



## Rationale for No Action Required

**Date:** November 10, 2015

**Date stamped:** Original Notification dated July 21, 2015

**Name and description of site:** Pinecrest Shopping Center, 156-248 (180 S. Pine St.), Burlington, WI

**Who is submitting and for whom?** Tom Campbell, Partner Engineering and Science, Inc., 2154 Torrance Blvd, Suite 200, Torrance, CA 90501 [tcampbell@partneresi.com](mailto:tcampbell@partneresi.com) submitted a Technical Assistance and Environmental Liability clarification Request for No Further Action determination. The request was submitted on behalf of Abeer Ghazaleh, C-III Asset Management LLC, 5221 N Oconnor Blvd, Irving, TX 75039  
The Dept. notified Mr. Campbell that we could not issue a NAR (or NFA) and would require additional investigation to determine the significance of identified impacts. Mr. Campbell subsequently submitted a release notification dated July 21, 2015 on behalf of NAI MLG Commercial, Marjorie Horvat (Receiver), 757 N. Broadway St., Suite 700, Milwaukee, WI 53202

**What has been submitted?** Request for No Further Action; Release Notification; Phase II Subsurface Investigation Report, Pinecrest Shopping Center dated June 3, 2015; Phase II Subsurface Investigation Report Addendum, Pinecrest Shopping Center; well abandonment forms on 11/10/15  
The Department issued an RP letter to Marjorie Horvat, NAI MLG Commercial on August 17, 2015.

**Description of contamination:** The subject property is developed with a strip mall and grocery store. The grocery store is located on a parcel identified as 156 S. Pine St., the strip mall on a parcel with the address of 180 S. Pine St. A Phase II investigation was conducted on the property in December 2014 to evaluate potential environmental impact from three recognized environmental concerns related to a dry cleaner store located in the mall at 180 S. Pine, a former 1,000-gallon fuel oil underground storage tank located on the south side of the grocery store at 156 S. Pine and the historic presence of a gasoline service station on the western side of the 180 S. Pine St. parcel. The State's UST database lists the tank as having been removed in 2000 and a geophysical survey conducted in the area did not detect any evidence of a buried tank. No documentation related to the status of an underground storage system associated with the former gasoline service station is available although the property owner indicated that the tanks had been removed.

The Phase II investigation consisted of the advancement of 8 soil borings in the three areas being investigated and collection of 8 soil and 8 groundwater samples for volatile organic compounds (VOCs) and polyaromatic hydrocarbons (PAHs). Three soil samples were collected and sampled in the area of the dry cleaner store and analyzed for VOCs. No VOCs were detected in the soil samples other than methylene chloride which is assumed to be a laboratory contaminant. Low level concentrations of the dry cleaning solvent tetrachloroethylene were detected in groundwater collected from temporary wells in this location. The observed concentrations are consistent with contaminant levels identified during the full scale investigation of this release. The dry cleaner release (BRRTS#02-52-472623) was investigated and remediated and closed on September 14, 2015.

Low level PAHs were detected in each of the 4 samples collected at the location of the former gas station and the one sample collected in the area of the former 1,000 gallon UST. Sample collection depth at the former gas station area was 10-11 feet and 5-6 feet at the 1,000 gal UST. Groundwater samples collected from temporary

wells installed in the boreholes detected low level benzene (estimated value) and PCE above the ch. 140 Wis. Adm. Code groundwater preventive action limit (PAL) at the 1000 gal UST location and benzene was detected above the PAL in one well at the former gas station location. PAHs were detected above PALs in three of the four samples collected at the former service station location.

In February 2014, 4-NR 141 Wis. Adm. Code-compliant monitoring wells were installed, 1 at the former 1000 gal tank location and 3 at the service station location. These wells were sampled on two occasions. Low level PAHs were detected in the first round. No VOCs or PAHs were detected above laboratory quantitative detection limits in any of the samples collected during the second round of sampling.

In July, 2015, Tom Campbell submitted the results of the Phase II investigations and a request to the Department for a No Further Action determination. The Department requested additional investigation in the former gas station area to determine the significance of the PAH contaminated soil detected at depth from boring B-5 during the Phase II investigation. In August 2015, 5 additional soil borings were advanced and sampled for PAH analysis in the vicinity of B-5. One sample was collected above the depth of the B-5 sample, four were collected at a similar depth surrounding B-5. Very low level PAHs were detected in the four borings surrounding B-5, the majority being reported as estimated values below the laboratory limit of quantitation. The shallower sample collected above the depth of B-5 had no reported PAHs above the limit of quantitation.

Summary: low level PAHs were detected below a depth of 4 feet at the approximate depth of the water table at the location the former 1,000 gallon UST. The former tank has been removed, no groundwater impacts were identified. The low level PAH contamination at 5-6 feet is assumed to be related to the former fuel oil tank and considered to be insignificant.

The PAH contamination identified at the location of the former gasoline service station was detected at a depth of 10-11 feet and vertical and horizontal samples collected to establish the extent and degree of this contamination indicate that the PAH contamination is insignificant.

**What is being requested?** No Action Required

**Conclusions:** Grant No Action Required  
Rescind RP letter

**BRRTS #09-52564113 FID#252202170**

Signed: *Nancy Ryan* Date: 11/10/15