted over at least 1 minute.
- Helium shroud tests introduced at least 40% by volume of He to a shroud placed over the sample apparatus valve penetrating the floor to check seal. The He shroud tests passed if less than 5% helium was detected within sample chain.
- VRSLs were obtained from the DNR Quick Look-Up Table based on the EPA regional screening tables for indoor vapor action levels (VALs): http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm.
- The VRSLs were determined from the VALs using an attenuation factor of 0.03.
- All samples were analyzed by Pace Analytical using the TO-15 method.

A.6 Water Level Elevations

Former TLC Dry Cleaning Inc.
668 N. High Point Road - Madison, Wisconsin

Well Number	Date	¹ Total Well Depth	Ground Surface Elevation	¹ Top of Casing Elevation	² Depth to Water Below Ground	¹ Depth to Water Below Casing	Groundwater Elevation
MW-1	5/28/14	67.03	99.26	99.00	58.88	58.62	40.38
	8/12/14				58.68	58.42	40.58
MW-2	5/28/14	67.36	100.08	99.98	58.73	58.63	41.35
	8/12/14				58.53	58.43	41.55
MW-3	5/28/14	67.42	100.30	100.10	58.88	58.68	41.42
	8/12/14				58.69	58.49	41.61

Notes:

1. All measurements are presented in feet.
2. "¹" Measured from the north rim of the top of well casing.
3. "²" Calculated based on depth to water measurements and survey results.

Attachment B: Maps, Figures and Photos

B.1 Location Maps

B.1.a Location Map

B.1.b Detailed Site Map

B.1.c RR Sites Map

B.2 Soil Figures

B.2.a Soil Contamination

B.2.b Residual Soil Contamination

B.3 Groundwater Figures

B.3.a Geologic Cross-Section Figure

B.3.b Groundwater Isoconcentration

B.3.c.1 Groundwater Flow Direction (May 2014)

B.3.c.2 Groundwater Flow Direction (August 2014)

B.3.d Monitoring Wells

B.4 Vapor Maps and Other Media

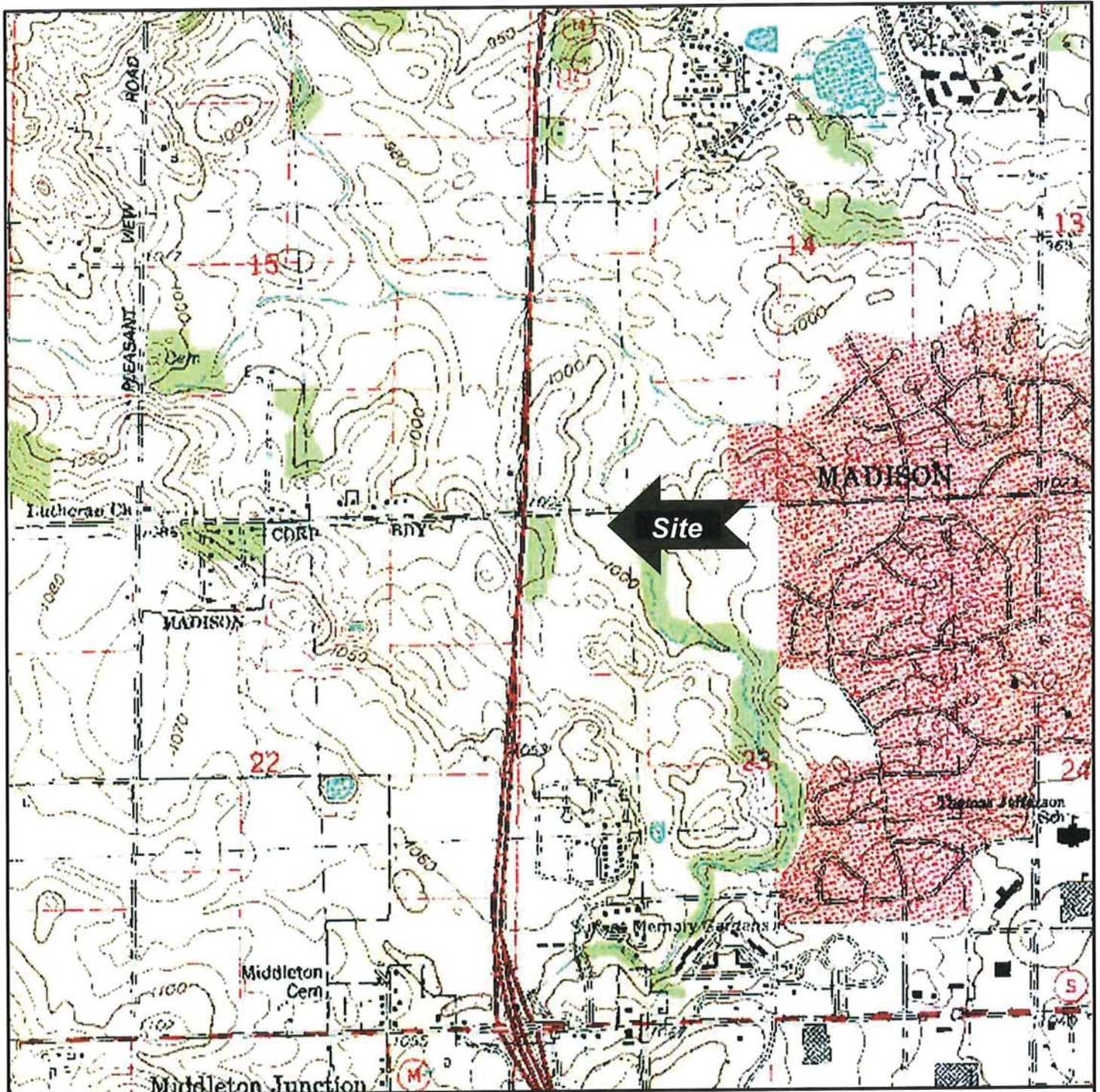
B.4.a Vapor Intrusion Map

B.4.b Other Media of Concern (e.g. sediment or surface water) – no attachment.

There are no impacts to other media such as sediment or surface water.

B.4.c Other – no attachment. All pertinent information obtained for the site is included in the other attachments.

B.5 Structural Impediment Photos – no attachment. There were no structural impediments that precluded a complete site investigation or remediation at the site.



Scale
1" ~ 1,500



NW 1/4 of the NW 1/4 of Section 23, Township 7N, Range 8E
Middleton Quadrangle
1983

Wisconsin – Dane Co.
7.5 Minute Series (Topographic)
United States Department of the Interior Geological Survey



B.1.a Location Map
Former TLC Dry Cleaning, Inc.
668 N. High Point Road
Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary
buried private electric

B-1/MW-1

asphalt parking

storm sewer

asphalt parking

High Point Road

storm sewer

fmr. dry cleaning machine (removed)

mechanical room

water

storm sewer

concrete sidewalk

VP-1

B-1

VP-2

B-2

HVAC fenced enclosure

VP-3

water

sanitary sewer

water

natural gas

B-2/MW-2

GB-1

GB-2

B-3/MW-3

sanitary sewer

storm sewer

trash enclosure

buried elec.

sanitary sewer

asphalt parking

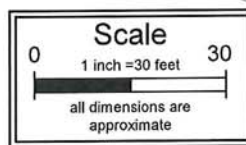
sanitary sewer

water

approximate property boundary

light pole (typ)

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- = water utility
- = sewer utility
- = natural gas utility
- = electric utility (buried)
- = communications utility (buried)



Drawing No.: 13-0702b

DWG Date: 7-23-13

Rev Date: 3-2-16

Drafted by: JEB

B.1.b Detailed Site Map
 Former TLC Cleaning Facility
 668 High Point Road
 Madison, Wisconsin



B.1.c RR Site Map



Legend

- Open Site (ongoing cleanup)
- Closed Site (completed cleanup)
- Cities
- Villages

0.0 0 0.02 0.0 Miles

NAD_1983_HARN_Wisconsin_TM

© Latitude Geographics Group Ltd.

1: 1,512

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/org/legal/>

Note: Not all sites are mapped.

Notes

TLC Dry Cleaning Inc.
668 N. High Point Road
Madison, Wisconsin
BRRTS No. 02-13-552185

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

High Point Road

asphalt parking

B-1/MW-1

asphalt parking

concrete sidewalk

B-2		
3-26-14	6-8	
PCE	52.0 J	

fmr. dry cleaning machine (removed)

B-2		
4-21-12	3	
PCE	69	

VP-1

VP-2

mechanical room

B-1

B-2

HVAC fenced enclosure

VP-3

B-2/MW-2

B-3/MW-3

trash enclosure

GB-1

GB-2

approximate extent of soil impacts above RCLs

asphalt parking

GB-2		
10-25-11	2.5-5	
PCE	40 J	

GB-1		
10-25-11	6-10	27-30
PCE	34 J	45 J

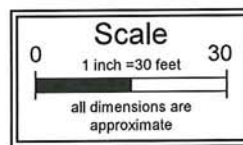
approximate property boundary

light pole (typ)

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- PCE = tetrachloroethene
- - - = approximate extent of soil impacts above RCLs

Notes:

- 1.) concentrations in *blue italics* attain or exceed the RCL for the groundwater pathway.
- 2.) "J" denotes an estimated concentration between the method detection limit and the reporting limit.



