



# GILES

ENGINEERING ASSOCIATES, INC.

GEOTECHNICAL, ENVIRONMENTAL & CONSTRUCTION MATERIALS CONSULTANTS

• Dallas, TX  
• Los Angeles, CA  
• Manassas, VA  
• Milwaukee, WI

January 10, 2024

Wisconsin Department of Natural Resources  
Remediation and Redevelopment Program  
Southeast Region Office  
1027 W. St. Paul Avenue  
Milwaukee, WI 53233

Attention: Ms. Shanna Laube-Anderson c/o  
Ms. Jennifer Meyer

Subject: Response to WDNR Correspondence dated August 11, 2022  
One Hour Martinizing (Former)  
301 Main St., Racine, Wisconsin 53403  
BRRTS No. 02-52-552198 / FID No. 252010990  
Project No. 1E-2109011

Dear Ms. Laube-Anderson:

Giles Engineering Associates, Inc. (Giles) has prepared the following response to the Wisconsin Department of Natural Resources (WDNR) comments and concerns presented in their correspondence dated August 11, 2022. The WDNR has requested that the following comments and concerns be addressed including:

**1. Are there any remaining dry-cleaning chemicals stored onsite?**

No.

**2. Is the dry-cleaning machine still in the building and if so, does it have any residual chemicals?**

No for both.

**3. Was the dry cleaning machine below grade or did it sit on the floor?**

On the floor slab and was not below grade.

**4. Provide a figure showing locations of all floor drains and or cracks in the floor near the dry-cleaning machine that would be potential migration pathways.**

Mr. Jason Berry the Responsible Party (RP) presented Giles a map of subsurface utility's including photo documentation of floor drains and cracks in the floor, and photo documentation of the exterior. Units 305 Main St. is occupied by Creative Flex Studio and unit 307 is occupied by Rise Up Piercings and Tattoo with the remaining units vacant (301, 303 and 303.5). The maps and photos from the RP are presented as Attachment 1.

**Vapor:**

**1. A sub-slab vapor sample should be located in the middle of unit 303.**

Giles will install an additional sub-slab vapor point to the middle of unit 303. See the Revised Site Investigation Work Plan (Revised SIWP) Figure 6.

**2. Indoor air samples should be collected in units 301, 303, 303.5 and 305.**

Giles will perform indoor air sampling in units 301, 303, 303.5 and 305 (ideally Giles will perform these within the central portion of the units, if possible). Indoor air samples would be collected over a 10-day sampling period using the Radiello (RAD-130) sampler. The chemicals of concern that will be analyzed for this project included CVOCs includes a short list of the following parameters: Tetrachloroethene (PCE), Trichloroethene (TCE), Cis-1,2-Dichloroethene (cis-1,2-DCE), Trans-1,2-Dichloroethene (trans-1,2-DCE), 1,1-Dichloroethene (1,1-DCE), and 1,2-Dichloroethane (1,2-DCA). Vinyl Chloride (VC) cannot be tested using this method. See the Revised SIWP Figure 6.

**3. Explain the selected locations of proposed vapor samples, and compare to locations of floor drains, bathrooms, utilities under the building, etc.**

Giles is proposing to install permanent vapor pin at the locations VP-1 (source area) and VP-2 (further west) which were removed and abandoned with concrete back in 2021 within unit 301. Also, within unit 301 a third vapor pin will be installed within the receiving area in the western portion of the unit. These vapor pins will also be installed to be used as pressure field extension (PFE) measurements when a sub-slab vapor mitigation system is installed. Within units 303, 303.5 and 305 vapor pins will be installed within the central portions of the units. In addition, a vapor pin will be installed within an area where PCE storage area was located within unit 303. See the RSIWP Figure 6.

Giles proposes to sample the floor drains and/or clean outs within units 301, 303, 303.5 and 305 as per the WDNR Guidance for Documenting the investigation of Human-made Preferential Pathways Including Utility Corridors Publication RR-649. The chemicals of concern that will be analyzed for this project included CVOCs by method TO-15 includes a short list of the following parameters: PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, 1,1-DCE, 1,2-1,2-DCA, and VC. See the Revised SIWP Figure 6.

**4. Regarding the proposed vapor mitigation system, Wisconsin Administrative Code NR726.05(8)(b)1. Requires a remedial action be conducted to reduce the mass and concentration of volatile organic 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.**

The owner is planning to replace portions of the concrete floors in units 301 and 303 according to the RP. This will provide a better seal for the proposed vapor mitigation

system. Also, at this time, we can remove CVOC contaminated soil to the extent practicable (utilizing small excavation equipment within the building). Remedial actions will be discussed in more detail within the Remedial Action Plan (RAP), which will be completed in the future.

