

February 26, 2021

via email only to: Jennifer.Dorman@wisconsin.gov

Jennifer Dorman, Environmental Program Associate
Wisconsin Department of Natural Resources
2300 Martin Luther King Drive
Milwaukee, WI 53212

Re: WDNR BRRTS #02-41-552537
Westwood Dry Cleaners
8731 W. North Avenue
Wauwatosa, WI 53226

Dear Ms. Dorman:

Please be informed that I represent Ms. Amy Dean, owner of the residential property at 8728 Jackson Park Boulevard, Wauwatosa, WI 53226. Her property is south of this BRRTS site, across the alley behind the Westwood Dry Cleaners facility. Last summer the Dry Cleaners' consultants installed two monitoring wells in the alley, located approximately a foot or so from her property line.

Their Additional Site Investigation Report dated August 27, 2020, found two volatile organic compounds in monitoring well 8, the western of the two wells in the alley. Cis-1,2-Dichloroethene was found at 23 micrograms per liter, or about 1/3 of the Enforcement Standard for that chemical in groundwater; Tetrachlorethene (or perchlorethene) was found at 10 micrograms per liter, twice the Enforcement Standard. No contaminants were detected in monitoring well 7, the eastern well. The consultants prepared a map suggesting that a plume of contamination was present extending onto portions of the alley, based on the contamination found in the one well, but not onto the adjacent Dean property.

A Quarterly Groundwater and Soil Vapor Monitoring/Sampling Report was prepared on January 12, 2021. In December, neither cis-1,2 Dichloroethene or Tetrachloroethene were found in either of the two wells. However, Trichloroethene was found at a concentration of 1.1 micrograms per liter in both wells. That is about 1/5th of the Enforcement Standard for that chemical, but more than double the Preventive Action Limit. The consultants' map now represents the plume of groundwater contaminated at or above the Enforcement Standard as extending approximately halfway across the alley, more or less parallel to the Dean property line. The consultants assert that the contamination plume has been stable, and have recommended that quarterly monitoring of the groundwater stop, and that the site be conditionally closed.

For the following reasons, Ms. Dean objects to both requests. Groundwater elevations and migration patterns can and often do vary seasonally. That is why a series of at least 4 "clean" quarterly monitoring results is normally viewed as evidence that a monitoring location

wells 7 and 8 were both found to be contaminated with trichloroethene, at concentrations more than double the PAL, within about one foot of the Dean property. Vinyl chloride, another degradation product of the tetrachloroethene that was released, was not detected in either well, but the reported limit of detection was 2 micrograms per liter, which is 10 times as high as the Enforcement Standard.

I respectfully submit that the monitoring data presented on behalf of the site owner is nowhere near sufficient to demonstrate either the horizontal extent nor the stability of the plume of contaminated groundwater that extends offsite of the dry cleaning property itself. As a result, quarterly groundwater monitoring should be required to continue until sufficient evidence to justify closure of the site is obtained.

Your consideration is appreciated. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Dennis M. Grzezinski

cc: Amy Dean

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