Drawing No.: 13-0702f

DWG Date: 2-3-15

Rev Date: 3-2-16

Drafted by: JEB

B.2.a Soil Contamination
Former TLC Cleaning Facility
668 High Point Road
Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

asphalt parking

B-1/MW-1

asphalt parking

High Point Road

concrete sidewalk

B-2		
3-26-14	6-8	
PCE	<i>52.0 J</i>	

fmr. dry cleaning machine (removed)

B-2		
4-21-12	3	
PCE	<i>69</i>	

VP-1

B-1

VP-2

B-2

VP-3

HB-1

B-2/MW-2

GB-1

GB-2

B-3/MW-3

mechanical room

trash enclosure

HVAC fenced enclosure

asphalt parking

approximate extent of soil impacts above RCLs

approximate property boundary

light pole (typ)

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

asphalt parking

trash enclosure

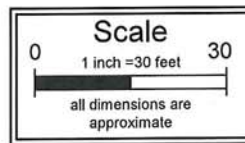
GB-2		
10-25-11	2.5-5	
PCE	<i>40 J</i>	

GB-1		
10-25-11	6-10	27-30
PCE	<i>34 J</i>	<i>45 J</i>

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- PCE = tetrachloroethene
- - - = approximate extent of soil impacts above RCLs

Notes:

- 1.) concentrations in *blue italics* attain or exceed the RCL for the groundwater pathway.
- 2.) "J" denotes an estimated concentration between the method detection limit and the reporting limit.



Drawing No.: 13-07021

DWG Date: 3-2-16

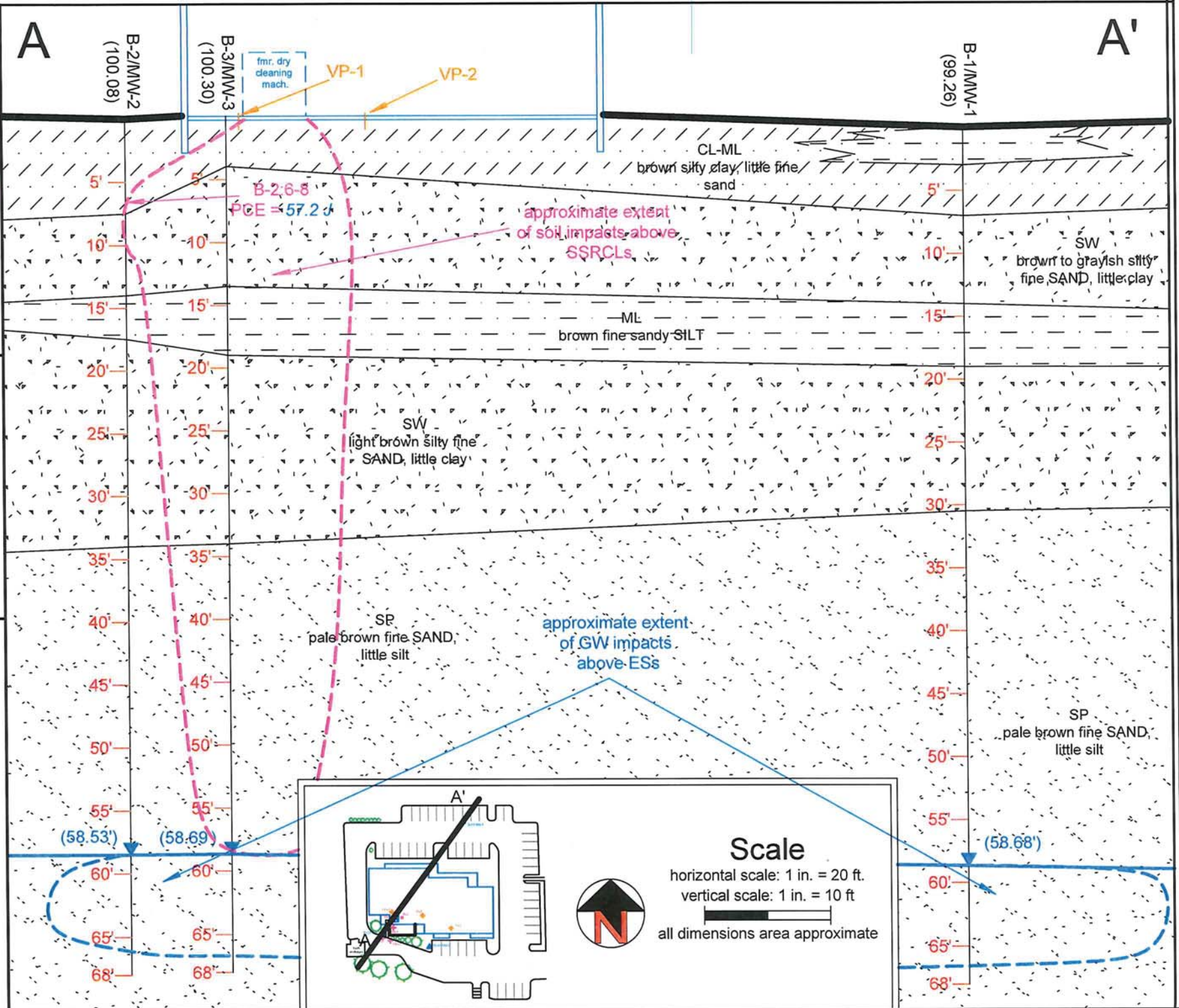
Rev Date:

Drafted by: JEB

B.2.b Residual Soil Contamination
Former TLC Cleaning Facility
668 High Point Road
Madison, Wisconsin

Drawing No.: 13-0702e
 DWG Date: 2-2-15
 Rev Date: 3-2-16
 Drafted by: JEB

B.3.a Geologic Cross-Section Figure
 Former TLC Dry Cleaning, Inc.
 668 N. High Point Road
 Madison, Wisconsin



Old Sauk Road

grass

concrete sidewalk

approximate property boundary

High Point Road

concrete sidewalk

asphalt parking

asphalt parking

asphalt parking

MW-1	PCE
5-28-14	11.1
8-12-14	9.5

B-1/MW-1

GW flow
5-28-14

GW flow
8-12-14

MW-2	PCE
5-28-14	4.2
8-12-14	3.7

fmr. dry cleaning
machine
(removed)

mechanical
room

VP-1

VP-2

VP-3

B-1

B-2

HB-1

B-2/MW-2

GB-1

GB-2

B-3/MW-3

trash enclosure

approximate extent of
GW impacts above PAL
(GW~59 feet bgs)

MW-3	PCE
5-28-14	0.97 J
8-12-14	1.1

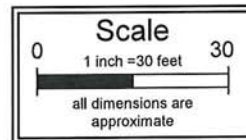
approximate property boundary

light pole
(typ)

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point
- PCE = tetrachloroethene
- (dashed blue line) = approximate extent of groundwater impacts above PAL

Notes:

- 1.) concentrations in *blue italics* attain or exceed the PAL.
- 2.) concentrations in **red bold** attain or exceed the ES.
- 3.) "J" denotes an estimated concentration between the method detection limit and the reporting limit.