**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.***

See Figures 2 through 6 within the Revised SIWP.

- 2. Provide figures that include the location of the utilities, previous soil and groundwater sampling locations with the data, as well as the locations of proposed soil and groundwater sampling points.***

See Figures 2 through 6 within the Revised SIWP.

- 3. Review the placement of the proposed soil and groundwater as well as vapor sampling points in relation to utility locations and revise as necessary to assess whether utilities are migration pathways.***

See Figures 6 within the Revised SIWP and see question 3 under vapor above.

- 4. Include all soil boring logs for the borings installed to date and any reports prepared by other consultants for this site.***

The AECOM report dated July 23, 2008, is attached as an Appendix to the Revised SIWP. In addition, the environmental work that Giles performed is also attached as Appendices within the Revised SIWP.

- 5. The report states no basement is beneath the building. Is there a crawlspace 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.***

There is no basement, crawlspace, or other voids beneath the building or the stairs outside. The stairs outside are just concrete. Giles will prepare two cross sections north-south (A-A') and east-west (B-B') which will be incorporated into the Site Investigation Report.



**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.**

Giles will relocate this well to be in line with unit 303. This relocation is shown on Figure 6 within the Revised SIWP.

**Emerging Contaminants:**

- 1. Provide a PFAS/Emerging Contaminants Scoping Statement in the next submittal.**

The temporary monitoring well (BTW-2) was analyzed for PFAS and we acknowledge that PFAS groundwater contamination is present at this site. Currently, there are no WDNR Ch. NR 140 groundwater standards; therefore, we compared the groundwater results to the Wisconsin Department of Health Services.

PFAS groundwater testing is planned for the upcoming field work as part of the SI. For the upcoming groundwater sampling Giles is proposing four sampling events on a quarterly basis for VOCs and PFAS. If the groundwater sampling demonstrates no WAC Ch. NR 140 Preventive Action Level (PAL) and/or Enforcement Standards (ES) exceedances than a shorter duration of testing may be rational.

Please contact the undersigned with any questions.

Very truly yours,

GILES ENGINEERING ASSOCIATES, INC.

Daniel K. Pelczar, P.G., C.P.G.  
Senior Project Manager

Kevin T. Bugel, P.G., C.P.G.  
Environmental Division Manager

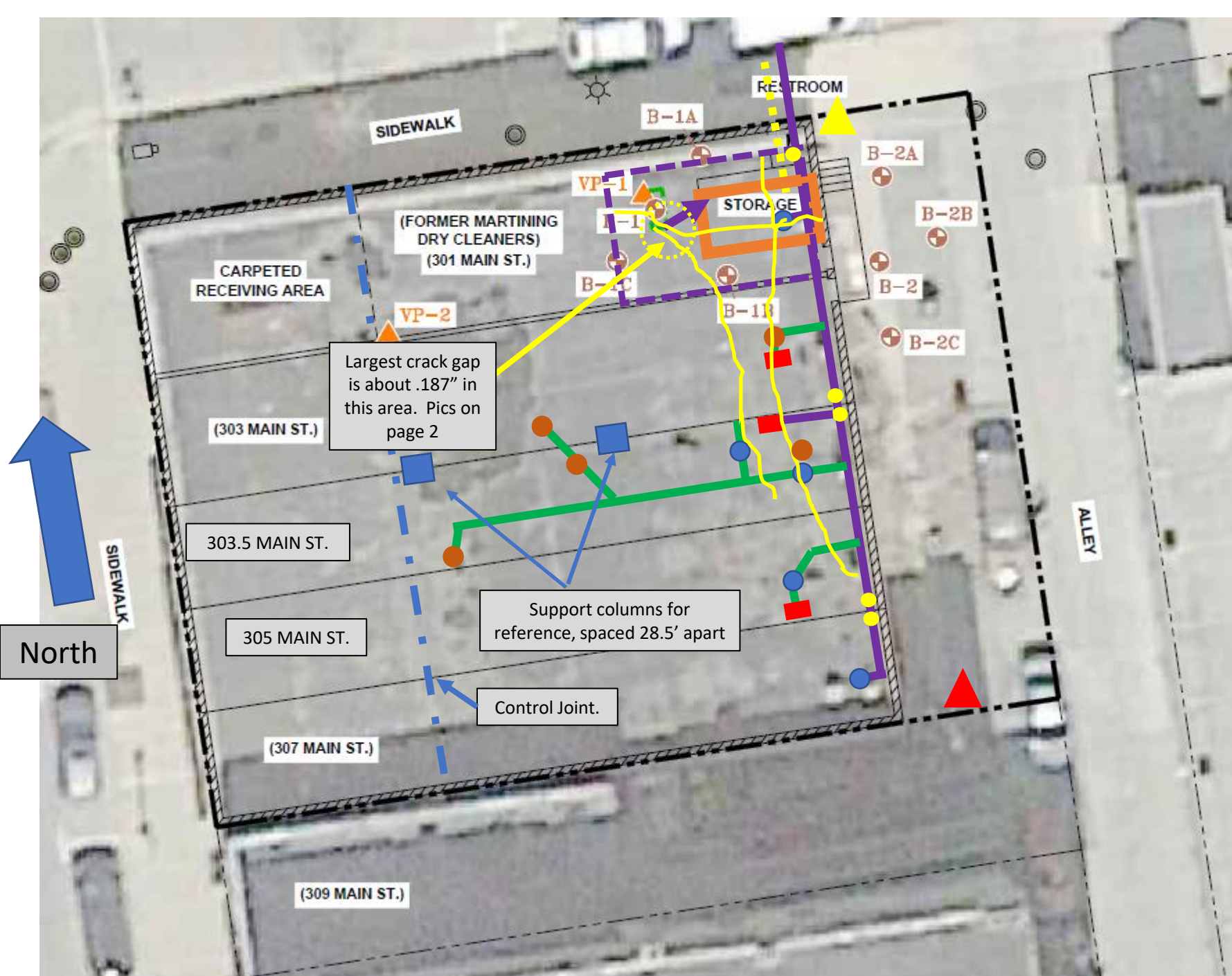
Attachments: Attachment 1 - RP Map and Photos  
Revised SIWP (submitted separately)

