



February 8, 2022

Smoke-Out Cleaners, LTD
Attn: Mr. Mark Woppert
535 Half Mile Road
Verona, WI 53593

Sent via electronic mail only to mark.woppert@smoke-out.net

Team Bay, LLC
Attn: Chris Dockry
2105 Springcrest Place
Green Bay, WI 54304

Sent via electronic mail only to chris@teamsselfstorage.com

Subject: Conditional Approval of the Remedial Action Documentation Report
Smoke Out Cleaners, 1631 Brookfield Avenue, Village of Howard, Wisconsin
BRRTS # 02-05-552214

Dear. Mr. Woppert & Mr. Dockry:

On December 27, 2021, the Wisconsin Department of Natural Resources (DNR) received the *Remedial Action Documentation Report Technical Review (RADR)*, dated December 16, 2021, from Terracon Consultants, Inc (Terracon) for the above referenced site. This report was submitted to meet the requirements of Wis. Admin. Code § NR 724.15 and included a \$350.00 review fee. On January 20, 2022, DNR completed the review of the RADR and determined that it satisfactorily met the requirements of Wis. Admin. Code § NR724.15. This RADR documents the injection of approximately 1,224 gallons of amendment and water into the groundwater at the site.

The RADR is conditionally approved with the understanding that groundwater monitoring will continue at the site for approximately two years following the degradation of the injected amendment. Per a phone conversation with your consultant, Scott Hodgson of Terracon, the amendment is expected to be fully degraded within three to four years and is dependent on monitoring of total organic carbon concentrations in groundwater.

While reviewing the RADR, DNR also noted the following concerns with the site investigation that require additional investigation and/or information:

1. Groundwater

Groundwater is defined laterally, however DNR is requiring an evaluation of if the vertical extent is defined in the source area, including direction of deep groundwater flow and depth and

construction of on-site potable wells. If adequate justification cannot be provided for vertical extent being defined, then a piezometer may need to be installed within or directly adjacent to the source area. If contamination is present in the groundwater at depth, additional evaluation may be needed to define the extent.

As outlined above, additional rounds of groundwater sampling are required to confirm decreasing chlorinated volatile organic compound (CVOC) trends post-degradation of the injected amendment. This is to include continued monitoring of natural attenuation parameters, and annual sampling of monitoring wells exterior of the source area to ensure the injection is not pushing contamination elsewhere.

2. Vapor

In the attached email sent to Scott Hodgson on March 4, 2021, DNR stated that additional vapor sampling is required at the site, including a sanitary sewer investigation, indoor air sampling at the adjacent Badger Scale tenant space to the south, and potentially sub-slab sampling beneath the adjacent Diamond Builders tenant space to the north.

DNR understands that the vapor mitigation system (VMS) is planned to be decommissioned in the near future. DNR guidance RR-800 requires three rounds of sampling after shut-down as part of decommissioning; first event 2 to 4 weeks after shut-down, second event 2 to 6 months after shut-down, and third event 1 year after shutdown, with at least two of the samples collected during heating season. Before fully decommissioning the system, you must provide data to the DNR that supports the criteria for decommissioning and request DNR's approval to remove the vapor mitigation system from the property. Once removal is approved, dismantling/abandonment of the system will need to be documented and submitted to the DNR.

If indoor air and sub-slab vapor sampling results in concentrations still exceed small commercial vapor risk screening levels (VRSLs), the VMS will need to be turned back on and continue operation. Proper documentation, including an interim action report and long-term operation, monitoring & maintenance (OM&M) plan, will need to be submitted to the DNR for the system. A continuing obligation will also be assigned to the site for the OM&M and annual inspection of the VMS.

3. PFAS Scoping

Prior to DNR providing an answer for if PFAS sampling is required, DNR needs additional information on site operations and history, including:

- confirmation that the drycleaner began operation in 2005;
- information for the source of contamination (i.e. new or used solvent) and the estimated duration of discharge (e.g. past practices, known discharges);
- information for what type of materials were dry cleaned on site (e.g. large commercial or household items); and
- an evaluation of if a PFAS investigation is needed in the area of the holding tank.

Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of an adequate justification for groundwater vertical delineation and/or a supplemental work plan to evaluate groundwater at depth, additional PFAS scoping information, and VMS decommissioning schedule including vapor sampling workplan within 60 days of the date of this letter, by **April 11, 2022**. The work plan must comply with Wis. Admin. Code § NR 716.09(2). A fee is recommended for DNR review and response.

The DNR appreciates your efforts to remediate and restore the Smoke Out Cleaners site. Please contact me at 920-366-5685 or josie.schultz@wisconsin.gov if you have questions related to this letter.

Sincerely,



Josie Schultz
Hydrogeologist
Remediation & Redevelopment Program

Att: March 4, 2021 Email

Cc: Scott Hodgson, Terracon Consultants, Inc (scott.hodgson@terracon.com)
Allen Morin, Allen Lee Investments, LLC (atrailside@aol.com)
Donald Gallo, Axley Brynelson, LLP (dgallo@axley.com)

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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Josie M. Schultz

Hydrogeologist – Northeast Region Remediation and Redevelopment Team

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