

**From:** Schultz, Josie M - DNR  
**Sent:** Monday, October 16, 2023 4:03 PM  
**To:** Hodgson, Scott A.  
**Cc:** mark.woppert@smoke-out.net; Chris Dockry  
**Subject:** DNR Response to Status Update - Smoke Out Cleaners, BRRTS # 02-05-552214

Hi Scott,

Thank you for the conversation this morning to discuss the Smoke Out Cleaners site and DNR's consultation with the Wisconsin Department of Health Services (DHS) regarding the recent status update.

The update contained information regarding the sanitary system; the site has a sanitary sewer holding tank and a floor drain holding tank in lieu of a septic system or connection to municipal sewers. Based on our conversation, all floor drains pitch to the south towards the floor drain holding tank on the south end of the building. This floor drain holding tank is fairly small and the maintenance person regularly cleans it out as it become inundated with sludge. This floor drain holding tank's outfall goes into the sanitary line which leads back to the 10,000 gallon, approximately 30'x10', sanitary holding tank to the west of the Smoke Out Cleaners space. The septage hauler visits the site on a weekly basis to empty the 3-4 holding tanks on the property as needed.

The update stated that the on-site SSDS has been shut down and the first two rounds of decommissioning sub-slab sampling were completed in January and August of 2023. The most recent vapor sampling results show that PCE and TCE are increasing in sub-slab and are present at concentrations greater than the residential VRSLs. The south floor drain adjacent to the former dry cleaning machine also had PCE, TCE, cis-1,2-DCE & VC present above VALs, however, lower than the initial detections.

Based on DNR and DHS's review, DNR presents the following comments for recommended next steps:

- The floor drain needs to be either abandoned if no longer needed, vegetable oil added, or a Dranjer vapor plug or similar added for better vapor protection than water in the p-trap to protect from conduit vapor intrusion.
  - Based on our conversation, it sounds like this drain is used regularly, so I would recommend a Dranjer plug or similar be installed and to discuss this with a plumber.
- The connection of sewers between the piping, floor drain holding tank & sanitary sewer holding tank needs to be investigated to confirm connections as well as integrity of the holding tanks.
  - As discussed, I would recommend contacting the septage hauler to see if a leak test would be able to be performed on the holding tanks. If this cannot be performed, or tank(s) are shown to be leaky, then DNR would recommend soil and/or groundwater sampling be performed to show that there has not been a release from these tank(s).
- Indoor air sampling is needed within the dry store unit since breakdown products (especially TCE) are present in conduits above VALs. This is a concern for indoor air beyond the off-gassing of PCE from dry cleaned clothes brought to the store.
- The sub-slab vapor increasing data trend post shut down is concerning. If the third event is still below the VRSLs but data continues to increase, more sampling will be needed to show a leveling off of data below the VRSL before decommissioning can be approved.

- The Black Diamond Builders unit to the north is on the same sewer lines as the dry cleaner and DHS supports indoor air sampling of this unit. You could sample the floor drain to the north and the north sewer cleanout first but if VAL exceedances exist, indoor air sampling will still be needed.
- It is unclear if there is a floor drain in the Great Outdoors Garage Door Co unit. If so, this unit should also be investigated in the drain/cleanout and/or indoor air sampled.

Please submit a workplan for this supplemental investigation that is required for the site and as always, feel free to contact me if you have any questions.

Thank you,  
Josie

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**Josie M. Schultz**

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