From: Schultz, Josie M - DNR

Sent: Wednesday, June 5, 2024 3:44 PM

To: Ken Ebbott

Cc: Roger Dulmes; IMOGENE'S CLEANING CTR

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

552193

Good Afternoon Ken,

I've reviewed your questions with our vapor expert, and we have the following comments/recommendations:

- 1. DNR requests that the 24-hour summa canister sample be paired/placed with the outdoor passive sampler that is placed outside of the drycleaning vent. This sampler should collect the sample over a 24-hour period when the DCM isn't operating.
- 2. DNR would prefer your proposed shallower passive soil gas samplers that are installed manually, and to include additional locations:
 - a. Add a location along the lateral, closer to the building.
 - b. Add a location further to the south along the sanitary sewer, into the residential neighborhood.

Please let me know if you have any questions, or feel free to call me if you would like to discuss.

Thank you, Josie

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Josie Schultz

Cell Phone: (920) 366-5685 Josie.Schultz@Wisconsin.gov

From: Ken Ebbott <ken.ebbott@sandcountyenv.com>

Sent: Friday, May 31, 2024 10:01 AM

To: Schultz, Josie M - DNR < josie.schultz@wisconsin.gov>

Cc: Roger Dulmes <ROGER3033@charter.net>; IMOGENE'S CLEANING CTR <imogenescc@yahoo.com>;

Ken Ebbott < ken.ebbott@sandcountyenv.com >

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

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Josie,

I am working up the revised scope so I can adjust the cost estimate for Roger.

I've gotten the OK to access the manholes from the City, so we are making progress. A couple follow up questions on methods / scope:

- 1) I just want to verify a few things on the indoor air sampling within the Box company basement:
 - We will obtain four samples for lab analysis using the Waterloo Membrane 10-day sample method.

 - The sample locations and heights will be the breathing height (4 to 5' above floor) at three locations Stairwell basement level space; near VP-G; and in the elevator shaft.
 - We will also obtain one Waterloo Membrane 10-day sample of the outside ambient air above the rear door

We will keep the door closed for the 10 day test period (if possible)

- There will also be one 24-hour summa canister sample obtained I assume from the same location as the 10-day sampler at VP-G
- 2) Questions about the Soil Gas Probe samples in the sanitary lateral and fill of the sanitary in Saemann.

I would prefer to delay this work until we get the other testing completed, if possible, and we can go over methods and locations later. The questions I have about it are:

Locations?

- I would plan one sample in the grass at the lateral just south of the sidewalk. On Figure 1 (Attached) that would be where the arrow with the caption "Sanitary and Water lateral to building installed in 1962" terminates.
- The other sample I assume you want east (downgradient) of the lateral connect and the manhole in Saemann? That would be at the approximate pedestrian crosswalk on Figure 1? Please advise.

Method of sample collection for soil gas?

What is preferred for this situation? I assume Geoprobe borings with installation of a 6-inch stainless steel screens / tubing to grade, sealed with bentonite. Then purge the line slowly, and obtain a 6-liter summa canister sample as a 30 minute grab.

I would go with a depth of about 4 to 5 feet at the lateral as there is a water line buried there too, and we don't want to hit any pipes. At the main in Saemann, we can drill deeper, perhaps 7 to 8 feet.

The other method I've done is to implant a passive charcoal sampler in the soil only a few feet down, and then remove it about 10 days later. I assume you prefer the Summa Can method, but if the passive method is acceptable, I could likely install those manually to depths of 2 to 3 feet. Less risk of hitting or breaking a line with this approach, but refusal at a shallow depth is a possibility.

Let me know your thoughts.

Ken

Regards,

Ken Ebbott, PG, CGWP

Senior Project Manager/Senior Geologist

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From: Schultz, Josie M - DNR < josie.schultz@wisconsin.gov>

Sent: Thursday, May 16, 2024 4:57 PM

To: Ken Ebbott <ken.ebbott@sandcountyenv.com>

Cc: Roger Dulmes < ROGER3033@charter.net>; IMOGENE'S CLEANING CTR < imogenescc@yahoo.com>

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
 - ONR 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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Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Josie M. Schultz

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