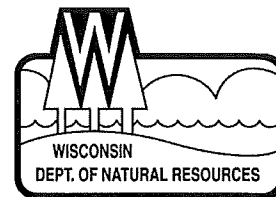


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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November 15, 2019
Mr. Ronald Collison
2140 N 93rd Street
Wauwatosa, Wisconsin 53226

Subject: Review of *Remedial Action Evaluation and Design Report*
Vogue Cleaners
1416 N. 4th Street Milwaukee, Wisconsin 53212
BRRTS# 02-41-559223; FID # 241279170

Dear Mr. Collison:

On April 12, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Remedial Action Evaluation and Design Report* dated April 10, 2019 (Report). The DNR paused the review and requested additional information on June 13, 2019. To date, the DNR has not yet received the requested information. The Report was prepared on your behalf by your consultant, EnviroForensics Inc. (EnviroForensics). A technical assistance fee was submitted for DNR review of the Report and a written response. Additional site investigation is needed before the DNR can approve the remedial action plan.

Background

The DNR was notified of contamination at Vogue Cleaners, a former dry-cleaner that operated from approximately 1951 to 2005, as the result of a site assessment at the site identified above (Site). The suspected source of contamination comprises the eastern portion of the Site associated with former underground storage tanks (USTs). The USTs contained Stoddard and chlorinated solvents used in the dry-cleaning operations. Site investigation activities to-date include the analysis of soil samples for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs); the analysis of groundwater for VOCs and PAHs; the analysis of sub-slab vapor for VOCs.

Results of laboratory analysis in soil samples identified select chlorinated VOCs and PAHs above soil to groundwater residual contaminant levels (RCLs), non-industrial direct contact RCLs, and industrial direct contact RCLs. Results of laboratory analysis in groundwater samples identified select chlorinated VOCs and PAHs above preventive action levels (PALs) and enforcement standards (ESs). Results of the laboratory analysis of vapor samples identified trichloroethene above the indoor air vapor action level (VAL) for small commercial buildings.

Completion of the Site Investigation

Wis. Admin. Code § NR 716.07 Site investigation scoping.
Wis. Admin. Code § NR 716.09 Site investigation work plan.
Wis. Admin. Code § NR 716.07(2) Knowledge of type of contamination.
Wis. Admin. Code § NR 716.11(3)(a) Determine the degree and extent of contamination in all affected media.
Wis. Admin. Code § NR 716.15(4)(c) Isoconcentration map depicting hazardous substances in all affected media.
Wis. Admin. Code § NR 716.15(4)(d) Cross section through source areas depicting the vertical extent of contamination in all affected media.

The DNR has reviewed the Report and based on the information provided and determined that additional site investigation information is required prior to approval of the remedial action plan. The DNR provides the following comments.

1. History of the Site, Previous Discharges, and Contaminant Use

This Site has been occupied by a dry-cleaning facility since approximately 1951. Information previously provided for this facility indicates a discharge of hazardous substances from dry-cleaning operations. The use of PFAS has been associated with dry-cleaning operations both nationally and in Wisconsin, thus, this site may be a source of PFAS contamination. Site investigation scoping (Wis. Admin. Code § NR 716.07) and the site investigation work plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges of hazardous substances.

The DNR has the authority under the Wis. Admin. Code NR 700 series to require the evaluation of PFAS at this site. The DNR is directing you, according to Wis. Admin. Code § NR 716.09, for the site investigation work plan to include an assessment of PFAS. In addition, per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated.

As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, the work plan should include a written evaluation of potential PFAS compounds that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were utilized in any process services, the duration of PFAS use, the type of PFAS utilized, and any areas of the site where PFAS may have been used, stored, or discarded. The site investigation work plan must include a groundwater sampling program for evaluating PFAS compounds at the site.