Distribution: Wisconsin Department of Natural Resources  
Attn: Ms. Shanna Laube-Anderson (1 copy via electronic upload)  
BMP Reality, LLC  
Attn: Mr. Jason Berry (1 via. [jberry1907@gmail.com](mailto:jberry1907@gmail.com))

**Attachment 1**  
**RP Map and Photos**

## Utility Line Layout - Notes

- Purple line cast iron sewer
- Green line PVC sewer
- Yellow circle toilets
- Blue circles floor drains
- Orange Circles clean outs
- Red Square Utility Sinks that connect to underground
- Yellow lines are cracks in the slabs.
- All water, gas and electric line are above the slab except for the main water into the building, shown in yellow dotted line, comes off 3rd street into the 301 Main storage room, orange rectangle
- Gas line runs outside of the building then into it 301 Storage area, northeast corner, yellow triangle.
- Electrical lines are pole fed from above on the southeast corner of the building, red triangle.
- The slab area highlighted in the purple dash rectangle has slope towards the northeast corner of the building, purple arrow.

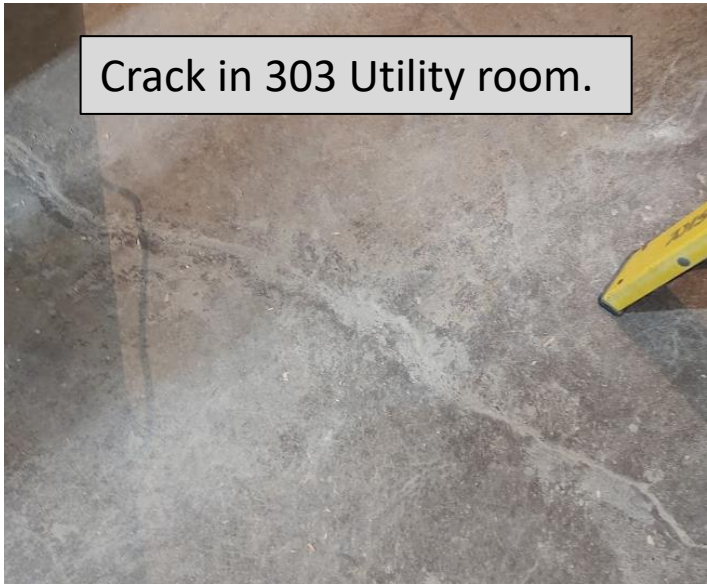




Crack in yellow dash circle.

## Crack details

Crack in purple rectangle area.



Crack in 303 Utility room.



Crack in 301 storage room near floor drain.



Crack in 301 in front of bathroom door.

Backside of building sits about 4' above grade. Front is at grade.

Electrical from above into building.



Sewer and water are in this area on the side of the building.

Gas line outside of building.

