



February 1, 2019

Mr. Henry and Mrs. Diane Ciesinski  
D&H Properties, LLC  
711 Tarawitt Dr.  
Longboat Key, Florida 34228

**SUBJECT:** Review of Off-site Investigation and Remedial Action Options Report  
Sunbrite Cleaners (Former)  
1010 Milwaukee Avenue, South Milwaukee, Wisconsin  
BRRTS #: 02-41-552211, FID #: 241299630

Dear Mr. and Mrs. Ciesinski:

On November 5, 2018, the Wisconsin Department of Natural Resources (DNR) received an *Off-site Investigation and Remedial Action Options Report* (the Report) prepared by GZA GeoEnvironmental, Inc. (GZA) for the former Sunbrite Cleaners located at 1010 Milwaukee Avenue, South Milwaukee, Wisconsin (the Site). The Report was submitted as part of the DNR's Dry Cleaner Environmental Response Fund (DERF) for DNR review.

### **Background**

The Site consists of a 3,600 square foot, two-story, slab on grade building and is zoned for commercial use. The Site has historically been a dry cleaner operating from 1985 to 1988 with 2<sup>nd</sup> floor apartments occupied until 2010. The southern portion of the Site was historically the area of dry cleaning operations while the northeastern portion of the Site was used for drum and material storage. According to the Report, the Site was deemed blighted by the City of South Milwaukee in 2018.

### **Site Investigation Summary**

Site investigation activities have identified the discharge of chlorinated volatile organic compounds (CVOCs) into the soil and groundwater at the Site. Spills associated with the former dry cleaner operations and product drum storage are believed to be the sources of the CVOC discharges. Soil with CVOC concentrations above direct contact residual contaminant levels (RCLs) and groundwater pathway RCLs is present. Groundwater quality data to date indicates CVOC concentrations above the groundwater Enforcement Standard (ES) and Preventive Action Limits (PALs).

### **Site Investigation Review**

The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716. The DNR has determined that additional information and sampling is required to complete the site investigation and provides the following comments below:

- Define Degree and Extent

Wis. Admin. Code § NR 716.11(3)(a) requires the field investigation to determine the nature, degree, and extent both areal and vertical, of the hazardous substances or environmental pollution in all affected media.

#### Soil Pathway

- (a) The Report indicated CVOC contamination in the area of the former dry cleaning operations and in the drum storage area above direct contact RCLs and groundwater pathway RCLs. Soil impacts with RCL exceedances around GP-5 are not clearly defined. Further sampling should be conducted to the north, east, south, and west of GP-5. Efforts should be made to determine if CVOC contamination is one large plume or if it is in two separate plumes, one to the north around the former drum storage, and one to the south near the former operations area, separated by the underground waterline utility.
- (b) Soil impacts with RCL exceedances around GP-3 are not clearly defined. Further sampling should be conducted off-site to the east of GP-3 and west of PZ-1. The vertical extent of contamination is not known around GP-3 and a sample should be taken at depths below known contamination to define the vertical extent of impacts at the Site.

#### Groundwater Pathway

- (a) Groundwater impacts with ES exceedances at GP-3 are not defined down gradient and off-site to the east. Future soil sampling conducted east of GP-3 should be converted into a Wis. Admin. Code ch. NR 141 compliant monitoring well and sampled to define the degree and extent of groundwater contamination off-site to the east.

#### Vapor Pathway

- (a) Indoor air samples taken at the Site historically had elevated CVOC detections above applicable Vapor Action Levels (VALs). A vapor mitigation system was installed at the Site in 2011. Due to the elevated concentrations of CVOCs detected in indoor air samples, two or more sub-slab samples should be taken near each source on-site to define the degree and extent of CVOC vapors at the Site. RR-800 vapor sampling guidance should be followed as it pertains to shutting down the vapor mitigation system and conducting vapor sampling.

- (b) An *Investigation Work Plan, Former Sunbrite Cleaners, 1010 Milwaukee Ave, South Milwaukee, Wisconsin* submitted on April 5, 2016 stated that the vapor intrusion potential would be investigated to the adjacent property to the west of the Site. The work plan proposed sub-slab vapor sampling to determine the degree and extent of vapor contamination on-site and the potential migration of CVOC vapors off-site. Indoor air samples are not sufficient to evaluate the vapor migration pathway. Sub-slab vapor samples should be taken on-site for each known source of contamination to define the degree and extent of vapor contamination on-site. Because indoor air samples were taken off-site to the west, and not sub-slab vapor samples as previously proposed, sub-slab vapor samples should be taken off-site to the west to define the degree and extent of CVOC vapor migration off-site and to determine the risk of vapor intrusion to the adjacent off-site building.
- (c) Underground utilities should be evaluated as a preferential vapor pathway.