Drawing No.: 13-0702g

DWG Date: 2-3-15

Rev Date: 3-2-16

Drafted by: JEB

B.3.b Groundwater Isoconcentration
Former TLC Cleaning Facility
668 High Point Road
Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

asphalt parking

(40.38)

B-1/MW-1

asphalt parking

40.40

40.60

40.80

41.00

41.20

41.40

High Point Road

concrete sidewalk

fm. dry cleaning machine (removed)

mechanical room

HVAC fenced enclosure

B-2/MW-2 (41.35)

B-3/MW-3 (41.42)

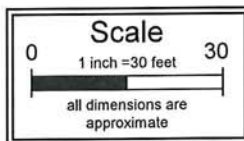
trash enclosure

asphalt parking

approximate property boundary

light pole (typ)

-  = March 2014 ReadyEarth SI monitoring well
- = groundwater elevation (May 2014)
-  = groundwater elevation contour (dashed where inferred)
- contour interval = 0.2 foot
-  = inferred groundwater flow direction



Drawing No.: 13-0702c

DWG Date: 10-14-14

Rev Date: 3-2-16

Drafted by: JEB

B.3.c.1 Groundwater Flow Direction (May 2014)

Former TLC Cleaning Facility
668 High Point Road
Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

High Point Road

asphalt parking

(40.50)

B-1/MW-1

asphalt parking

40.60

40.80

41.00

41.20

41.40

41.60

fm. dry cleaning machine (removed)

mechanical room

HVAC fenced enclosure

B-2/MW-2 (41.55)

B-3/MW-3 (41.61)




concrete sidewalk

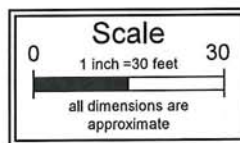
trash enclosure

asphalt parking

approximate property boundary

light pole (typ)

-  = March 2014 ReadyEarth SI monitoring well
- = groundwater elevation (August 2014)
-  = groundwater elevation contour (dashed where inferred)
- contour interval = 0.2 foot
-  = inferred groundwater flow direction



Drawing No.: 13-0702d

DWG Date: 10-14-14

Rev Date: 3-2-16

Drafted by: JEB

B.3.c.2 Groundwater Flow Direction

(August 2014)

Former TLC Cleaning Facility

668 High Point Road

Madison, Wisconsin

Old Sauk Road

grass

concrete sidewalk

approximate property boundary

all monitoring wells were abandoned on 11-2-15

B-1/MW-1

asphalt parking

High Point Road

asphalt parking

fmr. dry cleaning machine (removed)

VP-1

VP-2

mechanical room

VP-3

B-2/MW-2

B-1

B-2

HB-1

GB-1

GB-2

B-3/MW-3

concrete sidewalk

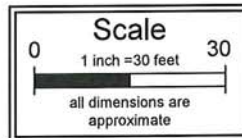
trash enclosure

asphalt parking

approximate property boundary

light pole (typ)

- ⊕ = October 2011 REA site scoping soil probe/hand auger
- = April 2012 REA site scoping soil boring
- ▲ = March 2014 ReadyEarth SI monitoring well
- ⊕ = April 2014 ReadyEarth vapor point



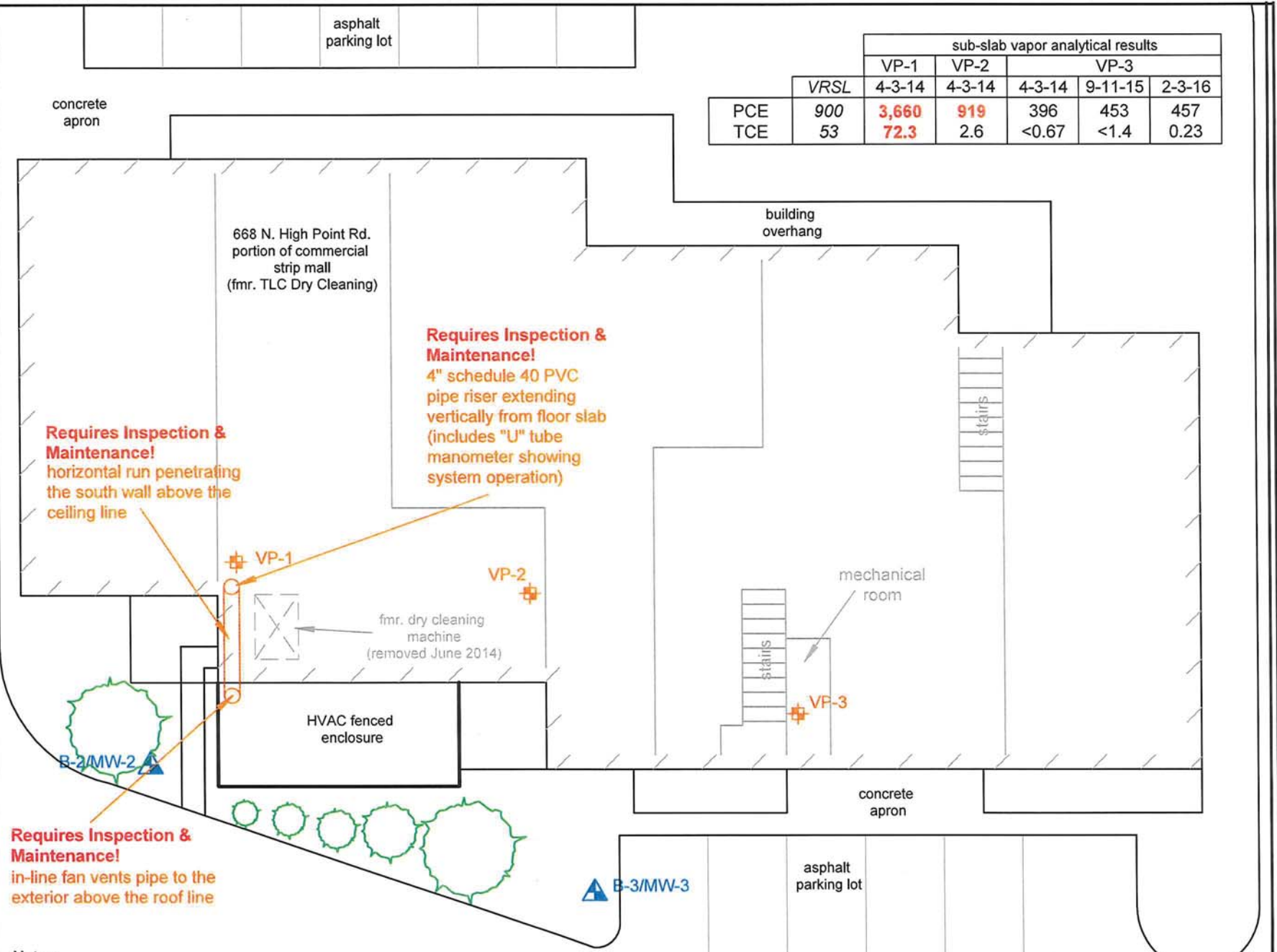
Drawing No.: 13-0702h

DWG Date: 2-4-15

Rev Date: 3-2-16

Drafted by: JEB

B.3.d Monitoring Wells
 Former TLC Cleaning Facility
 668 High Point Road
 Madison, Wisconsin

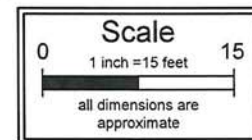


	VRSL	sub-slab vapor analytical results				
		VP-1	VP-2	VP-3		
		4-3-14	4-3-14	4-3-14	9-11-15	2-3-16
PCE	900	3,660	919	396	453	457
TCE	53	72.3	2.6	<0.67	<1.4	0.23

Notes:

- 1.) the vapor samples were installed and sampled with procedures in accordance with DNR Guidance Documents RR-800 and RR-986.
- 2.) concentrations in **red bold** exceed their VRSLs
- 3.) the VRSLs are for small commercial properties and were obtained from the DNR Quick Lookup Table. The VRSLs were determined from the EPA Vapor Action Levels (VALs) using a 0.03 attenuation factor.

⊕ = April 2014 ReadyEarth vapor point
PCE = tetrachloroethene
TCE = trichloroethene
VRSL = vapor risk screening level



Attachment C: Documentation of Remedial Action

C.1 Site investigation documentation – no attachment. All pertinent information to document the site investigation and remedial actions at the site were submitted with the previous closure request dated March 26, 2015.

C.2 Investigative Waste – no attachment. All pertinent information to document the site investigation and remedial actions at the site were submitted with the previous closure request dated March 26, 2015.

C.3 RCL Methodology – no attachment. ReadyEarth utilized the RCL Spreadsheet available at <http://dnr.wi.gov/topic/Brownfields/Professionals.html> for the groundwater and non-industrial direct contact pathways.

C.4 Construction Documentation – no attachment. All pertinent information to document the site investigation and remedial actions at the site were submitted with the previous closure request dated March 26, 2015.

C.5 Decommissioning of Remedial Systems – no attachment. There has been no decommissioning of remedial systems at the site.

C.6 Other – All pertinent information to document the site investigation and remedial actions at the site were submitted with the previous closure request dated March 26, 2015.

Attachment D: Maintenance Plan and Photographs

D.1 Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation, feature or other action for which maintenance is required

D.2 Location Maps

D.2.a Vapor Mitigation System Map

D.2.b Vapor Mitigation System Details Diagram

D.3 Photographs

D.4 Inspection Log (4400-305)

**VAPOR MITIGATION SYSTEM (VMS) MAINTENANCE PLAN
DNR BRRTS No. 02-13-552185**

March 2, 2016

System Description, Purpose, and Location:

668 N. High Point Road
Madison, WI 53717

Parcel Identification No.: 60-0708-232-1228-1

LOT 1, CERTIFIED SURVEY MAP 5514, RECORDED IN VOL. 25 OF CERTIFIED SURVEY MAPS, PAGE 126 #2074308, IN THE CITY OF MADISON, DANE COUNTY, WISCONSIN.

This document is a maintenance plan for a vapor mitigation system (VMS) at the above-referenced property (the "Property"). This maintenance plan is prepared in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code.

