From: Schultz, Josie M - DNR

Sent: Thursday, May 16, 2024 4:57 PM ken.Ebbott@sandcountyenv.com

Cc: Roger Dulmes; IMOGENE'S CLEANING CTR

Subject: SIWP notice to proceed with comments - Imogenes, BRRTS # 02-60-552193

Hi Ken,

Thank you for the conversation this afternoon to discuss the workplan for Imogenes Cleaning Center. DNR is providing the notice to proceed with the work with the following comments and/or recommendations:

- Sheboygan Paper Box Company Building
 - O DNR has concerns with the employees of the Sheboygan Paper Box Company taking breaks beneath the vent for the active drycleaning machine at Imogenes, and has consulted with the Wisconsin Department of Health Services (DHS). DHS will be reaching out to the Sheboygan County's Environmental Health office to provide health-based education to the employees regarding the PCE vapors.
 - DNR is requesting that the indoor air sampling be completed as proposed with the following comments and/or recommendations:
 - Since there is an elevator in the basement of Sheboygan Paper Box building, DNR recommends that a passive sampler also be placed within the elevator shaft.
 - DNR recommends that a 24-hour summa canister sample also be obtained while the dry cleaner isn't operating to compare to the passive sampler results for if VI is coming from the active exhaust.
 - DNR requests that the fire doors (i.e. interior doors) within the stairwell remain closed to prevent possible re-entrainment from the active drycleaner's vent.
 - DNR understands that funding is limited, and that sub-slab sampling will not be completed during this round of sampling at the building, however, wants to reiterate that delineation will be required for the exceedances at VP-A to ensure the VMS is capturing all vapor exceedances beneath the slab of the building.
- Merry Maids Building
 - DNR agrees with the sampling plan for the Merry Maids building with the following comments:
 - The vapor ports should not be abandoned after the first round of sampling; the building will need at least two to three rounds of vapor sampling completed, with at least one round completed during the heating season, i.e. winter.
- Sanitary Sewer
 - DNR agrees with the sampling plan and manhole sampling locations for the sanitary sewer, and has the following comments/recommendations:
 - Because the sanitary sewer is made of brick and is below the water table, DNR has concerns with contaminated groundwater filtering into the sanitary sewer. DNR requests that a water sample be obtained from manholes SA-30-001 and SA-20-014.
 - DNR requests that the sanitary lateral and main backfill be investigated as a preferential pathway for contamination to travel. DNR recommends that this be completed by vapor sampling via a soil gas probe within the bedding of the sanitary later, and another probe along the sanitary main in Saemann Ave.

Please feel free to call or email me if you have any questions or concerns. DNR appreciates the additional investigation at this site.

Thank you, Josie

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Josie M. Schultz

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