



October 26, 2022

Mr. Mark Woppert  
Smoke Out Cleaners Ltd  
535 Half Mile Rd  
Verona, WI 53593

*Sent via electronic mail only to [mark.woppert@smoke-out.net](mailto:mark.woppert@smoke-out.net)*

Mr. Chris Dockry  
2105 Springcrest Pl  
Green Bay, WI 54304

*Sent via electronic mail only to [cdockry@gmail.com](mailto:cdockry@gmail.com)*

Subject: Approval of Supplemental Vapor Intrusion Investigation  
and System Decommissioning Work Plan  
Smoke Out Cleaners, 1631 Brookfield Ave, Howard, WI 54313  
BRRTS # 02-05-552214

Dear Mr. Woppert & Mr. Dockry:

On September 15, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Supplemental Vapor Investigation and System Decommissioning Work Plan* (“Work Plan”) prepared for Smoke Out Cleaners Ltd by Terracon Consultants Inc. The Work Plan was submitted with a fee for DNR review and response. The submittal of a Work Plan is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. Ch.292. The DNR reviewed the Work Plan for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

### **Work Plan Summary**

The Work Plan proposes the following additional work to investigate the sanitary sewer, and decommission the on-site vapor mitigation system:

- The sanitary sewer vapor investigation includes grab vapor samples (i.e. no flow controller) from two access points:
  - Grab sample from south floor drain (closest to the former dry-cleaning machine)
    - Remove liquid from P-trap, insert sample tubing past trap, connect to a plug modified with a valved sample port that will be inserted into the drainpipe, then allowed to equilibrate for an hour after sealing.
  - Grab sample from cleanout beneath boiler room
    - Remove cap and replacing with temporary cap that contains a valved port for sample tubing. Tubing will be inserted several feet into the sanitary lateral, then allowed to equilibrate for an hour after sealing.

- Vapor Mitigation System (VMS) decommissioning plan:
  - Follow Appendix F Decommissioning guidelines in RR-800
    - Shut off sub-slab depressurization system (SSDS) fan;
    - First round of sub-slab samples obtained 2-4 weeks after shutdown;
    - Second round of sub-slab samples obtained 2 to 6 months after shutdown;
    - Third round of sub-slab samples obtained within a year after shutdown.
  - Three rounds of sub-slab vapors will be obtained from VP-3, VP-4, VP-5, VP-6, VP-7, and VP-8, along with indoor air sampling within the Badger Scale tenant space, in the location of VP-7.
    - Two sampling events will be performed during the heating season (i.e. winter).
  - If at any time the vapor risk screening level (VRSL) is exceeded, the system will be turned active.
  - If VRSLs are not exceeded in any sampling event, the system will be removed.
    - A system decommissioning report will be submitted to document removal of the system.
- All vapor samples will only be analyzed for drycleaner chlorinated volatile organic compounds (CVOCs).

### **DNR Review of the Work Plan**

Following the DNR's review of the Work Plan, DNR concurs that you can proceed with the proposed work, with the following comments:

- Vapor
  - DNR considers this property to be small commercial, thus the sub-slab vapors cannot exceed small commercial VRSLs.
    - If you disagree with DNR's small commercial determination, you may submit justification for why this building should be considered large commercial.
  - In Section 3.0, *System Decommissioning*, of the Work Plan it states that only VP-4, VP-5, VP-7 and VP-8 will be sampled as part of decommissioning, and in section 5.1, *Sub-Slab Vapor Sampling*, it states that VP-3 and VP-6 will also be sampled.
    - DNR agrees with the addition of VP-3 and VP-6 into the decommissioning sampling plan.
  - If the VMS remains running, pressure field extension (PFE) testing will need to be completed at all monitoring points, including VP-3 and VP-8 to ensure the radius of influence captures these two monitoring points.
    - VP-8 has had consistent large commercial VRSL exceedances, and VP-3 had a small commercial VRSL exceedance in 2016, thus the vacuum needs to capture both monitoring points.
  - DNR agrees that a vapor investigation within the adjacent building is not warranted at this time based on information that there are no documented utilities acting as a preferential pathway between buildings and the building is more than 100 feet from known soil contamination.

October 26, 2022  
Mr. Mark Woppert, Smoke Out Cleaners Ltd  
Mr. Chris Dockry  
Approval of Work Plan  
Smoke Out Cleaners, BRRTS # 02-05-552214

- Groundwater
  - DNR has also reviewed the justification provided for the vertical extent of groundwater contamination, and DNR agrees that vertical extent of contamination is defined.
  - DNR also agrees that only one more year of post-injection monitoring is required as total organic carbon concentrations have decreased and plateaued.

The DNR agrees with the anticipated schedule outlined in section 7.0, *Anticipated Schedule*, of the Work Plan.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-366-5685 or [josie.schultz@wisconsin.gov](mailto:josie.schultz@wisconsin.gov).

Sincerely,



Josie Schultz

Project Manager – Hydrogeologist  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

Cc: David Tenor, Howard Self Storage ([howardselfstorage@gmail.com](mailto:howardselfstorage@gmail.com))  
Scott Hodgson, Terracon ([scott.hodgson@terracon.com](mailto:scott.hodgson@terracon.com))  
Donald Gallo, Gallo Law, LLC ([dongallolaw@outlook.com](mailto:dongallolaw@outlook.com))