Select volatile organic compounds (VOCs) have been detected in vapors beneath the floor slab of the existing building at the Property. The source of the VOCs is a former dry cleaning business that operated at the Property. The dry cleaning operations at the Property ceased as of June 2014. The VOCs have been investigated and a closure request has been submitted to the Wisconsin Department of Natural Resources (DNR). As a component of closure, the DNR requires that a VMS be maintained at the Property. The locations of the VMS components are illustrated on the attached D.1.a and D.1.b as well as the attached photographs.

More site-specific information about the Property may be found in:

- The case file in the Wisconsin Department of Natural Resources (DNR) Fitchburg Service Center located at 3911 Fish Hatchery Road, Madison, WI 53711
- BRRTS on the Web (DNR's internet database of contaminated sites): <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>
- GIS Registry PDF file for further information on the nature and extent of contamination: <http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>

The VMS at the Property is designed to vent air from beneath the floor slab to the exterior of the building. The VMS consists of one drop point through the floor slab along the west wall in the southern portion of the 668 N. High Point Road space. The interior components of the VMS consist of one 4-inch PVC pipe that extends vertically from just below the floor slab up to approximately 10 feet that then runs horizontally (with appropriate pitch) through the south wall of the building. The vertical section of the interior pipe includes a "U" tube manometer to indicate system operation. The exterior components of the VMS include a vertical section of the pipe that runs through an in-line fan that exhausts above the roof line. The fan is hard wired through exterior and interior junction boxes to an internal power source.

System Design:

The piping throughout the VMS is 4-inch, schedule 40 PVC. The piping is sealed through the approximate 5- to 6-inch concrete flooring with a rubber gasket and caulking. The vertical section of the pipe from the floor slab includes a simple "U" tube manometer. One end of the manometer tube is open to the ambient air, the other end of the tube is sealed within the pipe, and the tube is filled with liquid (dyed red for easy visual evaluation). The differential in the liquid levels from one side of the tube to the other indicates the relative pressure differential within the pipe compared to the ambient atmosphere.

The in-line fan is an HP-220 Fantech fan. The fan was wired by a licensed electrician and is equipped with a weatherproof disconnect. The fan exhausts approximately 10 inches above the roof line.

System Maintenance:

The system must run continuously at the Property in order to be in compliance with this Maintenance Plan. There is no required maintenance per the manufacturer's specification sheet. In the event that the fan requires maintenance or becomes inoperational (either audibly or by visual inspection of the manometer), the fan should be inspected, repaired, or replaced by competent personnel and any replacements shall be at least equivalent to the equipment originally installed. Any repair or replacement activities shall be documented in the attached Inspection Log.

The VMS riser floor penetration and the flooring in the immediate vicinity of the riser penetration shall be maintained as to continue to provide as impermeable a flooring

surface as practical. Any repairs or other penetrations through the existing flooring must be conducted to provide as impermeable a flooring surface as practical. Any repair or replacement activities shall be documented in the attached Inspection Log.

If removal or other material changes to the VMS are considered, the Property owner shall contact DNR at least 45 days before taking such an action to determine whether further action may be necessary to protect human health, safety, or welfare, or the environment, in accordance with s. NR 727.07, Wis. Adm. Code. The system may only be removed upon written approval from the DNR. Additional sampling may be required to demonstrate that the VMS is no longer warranted for the Property.

Inspections:

The VMS is designed to easily verify system operation through visual inspection of the manometer. The level of red liquid in the side of the manometer tube that extends into the piping should be higher than the level of liquid in the end of the tube that is open to the air (see Photo 4). The operation of the fan can be checked by simply listening for the sound of the fan running.

All inspections shall be documented on the attached inspection log, and the inspection log shall be maintained at the Property along with this Maintenance Plan. The DNR closure letter will specify the frequency of the VMS inspections and whether the inspection log needs to be submitted to the DNR.

Notifications:

The Property use shall not be changed to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings, without written approval from the DNR. Further, changes to the construction of the building that would affect the operation of the current VMS shall not be made without written approval from the DNR.

If removal or other material changes to the VMS are considered, the Property owner shall contact DNR at least 45 days before taking such an action to determine whether further action may be necessary to protect human health, safety, or welfare, or the environment, in accordance with s. NR 727.07, Wis. Adm. Code. The system may only be removed upon written approval from the DNR.

Contacts Information (as of April 2015):

Site Owner Contact:

Flad Development & Investment Corp.
Attn: Mr. Tom Romano
Oakbridge Commons
7941 Tree Lane, Suite 105
Madison, WI 53717-2029
(608) 833-8100
tromano@flad-development.com

Signature: _____

Consultant:

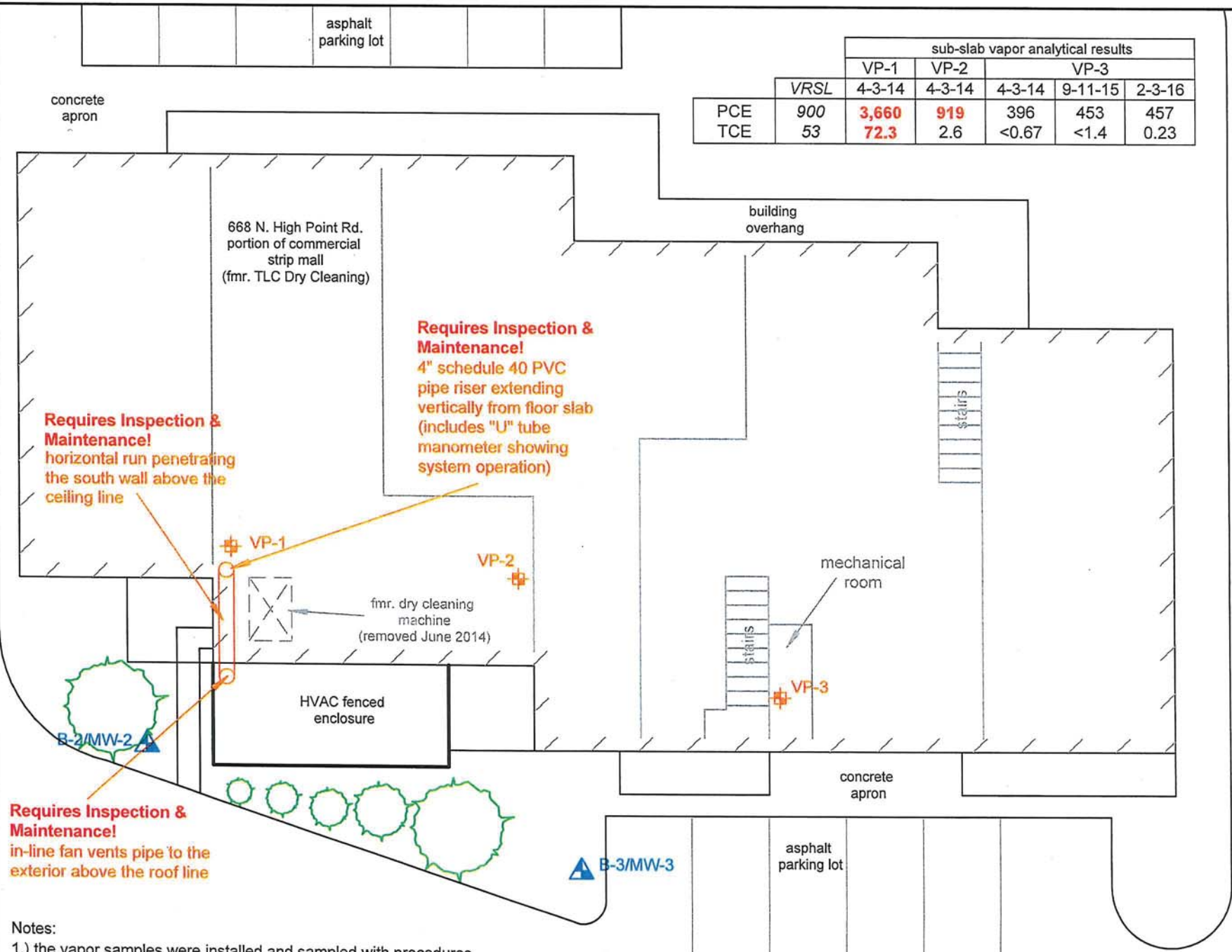
ReadyEarth Consulting, Inc.
Attn: Jason Bartley
P.O. Box 365
Pewaukee, WI 53072
(262) 522-3520
jbartley@readyearth.net

VMS Installation Contractor

Zander Solutions
Attn: Corey Benson
3316 Meadow Road
Verona, WI 53593
(608) 821-4378
cbenson@zandersolutions.com

DNR Project Manager:

