



May 15, 2015

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

SUBJECT: Review of Site Investigation Work Plan, dated February 11, 2015
Vogue Cleaners (FMR), 2578 N Wauwatosa Avenue, Wauwatosa, WI
WDNR BRRTS Activity #: 02-41-562047
FID #: 241920690

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 (FMR) site at 2578 N Wauwatosa Avenue, Wauwatosa, WI. The Work Plan stated that soil and groundwater contaminated with Chlorinated Volatile Organic Compounds (CVOCs) 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 proposed to discontinue Polycyclic Aromatic Hydrocarbons (PAHs) as constituents of concern at this site.
 - a. Considering PAH levels above Enforcement Standard (ES) were present in several temporary groundwater monitoring well locations, the Department recommends postponing this decision until results of quarterly groundwater monitoring from the proposed permanent well network can be evaluated.
- 2) The Work Plan proposes to advance nine (9) direct-push soil borings to assess soil impacts.
 - a. The Department concurs with the proposed direct push soil boring activities.
- 3) The Work Plan proposes to advance three (3) deep borings and convert each to a permanent piezometer to determine the vertical extent of contamination.
 - a. The Department concurs with the proposal for the installation of three piezometers to assess vertical extent of contamination.
- 4) The Work Plan proposes to install six (6) permanent monitoring wells to determine groundwater flow direction and seasonal variations of groundwater concentrations.
 - a. The Department concurs with the proposal to install six (6) permanent groundwater monitoring wells to determine groundwater flow direction and contaminant concentration trends.
 - b. In addition to sampling for the proposed contaminants (Volatile Organic Compounds (VOCs) and PAHs), sampling for natural attenuation parameters should be considered.

- 5) The Work Plan proposes to advance two (2) direct-push borings near the on-site sanitary sewer line for the purpose of collecting soil gas samples.
 - a. The Department concurs with the proposed plan to advance two (2) direct-push borings near the on-site sanitary sewer line to assess the potential for vapor migration.
- 6) The Work Plan proposes to conduct a Vapor Intrusion (VI) assessment at five (5) neighboring properties during the likely worst case scenario to determine if the vapor intrusion is a pathway of concern.
 - a. The Department concurs with the proposed VI assessment.

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

- 7) The work proposed is considered to be an appropriate next 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.
- 8) It is assumed all site work will be coordinated with the City of Wauwatosa to eliminate the potential for duplication of efforts and to accommodate changing site conditions. (e.g. demolition of the building located on-site)
- 9) In the future, providing a summary of existing site data (laboratory data tables, isoconcentration maps, geologic cross-sections, and groundwater elevation contour maps) can help facilitate the review of proposed work.
- 10) As long as the site remains open you must continue to submit NR700 semi-annual progress reports.
- 11) 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)