- Visual Aids

Wis. Admin Code § NR 716.15(4)(c) requires the site investigation report to include isoconcentration maps to depict the hazardous substance concentration in each environmental medium.

Wis. Admin. Code § NR 716.15(4)(d) requires the site investigation report to include cross sections that include contamination sources, vertical and horizontal extent of contamination in soil and groundwater, and water tables.

Visual Aids

- (a) Include a B-B' cross section that runs north to south through the northern source area associated with material drum storage.
- (b) Include utilities, building foundations and basements, where applicable, in the included cross sections.
- (c) Include known contamination in both soil and groundwater on cross sections.
- (d) Include all known contamination on the isoconcentration maps within their appropriate isoconcentration line. For example, GP-1 had tetrachloroethene (PCE) detections at 48 µg/kg but was not included within the applicable isoconcentration line.
- (e) Verify all data on tables and figures is appropriately flagged when applicable. For example, GP-3 on the groundwater data table reads "<6.4J".

- Professional Certification

Wis. Admin. Code § NR 712.09(3) requires that the appropriate certification in pars. (a) to (c) shall be attached to all submittals to the department to demonstrate that the requirements of s. NR 712.07 have been met.

Professional Signatures

- (a) A Professional Engineer (P.E.) signature is required along with the Professional Geologist signature for Wis. Admin. Code ch. NR 716 Site Investigation submittals.

Clarification of Site Conditions

The DNR reviewed the Report and has determined that additional information regarding the Site and surrounding off-site properties is needed to determine the completeness of the site investigation.

- (a) Additional information regarding the historical site use is needed to adequately understand all potential environmental concerns at the Site. Provide a detailed historical use for the Site.
- (b) Discuss the current use of the Site, including the garage, and the adjacent neighboring properties to the east and west.
- (c) The Report stated that several properties, including the Site, have recently been deemed blighted by the City of South Milwaukee. Discuss which surrounding properties have been blighted by the City and which are still occupied and operational.
- (d) Discuss the status of the current floor condition on the Site. Also, provide a status update of the mitigation system installed at the Site.

Future Submittals & DERF

The DNR provides the following comments as it pertains to the Report, future submittals, and the DERF program.

- (a) Due to the nature of the fill material noted in the boring logs, a *Development at Historic Fill Site or Licensed Landfill Exemption* will be needed for any future developments at the Site.

- (b) As required by Wis. Admin. Code ch. NR 169, Remedial Action Options Reports (RAOR) are no longer part of site investigation reports. Wis. Admin. Code ch. NR 169 outlines the process for the DERF reimbursement program and requirements for reimbursement. That process requires the DNR approve a site investigation. Following the approval of a site investigation by the DNR, the DERF applicant must solicit a minimum of 3 remedial action bids. Each remedial action bid must contain a Wis. Admin. Code ch. NR 722 technical and economic analysis of the proposed remedial action as outlined in RR-756, *Remedial Action Bid Checklist*.

Since additional site investigation is needed to address soil, groundwater, and vapor impacts, and due to the remedial bid requirements within the DERF program, the DNR will reserve commenting specifically on the remedial options presented in the Report. Following additional site investigation activities, a comprehensive site investigation report should be submitted and approved before soliciting bids for remedial options.

### **Schedule**

A DERF change order is required to capture the additional work needed. This change order should include the costs to prepare a Site Investigation Work Plan to complete the site investigation activities and preparation of a comprehensive Site Investigation Report. Please submit a change order and work plan within **60 days** of the date of this letter, by **April 1, 2019**, describing how you will accomplish the work necessary to complete the site investigation. Once the additional information is received and the site investigation activities are completed, the DNR recommends submitting a comprehensive site investigation report including on and off-site data. Following the DNR approval of a site investigation report, you may solicit bids for remedial actions.

Note that sampling results must be submitted to the DNR within 10 business days of receiving the sample results, and a supplemental site investigation report must be submitted within 60 days after the completion of the additional field investigation.

We appreciate your efforts to restore the environment at the Site. If you have any questions or concerns regarding this letter, please don't hesitate to contact me at (414) 263-8519, or by email at [issac.ross@wisconsin.gov](mailto:issac.ross@wisconsin.gov).

Sincerely,



Issac Ross  
Project Manager – Hydrogeologist  
Remediation and Redevelopment Program

cc: Janeé Pederson, GZA GeoEnvironmental Inc.