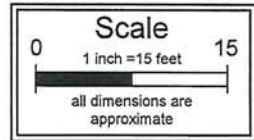
Mr. Michael Schmoller
3911 Fish Hatchery Road
Madison, WI 53711
(608) 275-3303
michael.schmoller@wisconsin.gov



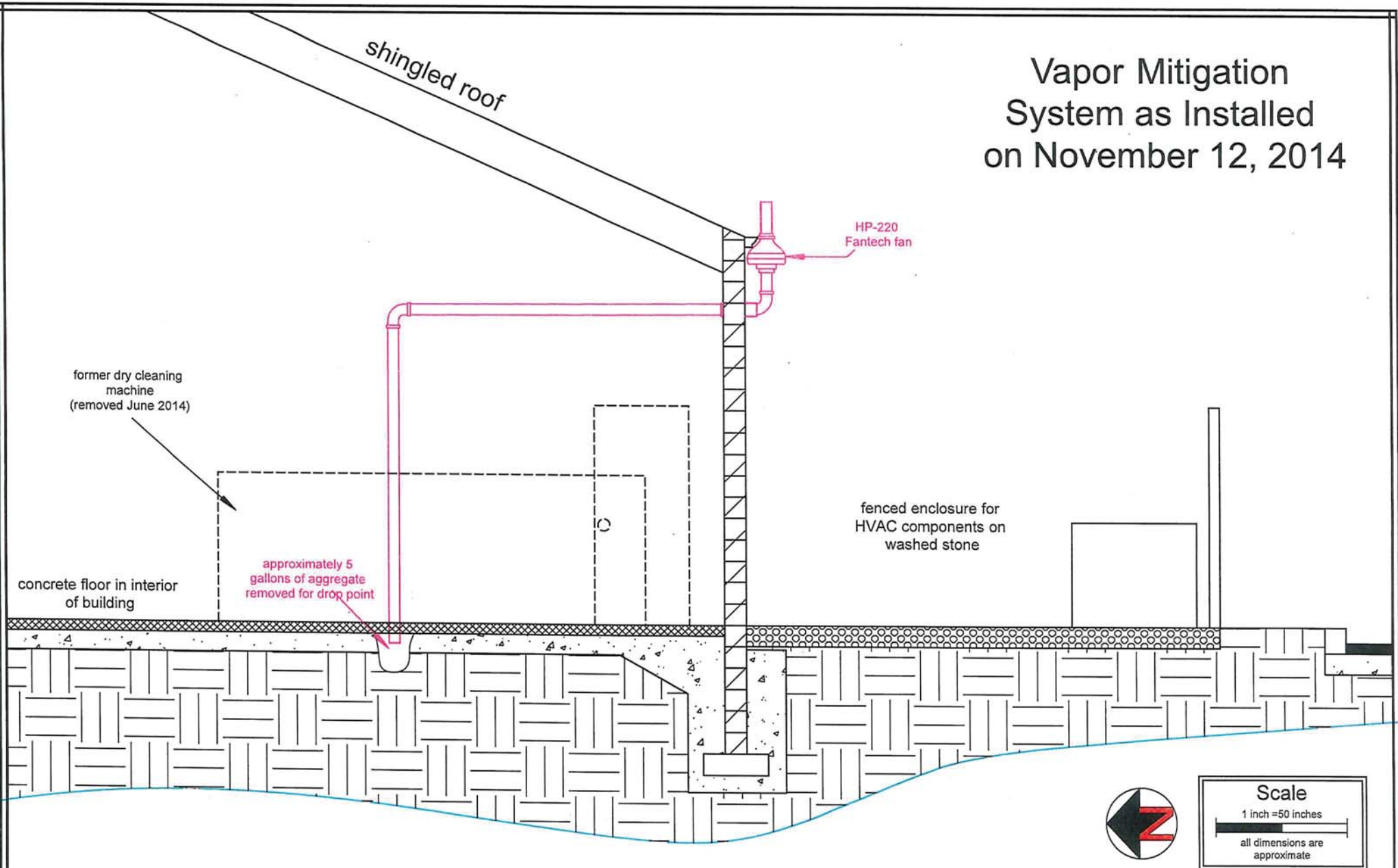
	VRSL	sub-slab vapor analytical results				
		VP-1 4-3-14	VP-2 4-3-14	VP-3		
		4-3-14	9-11-15	2-3-16		
PCE	900	3,660	919	396	453	457
TCE	53	72.3	2.6	<0.67	<1.4	0.23

- Notes:
- 1.) the vapor samples were installed and sampled with procedures in accordance with DNR Guidance Documents RR-800 and RR-986.
 - 2.) concentrations in **red bold** exceed their VRSLs
 - 3.) the VRSLs are for small commercial properties and were obtained from the DNR Quick Lookup Table. The VRSLs were determined from the EPA Vapor Action Levels (VALs) using a 0.03 attenuation factor.

= April 2014 ReadyEarth vapor point
 PCE = tetrachloroethene
 TCE = trichloroethene
 VRSL = vapor risk screening level



Vapor Mitigation System as Installed on November 12, 2014



Drawing No.: 13-0702k
 DWG Date: 3-25-15
 Rev Date: 3-2-16
 Drafted by: JEB

D.2.b Vapor Mitigation System Details Diagram
 Former TLC Cleaning Facility
 668 N. High Point Road
 Madison, Wisconsin

D.3 Photographs

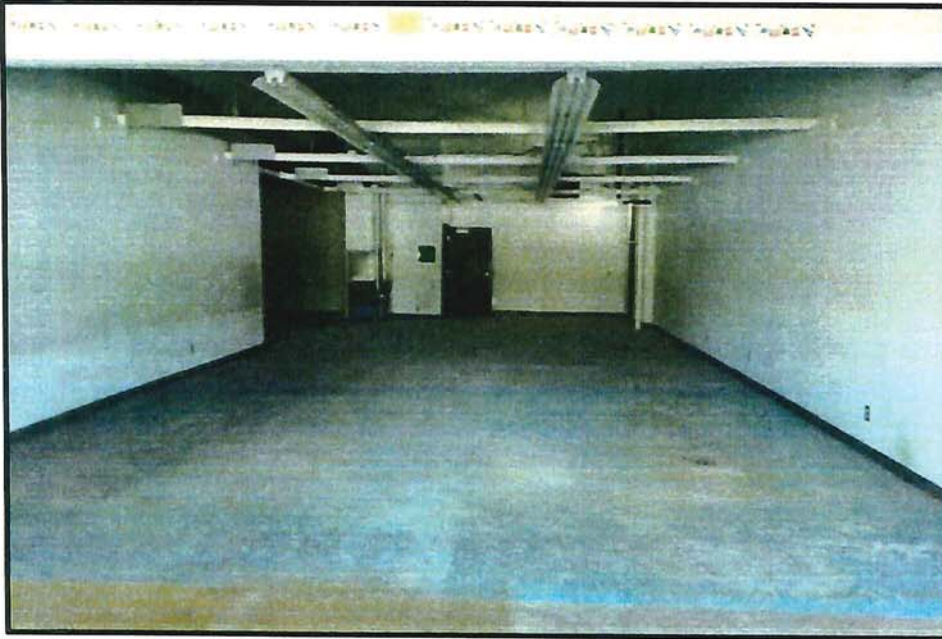


Photo 1 – Looking south at the interior of the former dry cleaning space. The dry cleaning business is no longer operational at the site. The dry cleaning machine formerly sat in the center background of the space shown in this photo.

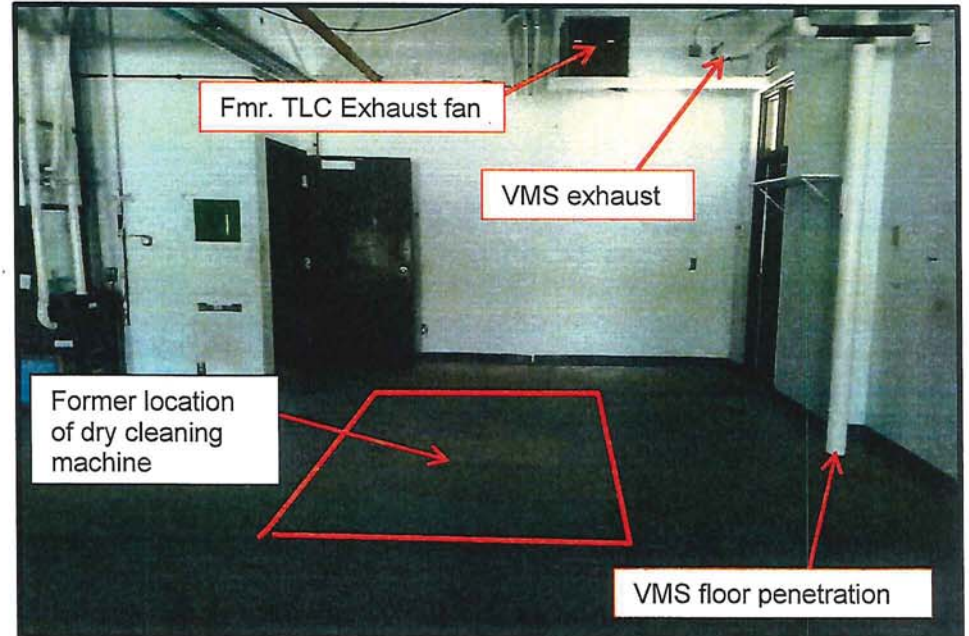


Photo 2 – This photograph was taken from a close up vantage compared to Photo 1 and shows the former location of the dry cleaning machine and the location of the VMS installed in November 2014.

