



September 1, 2022

Tim Detzer
Milwaukee County
633 W. Wisconsin Avenue, Suite 1003
Milwaukee, WI 53203

Subject: Review of *NR 716 Site Investigation Work Plan*
2736 W. Layton Avenue, Greenfield, WI
BRRTS #: 02-41-558578, FID #: 241439990

Dear Mr. Detzer:

On June 27, 2022, the Wisconsin Department of Natural Resources (DNR) received the *NR 716 Site Investigation Work Plan* (SIWP) prepared on your behalf by LF Green Development LLC. The SIWP was submitted with a technical assistance fee for DNR review and a written response.

Background

Prior to 1967 the property was undeveloped. The onsite structure was built in 1967, at which point dry cleaning operations began. At an unknown point after dry cleaning operations began, the property was sold and used as a furniture refinishing business until 2011. Site investigation activities began in 2011. Milwaukee County acquired the property through tax delinquency in 2017. The property acquisition qualified Milwaukee County for a local government unit exemption under Wis. Stats. 292.11(9)(e). Site investigation activities conducted to date have identified lead, polycyclic aromatic hydrocarbons, and chlorinated volatile organic compounds in soil at concentrations greater than their respective Wis. Admin. Code ch. NR 720 groundwater pathway, and non-industrial direct contact, and/or industrial direct contact residual contaminant levels.

SIWP Review

The DNR reviewed the SIWP for compliance with Wis. Admin. Code §§ NR 716.07 and 716.09. Based on the evaluation of the currently available information, the DNR generally concurs with the site investigation activities proposed within the SIWP, but provides the following comments:

General:

- On Figure 2 of the SIWP, for soil sampling locations P-1 through P-4, the tetrachloroethylene (PCE) and trichloroethylene (TCE) concentrations are switched. This should be corrected on future figures.
- Site figures that display data must include a key to indicate what the colors are referencing.
- Include any exceedances of DNR standards on the applicable site figures.
- Include the locations (or suspected locations) of utilities and sources (i.e., dry cleaning machines, container storage, etc.) on site figures.
- Include the internal layout of the onsite building and any offsite buildings, and features, including basements, sumps, drains, etc.

Soil:

- The DNR understands that the sampling intervals will be determined using previous sampling data and field observations. Ensure that you are able to adequately define degree and extent vertically and

horizontally. Additionally, consider sampling within the 0-2 feet below ground surface interval, as this interval has not yet been sampled.

- Regarding the proposed per- and polyfluoroalkyl substances (PFAS) sampling, DNR has a list of 33 compounds that should be analyzed at a Wisconsin certified lab:
<https://dnr.wisconsin.gov/sites/default/files/topic/PFAS/LabUpdate20210301.pdf>. Here is more information on the lab certification: <https://dnr.wisconsin.gov/topic/PFAS/Labs.html>.
 - DNR understands that LF Green Development LLC will follow EPA guidance on PFAS sampling protocol.

Groundwater:

- The above statements regarding PFAS apply for groundwater sampling as well.
- Groundwater contamination attributed to this site has been identified at the Roberto's Mufflers & Brakes property north of the site (see BRRTS #: 07-41-589110). Additional sampling at the Roberto's property needs to be conducted to define the degree and extent of groundwater contamination and to establish contaminant concentration trends. If the monitoring wells on the Roberto's property were abandoned new Wis. Admin. Code ch. NR 141 compliant monitoring wells should be installed.

Vapor:

- Refer to DNR guidance documents RR-800 and RR-986 for guidance regarding the proposed vapor intrusion sampling.
- A vapor intrusion screening assessment should be conducted following the guidance of RR-800. It is the DNR's interpretation that, based on the screening criteria set forth in RR-800, the following addresses screen in and should be sampled:
 - 2720 W. Layton Avenue
 - 2730 W. Layton Avenue
 - 2744 W. Layton Avenue
 - 2800 W. Layton Avenue
 - 4671 S. 27th Street – one round of vapor sampling at the Roberto's property has been completed, but a second round should be conducted.
- Vapor intrusion sampling of the above properties should include sub-slab sampling at the lowest level of the structure and indoor air sampling on each floor of the structure.
- One ambient air sample could be collected for all properties, since they are in proximity.
- It is recommended that indoor air be sampled at the subject property in addition to the sub-slab vapor sampling.
- At the subject property, a sump headspace sample should be collected after the sump is sealed and allowed to equilibrate. If there is any water in the sump, a sump water sample should be collected for analysis.

Preferential Pathways:

- Evaluate the site for possible preferential pathways along which the contamination may migrate, such as drainage improvements, utility corridors, or permeable materials. Sampling the soil, groundwater, and/or vapor in these preferential pathways will likely be necessary for completion of the field investigation.

The site investigation can be an iterative process. Additional sampling may indicate that further assessment is needed to define the degree and extent of contamination in all affected media.

Schedule

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

- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.

- Per Wis. Admin. Code § NR 716.15(1), a site investigation report shall be submitted within 60 days after the completion of the field investigation.
- Per Wis. Admin. Code § NR 716.14, sampling results shall be reported to the DNR and to the property owner, and occupants or off-site properties as appropriate, within 10 business days of receiving the sample results. DNR Form 4400-249 (<https://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf>) can be used to send in the sampling data.
- NR 700 semi-annual reports are required until the case is closed.

The DNR appreciates your efforts to address the contamination at this site. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414) 750-7030 or via email at Riley.Neumann@wisconsin.gov.

Sincerely,



Riley D. Neumann
Hydrogeologist/Project Manager
Remediation & Redevelopment Program

Cc: Kate Juno, LF Green Development LLC (electronic)