State of Wisconsin DEPARTMENT OF NATURAL RESOURCES Waukesha Service Center 141 NW Barstow St. Waukesha WI 53188

Tony Evers, Governor Preston D. Cole, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



August 11, 2022

BMP Realty, Inc Attn: Mr. Jason Berry 3319 Nobb Hill Drive Mount Pleasant, WI 53406

> Subject: Review of Site Investigation Work Plan for One Hour Martinizing, 301 Main St., Racine, WI BRRTS: 02-52-552198, FID: 252010990

Dear Mr. Berry:

The Department has reviewed the Site Investigation Work Plan submitted by Giles Engineering Associates, Inc for the One Hour Martinizing site at 301 Main St., Racine. The following comments and concerns will need to be addressed in order for the Department to complete the review.

- 1. Are there any remaining dry-cleaning chemicals stored onsite?
- 2. Is the dry-cleaning machine still in the building and if so, does it have any residual chemicals?
- 3. Was the dry-cleaning machine below grade or did it sit on the floor?
- 4. Provide a figure showing locations of all floor drains and/or cracks in the floor near the drycleaning machine that would be potential migration pathways.

Vapor:

- 1. A sub-slab vapor sample should be located in the middle of unit 303.
- 2. Indoor air samples should be collected in units 301, 303, 303.5 and 305.
- 3. Explain the selected locations of proposed vapor samples, and compare to locations of floor drains, bathrooms, utilities under the building, etc.
- 4. Regarding the proposed vapor mitigation system, Wisconsin Administrative Code NR 726.05(8)(b)1. Requires a remedial action be conducted to reduce the mass and concentration of volatile compounds to the extent practicable and NR 726.05(8)(b)2. Requires the vapor exposure pathway be interrupted or mitigated. Propose a remedial action that is appropriate for this site that is more than installing a vapor mitigation system as those are not considered remedial actions.

Soil:

- 1. Provide a figure showing the location of all utilities that enter all the units in the building from under the floor as well as in the street and/or alley.
- 2. Provide figures that include the location of the utilities, previous soil and groundwater sampling locations with the data, as well as the location of proposed soil and groundwater sampling points.



- 3. Review the placement of the proposed soil and groundwater as well as vapor sampling points in relation to utility locations and revise placements as necessary to assess whether utilities are migration pathways.
- 4. Include all soil boring logs for the borings installed to date and any reports prepared by other consultants for this site.
- 5. The report states no basement is beneath the building. Is there a crawl space or storage in the area beneath the stairs to the alley? A cross section would be helpful in explaining the building construction related to the surrounding ground surface.

Groundwater:

1. If possible, move the proposed monitoring well on the west side of the building to the south to be more in line with unit 303.

Emerging Contaminants:

Provide a PFAS/Emerging Contaminant Scoping Statement in the next submittal.

At this time the Department is unable to approve the Site Investigation Work plan as submitted. A new work plan including the requested information should be submitted. A discussion of an active remedy to address the soil contamination should also be included in the new document.

Please contact me with any questions at <u>shanna.laubeanderson@wisconsin.gov</u>.

Sincerely,

Shanned Leube andron

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

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

Page 3