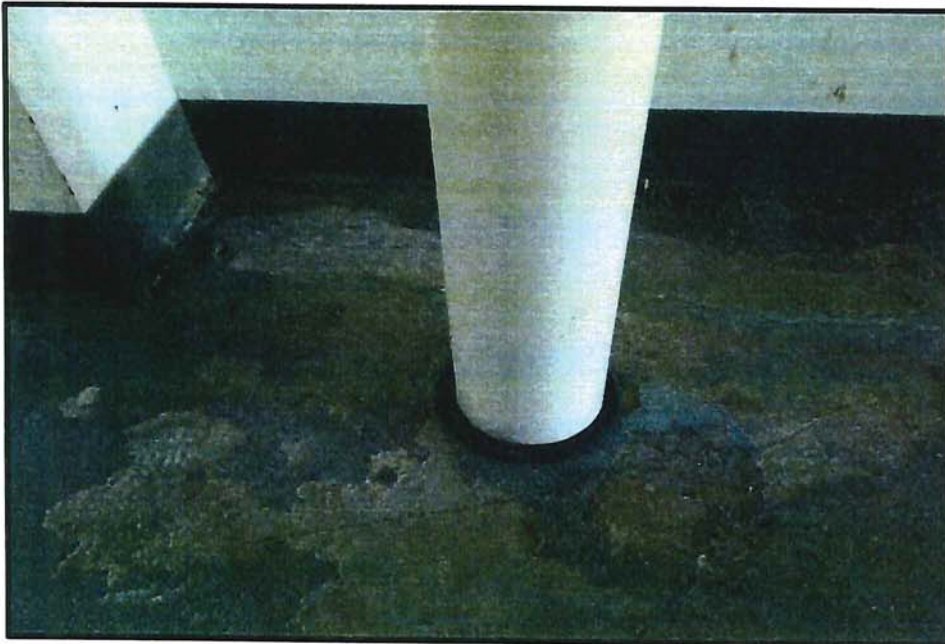


Photo 3 – This photograph shows a close up of the floor penetration of the VMS. The floor penetration was sealed with a rubber gasket and caulk. The concrete is approximately 5 to 6 inches thick and approximately 5 inches of sub-slab concrete was removed.

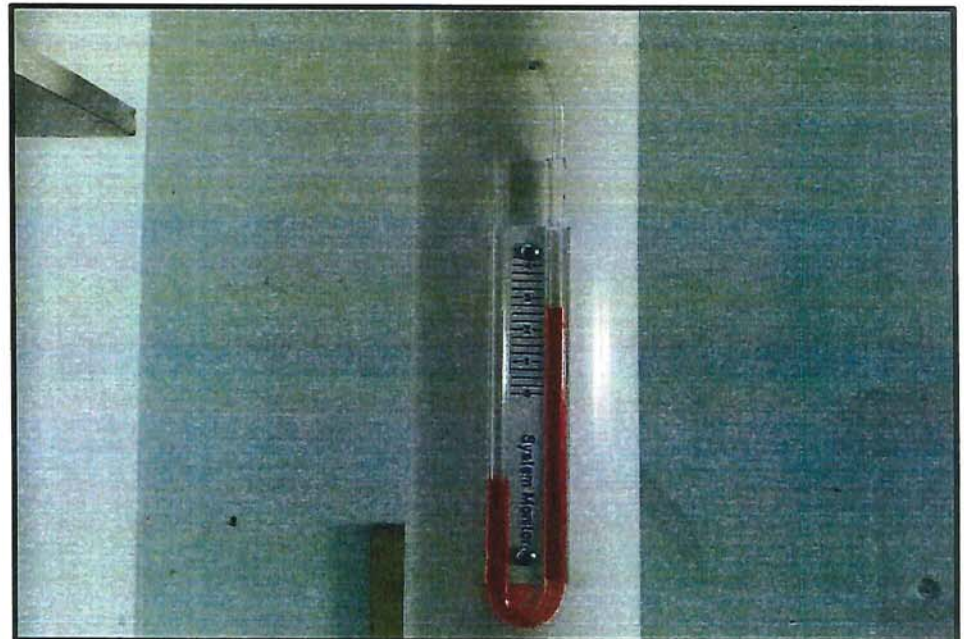


Photo 4 – This photograph shows a close up of the manometer showing that the system is operational.

D.3 Photographs



Photo 5 – This photograph shows the upper PVC piping of the VMS and the exit point through the wall. This photograph also shows that the exterior fan is hardwired to the internal power source.



Photo 6 – This photograph shows a close up of the exit point and the interior electrical junction box.

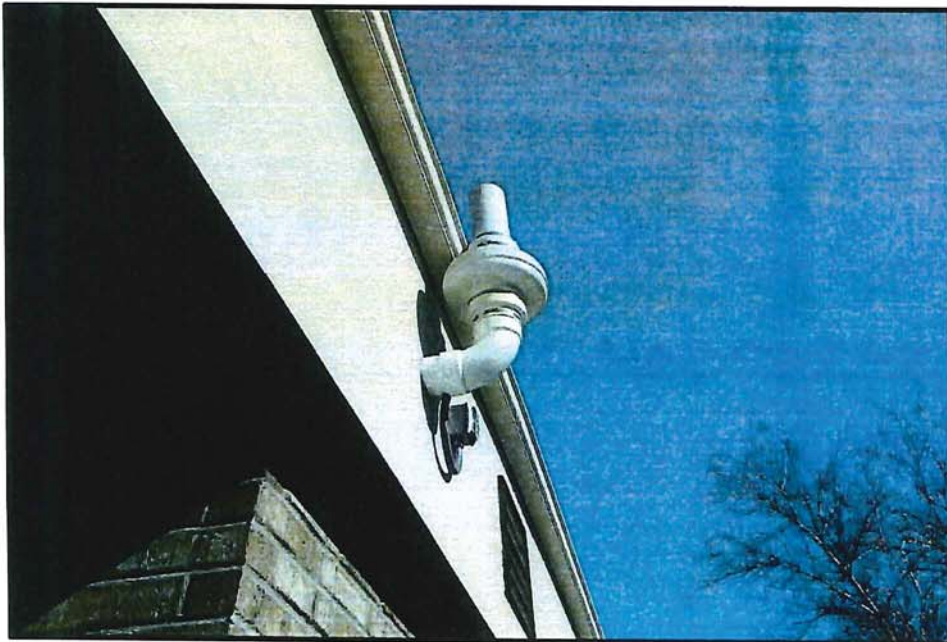


Photo 7 – This photograph looks northeast and up at the exterior fan

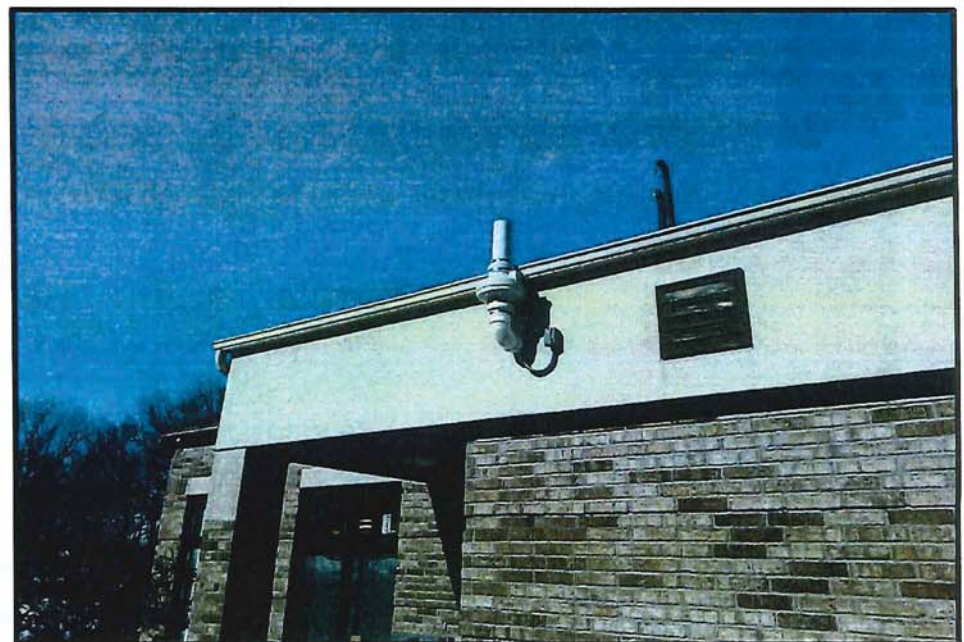


Photo 8 – This photograph looks at the same fan shown in Photo 7 and how the exhaust point terminates above the roof line.

