

## Schultz, Josie M - DNR

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**From:** Schultz, Josie M - DNR  
**Sent:** Thursday, September 9, 2021 3:46 PM  
**To:** Dillon Plamann; 'Jim Mohr'  
**Cc:** Matt Dahlem; Chancellor, Sandra D - DNR  
**Subject:** Tidy Cleaners SIWP notice to proceed and Change Order Approval, BRRTS # 02-05-552220  
**Attachments:** 20210909\_99\_Change\_Order\_Appr.pdf

Good Afternoon Dillon & Jim,

I've had a chance to review the supplemental site investigation workplan and change order for Tidy Cleaners; the change order approval is attached. Everything looks good, and you can accept this email as your notice to proceed with the following comments:

1. Although DNR accepts fewer rounds of groundwater monitoring, Wis Admin Code 726.09(2)(e) requires a minimum of 8 successive quarterly rounds of sampling to demonstrate stable contamination plume. If four rounds of sampling can show stable and/or decreasing trends, this may be acceptable.
2. Placement and sampling procedures for the vapor ports makes sense to me. Please note that if small commercial VRSLs are exceeded, then a source removal (e.g. active remedial action) will be required. A vapor mitigation system will also be required with proper commissioning and long-term OM&M, however a mitigation system is not considered to be a source removal.
3. Scoping for the sanitary sewer during the initial round of vapor and groundwater sampling sounds like a good plan. Since this scope isn't submitted with this workplan, please submit an additional workplan containing the manhole and/or cleanout locations you plan to sample for the sanitary sewer vapor investigation. I also noted that you're planning to sample using 6-Liter summas with 30-minute flow controller; these sanitary sewer investigations can be completed via grab sample using 1-Liter summas with no flow controller. If these results come back elevated, an additional round may be required.

If you have any questions, please feel free to give me a call to discuss.

Thank you,  
Josie

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**Josie M. Schultz**

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