



May 15, 2015

Mr. Ronald Collison
2140 N 93rd Street
Wauwatosa, WI 53226

SUBJECT: Review of Site Investigation Work Plan, dated February 15, 2015
Vogue Cleaners, 1416 N 4th Street, Milwaukee, WI
WDNR BRRTS Activity #: 02-41-559223
FID #: 241279170

Dear Mr. Collison:

On March 16, 2015 the Wisconsin Department of Natural Resources (the Department) received a Site Investigation Work Plan (the Work Plan) prepared by EnviroForensics for the Vogue Cleaners site at 1416 N 4th Street, Milwaukee, WI. The Work Plan stated that soil contaminated with petroleum and chlorinated solvent compounds associated with former dry cleaning operations is present at this property. The Department requires that a Site Investigation (SI) be completed to determine the degree and extent of the identified contamination.

A fee was paid to the Department to review the Work Plan and determine whether the proposed activities will complete the SI. The Department provides the following comments regarding the proposed activities:

- 1) The Work Plan proposes to advance 21 direct-push soil borings and convert each to a temporary well to assess soil and groundwater impacts.
 - a. The Department concurs with the proposal to advance 21 direct-push borings to assess soil and groundwater impacts and recommends that all borings proposed on the 1416 N 4th Street parcel be completed in the first phase of work. This data will be necessary to assess any potential off-site migration and will allow for better location selection when placing permanent monitoring wells.
- 2) The Work Plan proposes to advance four (4) hand auger soil borings inside the building to determine the degree of contamination at an assumed source area.
 - a. The Department concurs with the proposed hand auger soil borings.
- 3) The Work Plan proposes to advance one (1) deep boring to determine the vertical extent of contamination.
 - a. The Department concurs with the advancement of one (1) deep boring to determine the vertical extent of contamination and recommends placement in a location that best meets characterization requirements of Ch. NR 716, Wis. Admin. Code.
- 4) The Work Plan proposes to install six (6) permanent monitoring wells to determine groundwater flow direction and one (1) piezometer to evaluate vertical contaminant migration.
 - a. The Department concurs with the proposal to install six (6) permanent monitoring wells and one (1) piezometer to evaluate groundwater flow and contaminant trends.

- b. It is assumed (though not mentioned directly in the Work Plan) groundwater samples will be analyzed for Volatile Organic Compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs). In addition to these compounds, sampling for natural attenuation parameters should be considered.

In addition to the items listed above, the Department has the following comments:

- 5) Following the proposed inventory and characterization of the contents of product containers stored on site, containers should be promptly removed and disposed of according to applicable regulations so as to minimize the potential for stored products to act as a continuing source of contamination.
- 6) The work proposed is considered to be an appropriate step to completing a Site Investigation; however data obtained through these activities may prompt additional investigation. At a minimum, additional groundwater monitoring will be required. In addition, the neighboring property (1422 N 4th Street) may require investigation as it relates to contamination from the source property (1416 N 4th Street).
- 7) As long as the site remains open you must continue to submit NR700 semi-annual progress reports.
- 8) Analytical results must be reported to the Department within 10 business days of receiving the results. The "Site Investigation Sample Results Notification" form (Form 4400-249) may be used for this purpose. This form can be found at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf>.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (608) 261-5404 or by email at Gena.Larson@Wisconsin.gov.

Sincerely,



Gena Larson, P.G.
Hydrogeologist
Remediation & Redevelopment Program

cc: Rob Hoverman, EnviroForensics, N16 W233390 Stone Ridge Drive, Suite G, Waukesha, WI 53188 (electronic)