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Former TLC Cleaning Facility	BRRTS No. 02-13-552185
---	----------------------------------

Inspections are required to be conducted (see closure approval letter):

annually
 semi-annually
 other – specify _____

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input checked="" type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

Attachment E: Monitoring Well Information

No attachment – All monitoring wells were abandoned on November 11, 2015. ReadyEarth submitted the well abandonment documentation to the DNR in a letter dated January 29, 2016.

Attachment F: Source Legal Documents

F.1 Deed

F.2 Certified Survey Map

F.3 Verification of zoning

F.4 Signed statement

QUIT CLAIM DEED

DOCUMENT NO.

DANE COUNTY REGISTER OF DEEDS

Doc No 2933548

1998-02-13 08:44 AM
Trans. Fee 2220.00
Rec. Fee 10.00
Pages 1

University Limited Partnership, a Wisconsin limited partnership

quit claims to Sauk Creek LLC, a Wisconsin limited liability company

the following described real estate in Dane County, State of Wisconsin:

Lot 1, Certified Survey Map 5514, recorded in Vol. 25 of Certified Survey Maps, page 126, #2074308, in the City of Madison, Dane County, Wisconsin.

000059

THIS SPACE RESERVED FOR RECORDING DATA

NAME AND RETURN ADDRESS
Flad Development & Investment Corp.
Attn: John J. Flad, President
7842 Mineral Point Road, Suite 105
Madison, WI 53717

60-0708-232-1228-1
PARCEL IDENTIFICATION NUMBER

This is not homestead property.
(is) (is not)

Dated this 4th day of FEBRUARY 1998.

UNIVERSITY LIMITED PARTNERSHIP
By Flad Development & Investment Corp., General Partner

By [Signature] (SEAL) _____ (SEAL)

* John J. Flad, President

(SEAL) _____ (SEAL)

AUTHENTICATION

Signature of John J. Flad _____

authenticated this _____ day of _____, 1998

TITLE: ~~MEMBER STATE BAR OF WISCONSIN~~
(If not, Notary Public, State of Wisconsin
authorized by §706.06, Wis. Stats.)

THIS INSTRUMENT WAS DRAFTED BY
Thomas J. Sobota

(Signatures may be authenticated or acknowledged, Both are not necessary.)

ACKNOWLEDGMENT

STATE OF WISCONSIN

Dane County, } ss.

Personally came before me this 4th day of February, 1998, the above named John J. Flad

to me known to be the person _____ who executed the foregoing instrument and acknowledge the same.

* Marilyn L. Biever
Notary Public, Dane County, Wisconsin
My commission is permanent. (If not, state expiration date: May 13, 2001)

*Type or print name below signature.

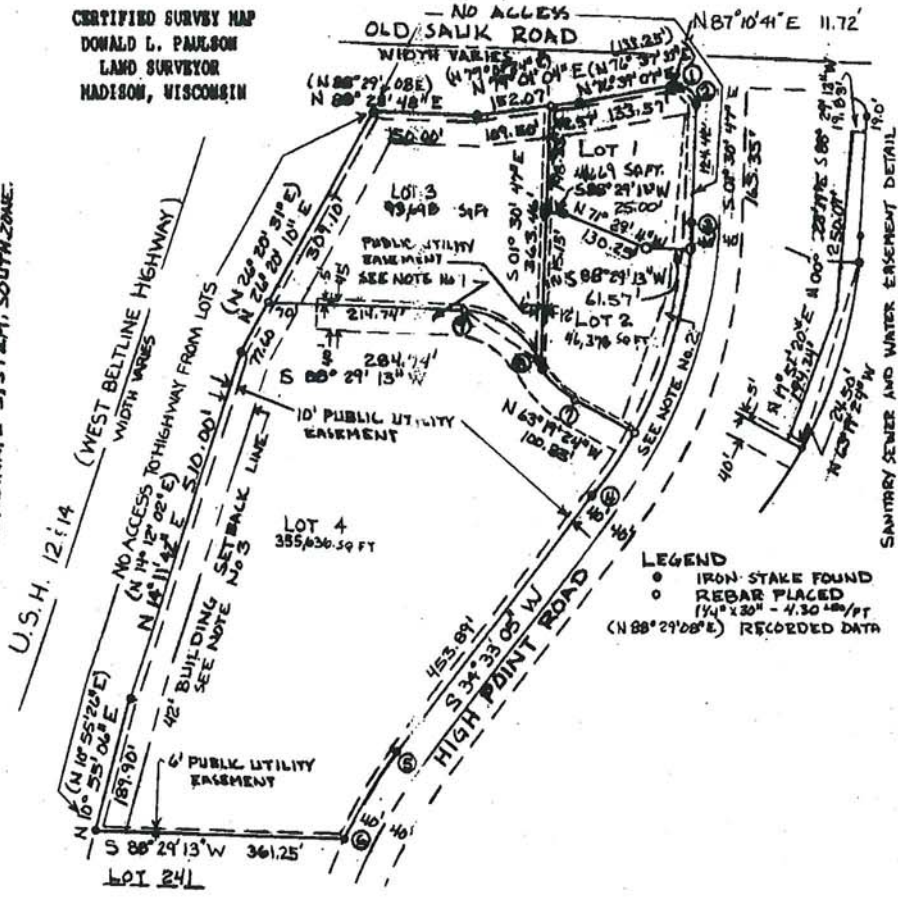
1/10

F.2 Certified Survey Map (Pg 1 of 2)

VOL 2000 PAGE 122

CERTIFIED SURVEY MAP
DONALD L. PAULSON
LAND SURVEYOR
MADISON, WISCONSIN

SCALE 1"=200'
ALL BEARINGS ARE REFERENCED
TO GRID NORTH OF THE WISCONSIN
COORDINATE SYSTEM, SOUTH ZONE.



LEGEND
● IRON STAKE FOUND
○ REBAR PLACED
(1/4" x 30" - 4.30 LBS/FT
(N 88° 29' 08" E) RECORDED DATA

NOTES:

1. 45' Wide Public Sanitary Sewer, Water Main and joint Driveway Easement for the benefit of Lots 2,3 and 4.
2. Public Sanitary Sewer and Water Main Easement.
3. The 42 foot setback strip is reserved for utilities, trees, signs, parking, and similar noise abatement facilities. The building of buildings hereon is prohibited. Maintenance of this strip and facilities thereon is the responsibility of the owner.



I HEREBY CERTIFY THAT I HAVE SURVEYED THE PROPERTY DESCRIBED HEREON ACCORDING TO THE DESCRIPTION FURNISHED AND THAT THE ABOVE MAP IS A CORRECT REPRESENTATION OF THE LOT LINES THEREOF AND I HAVE COMPLIED WITH SECTION 236.34 OF THE STATUTES OF THE STATE OF WISCONSIN.

Madison, Wisconsin Donald L. Paulson
Donald L. Paulson
Land Surveyor # 8-728

A and J Development Corp.
4513 Vernon Blvd.
Madison, Wisconsin 53705

ARNOLD AND O'SHERIDAN, INC.
815 FORWARD DRIVE
MADISON, WISCONSIN 53711

January 11, 1988

87456-C-1

CERTIFIED SURVEY MAP 5514

DOCUMENT NO. 2074208

Sheet 1 of 3 8.0

CERTIFIED SURVEY MAP
DONALD L. PAULSON
LAND SURVEYOR
MADISON, WISCONSIN

DESCRIPTION:

Lots 242 and 243, First Addition To Sauk Creek, located in the NW 1/4 of the NW 1/4 of Section 23, T7N, R8E, (Town of Middleton) in the City of Madison, Dane County, Wisconsin to-wit

Beginning at the southeast corner of said Lot 242; thence S88°29'13"W, 361.25 feet; thence N10°55'06"E, 189.90 feet; thence N14°11'42"E, 510.00 feet; thence N28°20'10"E, 386.70 feet; thence N88°28'48"E, 150.00 feet; thence N79°01'04"E, 152.07 feet; thence N76°39'07"E, 133.57 feet; thence N87°10'41"E, 11.72 feet to a point of curve; thence southeasterly on a curve to the right which has a radius of 25.00 feet and a chord which bears S47°10'03"E, 35.76 feet; thence S01°30'47"E, 165.35 feet to a point of curve; thence southwesterly along a curve to the right which has a radius of 660.00 feet and a chord which bears S16°31'09"W, 408.61 feet; thence S34°33'05"W, 453.89 feet to a point of curve; thence southwesterly on a curve to the left which has a radius of 700.00 feet and a chord which bears S28°36'56"W, 144.78 feet to the point of beginning.

