

From: Schultz, Josie M - DNR
Sent: Thursday, March 4, 2021 5:05 PM
To: 'Hodgson, Scott A.'
Subject: Smoke-Out Cleaners, BRRTS 02-05-552214, Follow-up

Hi Scott,

Thanks for taking the time to discuss Smoke-Out Cleaners last Tuesday. Based on our conversation, and a follow-up conversation I had with the Vapor Team Leader, Jennifer Borski, and the regional peer review group, DNR has the following comments and recommendations prior to considering closure:

1. Verify through pressure field extension testing data that the existing VMS captures VP-8 (PCE/TCE >> VRSL) up to VP-3 (PCE/TCE < VRSLs).
2. Additional indoor air sampling at the Badger Scale unit immediately to the south is needed due to TCE > VRSL. A second event should be collected to supplement the previous IA event performed by Giles in 10/2017. If the intent remains to shut down the VMS, DNR suggests the IA sampling at Badger Scale wait to be combined with the decommissioning sampling. The intent being to verify no exposure is occurring after interim & RA.
3. The adjacent building to the east is less than 100 ft from the soil source. It is unclear if a VI investigation is needed at this location with the operating VMS and injection performed. We need more information about the business in that location and sanitary lateral information for further consideration. If post-injection soil data is collected in addition to sub-slab vapor data, this should be further considered when evaluating whether a VI investigation is needed at the adjacent building.
4. The sanitary sewer preferential pathway should be investigated since this is a former active dry cleaner. If the septic includes a drain field, the drain field should also be investigated if found to be impacted. If the septic is a holding tank, we still need to consider vapor migration into occupied spaces from the sewer, if found to be impacted. This would include a vapor grab sample from the sanitary clean-out.
5. Please review Appendix F of [RR-800](#), decommissioning guidelines for a sub-slab depressurization system (SSDS): collect at least three rounds of sub-slab samples (2-4 weeks post shut-down; 2-6 months & 1 year with at least two events during the heating season).
6. DNR will need to review at least 8 rounds of quarterly post-injection groundwater monitoring data prior to considering site closure before all injection compounds have been spent.

Additional consideration:

- Although the dry cleaner machine was removed prior to the injection and Smoke Out Cleaners no longer operates as an active dry cleaner, they do still operate as a dry store (i.e., drop off location). Assuming they continue to hold dry-cleaned items for customer pick-up and the business does not vacate prior to the closure request, we are still unable to have the indoor air assessed within this unit. As such, the appropriate continuing obligation(s) will need to be assigned at the time of case closure to limit use of the unit to the dry cleaner. The indoor air of the unit will need to be assessed prior to a change of use to another commercial business that does not utilize PCE. DNR will likely consider s. NR 716.15(2)(m) for "future risk". Since the contaminants of concern are chlorinated solvents, DNR may require the property owner be required to submit an annual inspection form (4400-303) verifying occupancy for this unit.

Please feel free to contact me if you have any questions or concerns with the above information.

Thank you,
Josie

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