

**From:** Schultz, Josie M - DNR  
**Sent:** Thursday, July 8, 2021 4:03 PM  
**To:** Lynn Bradley  
**Cc:** vandeurzent@gmail.com; Brian Youngwirth  
**Subject:** Additional Site Investigation - Van Deurzen Cleaners 02-05-561974

Lynn,

Thank you for discussing the Van Deurzen Cleaners site with me this afternoon. As mentioned on the phone, I have summarized DNR's recommendations for additional investigation and documentation below. Please keep in mind that site investigations are iterative, and these recommendations are based on DNR's non-fee review of information provided to us to date. Depending upon results of the sampling, it may be necessary to expand the investigation.

DNR's focus is on the risk to receptors in neighboring homes, and this vapor work should be prioritized.

**Vapor:**

- Prior to any sampling, the location(s) of the existing or proposed vapor port(s), indoor air (IA) locations needs to be communicated to DNR in a workplan per Wis. Admin. Code s. NR 716.09.
- On-Site Vapor
  - What's needed:
    - Sample IA (8-hr) / OA (8 or 24-hr) at the source as part of commissioning the vapor mitigation system (VMS) and based on historical use as dry cleaner.
    - An updated Interim Action Report containing items listed in Wis. Admin. Code NR 708.15(3) needs to be submitted, which includes the following:
      - **Separate** Operation, Maintenance and Monitoring (OM&M) plan referencing Wis Admin Code NR 724.13(2)(k):
        - *For vapor mitigation systems; a diagram and photographs showing piping, venting, fans and manometer locations, vent height and location, a description of how to verify that the vapor mitigation system is operating properly, identification of prohibited activities to ensure the continued effectiveness of the vapor mitigation system, and direction to notify the department before any action is taken which would disturb operation of the vapor mitigation system.*
    - Site-specific inspection log
    - Documentation of commissioning, to include pressure field extension testing
- Off-site Vapor
  - 107 S Ontario residence (to southwest of on-site building)
    - What's needed:
      - Resample SSV (30-min) with paired IA (24-hr)
      - A minimum of two paired events is needed with at least one event being during the heating season. DNR *recommends* this sampling be paired with outdoor air (OA) to confirm the source of any detects are not related to exterior sources.

- 1018 George St & 112 S. Winnebago St (two residences east of the source property)
  - What's needed:
    - Sample SSV/IA/OA for a minimum of two events as they are within the screening distance of soil contaminated with chlorinated volatile organic compounds (CVOCs) as discussed in RR-800.
    - Perform at least one event during the heating season.
    - Assessment of the sewer lateral to residences from the main may be appropriate based on results of the sewer investigation (see below).
- Unoccupied, detached garages do not need to be assessed
- Preferential Pathways
  - Sanitary sewer manhole that was sampled is upgradient of the lateral. Need to sample cleanout and a downgradient manhole
  - Reference DNR Guidance: <https://dnr.wi.gov/files/PDF/pubs/rr/RR649.pdf>

**Groundwater:**

- Additional GW delineation needed:
  - Additional delineation around TW-9. In the area of TW-9 and MW-5, there appears to be a disconnect based on concentrations, and consultant should look into this discrepancy. Needs explanation.
  - Vertical delineation is needed, no piezometers are present.
  - Need to assess if the sanitary backfill in the alley is acting as a preferential pathway. Assess whether the area around TW-6 is fully delineated.
  - Ensure that wells are properly surveyed per NR 716.

**Soil:**

- Additional soil delineation needed:
  - In direct contact interval of TW-9 location
  - Horizontally surrounding the TW-9 location
  - Soil surrounding the utilities in the alley

A site investigation workplan needs to be submitted by **September 10, 2021**. As mentioned on the call, I highly recommend that the workplan be submitted with appropriate (\$700) fee if you would like DNR feedback in writing.

Please feel free to call me to further discuss any of the work that is outlined above.

Thank you,  
Josie

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

**Josie M. Schultz**

Hydrogeologist – Northeast Region Remediation and Redevelopment Team  
 Wisconsin Department of Natural Resources  
 2984 Shawano Avenue, Green Bay, WI 54313-6727  
 Cell Phone: 920-366-5685  
 Josie.Schultz@Wisconsin.gov