This parcel contains 536,381.71 sq. ft. - 12.314 acres.

"Approved by the Secretary of the Plan Commission of the City of Madison, Dane County, Wisconsin, this 6 day of April, 1988.

George Austin by Alan J. Martin
George Austin

"Received for recording this 11th day of April, 1988, at 10:40 o'clock A.M. and recorded in Volume 25 of Certified Surveys, Pages 126, 127 & 128.

Carol R. Mahnke
Carol R. Mahnke, Register of Deeds
by: Dorene M. Duckert, Deputy

CURVE TABLE							
CURVE	LOT	RADIUS	CHORD	CHORD BEARING	I-ANGLE	TAN BEARING	ARC
1-2		25.00'	35.76'	S47°10'03"E	91°18'32"	N87°10'41"E S01°30'47"E	39.84'
3-4		660.00'	408.61'	S16°31'09"W	36°03'52"	S01°30'47"E S34°33'05"W	415.43'
	1	660.00'	37.27'	S00°06'18"W	03°14'10"		37.27'
	2	660.00'	270.52'	S13°32'55"W	23°39'06"		272.45'
	4	660.00'	105.60'	S29°57'47"W	09°10'36"		105.71'
5-6		700.00'	144.78'	S28°36'56.5"W	11°52'17"	S34°33'05"W S22°40'48"W	145.04'
7-8		150.00'	78.00'	N48°15'12.5"W	30°08'23"	N63°19'24"W N33°11'01"W	78.90'
	2	150.00'	65.83'	N50°38'54.5"W	25°20'59"		66.37'
	3	150.00'	12.54'	N35°34'42"W	04°47'24"		12.54'
8-9		130.00'	126.70'	N62°20'54.5"W	58°19'47"	N33°11'01"W S88°29'13"W	132.35'

A and J Development Corp.
4513 Vernon Blvd.
Madison, Wisconsin 53705

January 11, 1988

87456-C-2

ARNOLD AND O'SHERIDAN, INC.
815 FORWARD DRIVE
MADISON, WISCONSIN 53711

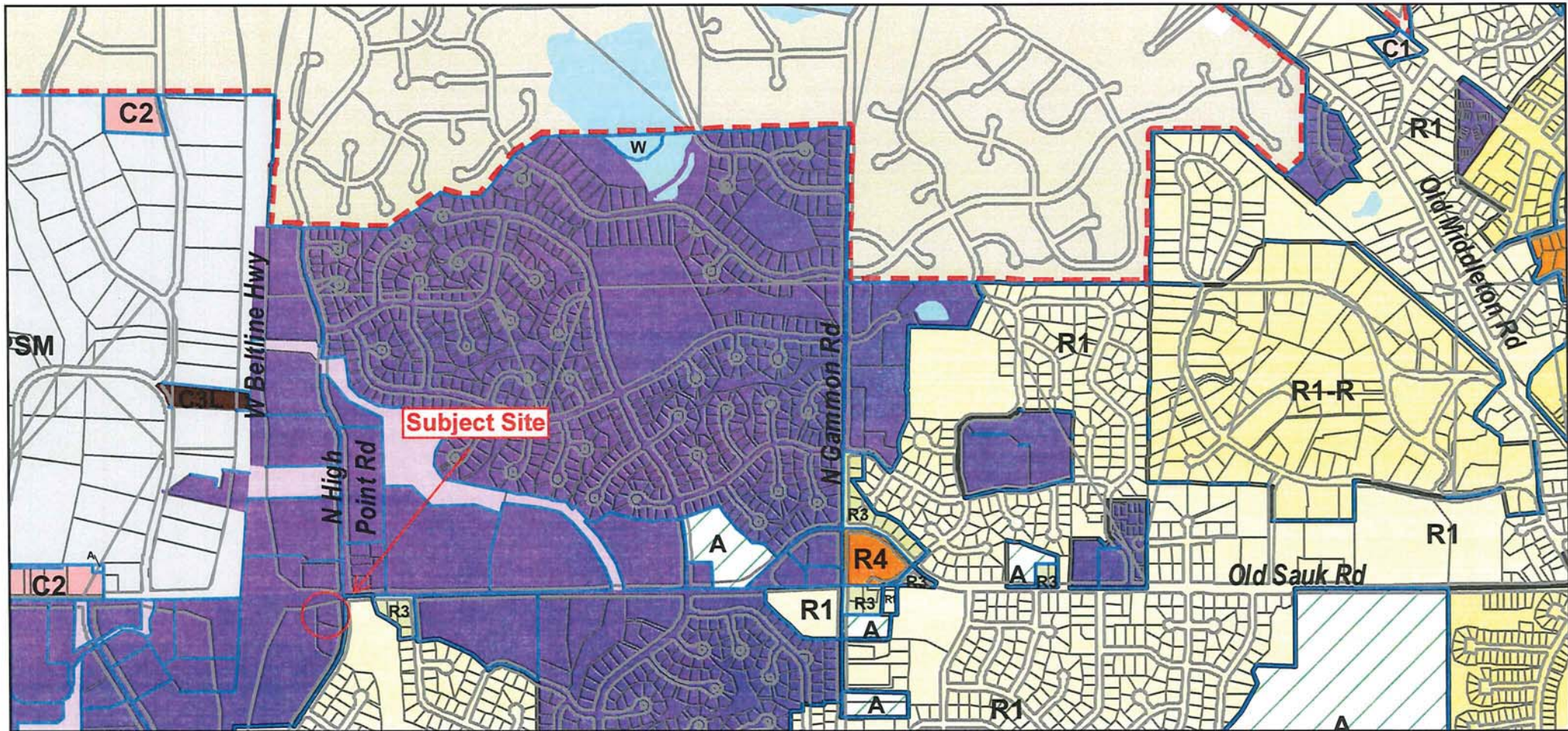
CERTIFIED SURVEY MAP

5514

DOCUMENT NO. 2074308

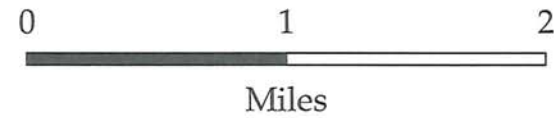
Sheet 2 of 3

F.3 Verification of Zoning (Pg 1 of 2)



City of Madison Zoning Districts

July 2011



City of Madison Zoning Districts

- | | | |
|--|--|--|
| R1 - Single-Family Residence District | OR - Office Residence District | C1 - Limited Commercial District |
| R1-R - Rustic Residence District | PCDGDP - Planned Community Development - General Development Plan | C2 - General Commercial District |
| R2 - Single-Family Residence District | PCDMHPGDP - Planned Community Mobile Home Park District - General Development Plan | C3 - Highway Commercial District |
| R2S - Single-Family Residence District | PUDGDP - Planned Unit Development - General Development Plan | C3L - Commercial Service and Distribution District |
| R2T - Single-Family Residence District | PUDSIP - Planned Unit Development - Specific Implementation Plan | C4 - Central Commercial District |
| R2Y - Single-Family Residence District | PCDMHPSIP - Planned Community Mobile Home Park District - Specific Implementation Plan | RPSM Research Park - Specialized Manufacturing District |
| R2Z - Single-Family Residence District | PCDSIP - Planned Community Development - Specific Implementation Plan | RDC - Research & Development Center District Specialized Research & Manufacturing District |
| R3 - Single- and Two-Family Residence District | O-1 - Limited Office-Residence District | M1 - Limited Manufacturing District |
| R4 - General Residence District | O-2 - Business & Professional Office District | SM - Specific Manufacturing District |
| R4A - Limited General Residence District | O-3 - Administrative Office District | M2 - General Manufacturing District |
| R4L - Limited General Residence District | O-4 - Administrative Office & Research & Development District | A - Agriculture District |
| R5 - General Residence District | | C - Conservancy District |

zoning for site is "Planned Development"

F.4 Signed Statement

March 25, 2015

RE: GIS Statement Regarding the Former TLC Dry Cleaning, Inc. Site Located at 668 N. High Point Road in Madison, Wisconsin; ReadyEarth Project No. 13-0702; DNR BRRTS Nos. 02-13-552185

To Whom It May Concern,

I believe that the legal description on the attached "Quit Claim Deed" recorded at the Dane County Register of Deeds accurately describes the correct contaminated property.

Sincerely,

A handwritten signature in black ink that reads "Tom Romano". The signature is written in a cursive style with a large, looping initial "T".

Mr. Tom Romano
Agent

Attachment G: Notification to Owners of Affected Properties

There are no attachments for this section because there are no other affected owners.