2. Definition of Degree and Extent

- A. Due to the use of Stoddard solvents at the Site, clarify whether n-nonane has been evaluated during the site investigation. If not, the DNR requests an evaluation of n-nonane.
- B. Discuss whether samples were taken near the tetrachloroethylene (PCE) dry-cleaning machine along the north wall. If samples have been collected in this area, include them on the appropriate soil and groundwater figures, and add the data to the data tables. Additional sampling may be needed to define the degree and extent of contamination at the Site.
- C. PAHs were noted above applicable standards in soil and groundwater at the site. Discuss whether fill material at the Site may be a contributing source of PAH contamination.
- D. The Report states that the City of Milwaukee would not allow access to sample in the adjacent alley to define the degree and extent of contamination. Provide documentation that access to the alley has been denied.
- E. If a Phase I Environmental Site Assessment exists for the site, the DNR requests a copy of this document. The Phase I should be used to determine contaminant source locations and potential recognized environmental condition (RECs).

3. Visual Aids

- A. The Report states that soil samples were collected on the adjacent property to the north, 1422 N. 4th Street. If these samples are being used to define degree and extent of contamination, include them in the applicable figures and tables.
- B. Vapor sampling data was included in the Report; however, the locations of vapor samples were not included. Provide a map depicting the locations and concentrations of vapor samples taken at the Site.
- C. Provide isoconcentration maps for each affected media. These isoconcentration maps should be used to identify source areas and affected areas for remedial action at the Site.
- D. Identify sources and source areas on applicable figures.
- E. Provide a cross section figure that includes the source areas depicting the vertical extent of contamination in applicable affected media at the Site.

Remedial Action Plan

Wis. Admin. Code § NR 722.07(3) Identification and evaluation of remedial action options.

Wis. Admin. Code § NR 722.09(2)(a) Contaminated soils shall be restored in compliance with ch. NR 720.

Wis. Admin. Code § NR 720.05(1)(a) Implement a remedial action addressing soil contamination after completion of a site investigation report in accordance with ch. NR 716.

The Report included remedial action evaluations and a remedial action plan. The Report states that the selected remedial actions include building demolition, excavation and disposal of contaminated soils, and the installation of an engineering control in the form of soil cover. The DNR has reviewed the remedial action plan and provides the following comments:

1. The DNR understand that the City of Milwaukee issued a raze order for the building at the Site. You contacted the DNR on September 20, 2019 and requested input on the applicability of demolishing the building and addressing contamination after the building has been razed. The DNR's Remediation and Redevelopment Program does not regulate demolition plans. Regarding the planned building demolition as a remedial action, further information is needed to explain that the action can be implemented in a manner that will not pose a significant risk of harm to human health, safety, welfare, or the environment. Describe the manner in which the identified contamination at the site will be addressed and contained during building demolition activities. Removing the building has the potential to expose the identified contamination, making the Site less protective than the current condition. Information regarding handling waste from demolished structures is available on-line from the DNR's Waste & Material Management Program.
2. Soil contamination is known to extend west beyond SB-15 at the Site. Consider expanding the excavation footprint to excavate and dispose soil beyond SB-15.
3. Consider expanding the number of confirmation samples taken post excavation to represent the degree and extent of material removed and to determine the residual contamination left at the Site.

4. The Report states that a soil cover engineering control will be installed at the Site post excavation, however, the Report also states that the soil cover will be comprised of a 4-inch thick asphalt pavement. Clarify if the engineering control will be a soil, asphalt cover, or a combination of both and identify the locations of each type of cover material.

Schedule

The DNR has reviewed the Report for compliance with Wis. Admin. Code chs. NR 716, NR 720, and NR 722. The DNR has determined that additional site investigation and remedial action information is needed prior to approving the remedial action plan.

The DNR is requesting the submittal of a site investigation work plan to incorporate PFAS sampling and address the above comments within **60 days** of the date of this letter, by January 15, 2020. The DNR recommends that the site investigation work plan be submitted with a review fee for DNR review and response. Once the site investigation work plan is approved, site investigation activities shall initiate within 60 days after DNR approval. A supplemental site investigation report should then be submitted for review by the DNR. Remedial actions will be reconsidered after completion of the site investigation.

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) 263-8519 or by email at issac.ross@wisconsin.gov.

Sincerely,



Issac Ross
Project Manager – Hydrogeologist Adv.
Remediation & Redevelopment Program

cc: Rob Hoverman, Enviroforensics, Inc. (electronic)