



March 15, 2021

Don Scherf
Scherf Properties Trust II
1700 Howlett Lane
Waukesha, Wisconsin 53186

Subject: Review of *Report of Additional Site Investigation Activities*
Krystal Kleeners – 145 E. Sunset Drive, Waukesha, WI
DNR BRRTS #: 02-68-576741; DNR FID #:268280430

Dear Mr. Scherf:

On January 15, 2021, the Wisconsin Department of Natural Resources (DNR) received *Report of Additional Site Investigation Activities*, dated January 13, 2021 (Report). The Report was prepared on your behalf by Endpoint Solutions Corp. and was prepared in response to the DNR letter *Closure Not Recommended*, dated January 3, 2020. The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716. The DNR has determined that additional actions and/or information is required to complete the site investigation. The DNR requests that you submit a supplemental site investigation report which details the activities requested below.

Background & Report Summary

The strip mall on 131 East Sunset Drive has been used for mixed commercial purposes including a restaurant, tanning salon, and a dry cleaner. Dry-cleaning operations occurred within the strip mall, at 145 E. Sunset Drive, from approximately 1991 to 2018. On February 2, 2016, the DNR was notified that Chlorinated volatile organic compounds (CVOCs) were present in soil, groundwater, and vapor at the site as a result of the former dry-cleaning operations. A sub-slab depressurization system (SSDS) was installed in February 2017 to mitigate the potential risk of vapor intrusion at the site.

The Report was prepared in response to the DNR letter *Closure Not Recommended*, dated January 3, 2020. The Report contains the results of additional soil, groundwater, sub-slab vapor, and indoor air sampling. Additionally, sub-slab differential pressure measurements were collected to assess whether the SSDS is operating adequately.

DNR Comments

The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716. The DNR has determined that additional actions and/or information is required to complete the site investigation. The DNR requests that you submit a supplemental site investigation report which details the activities requested below.

Degree and extent of contamination in all affected media

Wis. Admin. Code §§ NR 716.11 (3), NR 716.11 (5) require the field investigation to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.

- The newly installed monitoring well, MW-6, was sampled once and contains the highest concentrations of CVOCs in groundwater identified at the site to date. Additional groundwater sampling is necessary to confirm the results at MW-6, complete the site investigation, and determine the stability of the contaminant plume. Conduct additional groundwater sampling events at MW-1, MW-3, MW-4, and MW-6. Additionally, collect groundwater elevation measurements from all wells to better define the predominant groundwater flow direction at the site. The need for additional monitoring wells should be assessed based on the results of the additional groundwater sampling and flow direction determination.
- Conduct additional indoor air sampling to confirm the indoor air results within each of the 141, 143, 145, and 147 E. Sunset Dr. tenant spaces. The sampling should be conducted in the heating season and in accordance with best management practices including an 8-hour sample duration during normal business hours and the collection of an outdoor ambient air sample.
- The previous sub-slab vapor sampling results indicate that the entire 143 and 145 tenant spaces require vapor mitigation. The sub-slab differential pressure measurements collected to date indicate that the floor slabs of the 143 and 145 tenant spaces are not adequately depressurized. Collect additional sub-slab differential pressure measurements from all vapor pin locations to demonstrate the SSDS is operating effectively. Modifications to the SSDS may be necessary depending on the results of the indoor air sampling and sub-slab differential pressure measurements.
- Provide an evaluation of the potential for PFAS or other emerging contaminants to be present in environmental media at the site. The evaluation should include whether PFAS or other contaminants were used or stored at the site based on the site history, duration of use, etc. Based on this evaluation, make a determination whether emerging contaminants sampling is necessary at the site. More details about the emerging contaminants scoping evaluation can be found in the DNR letter “Reminder to Include Evaluation of Emerging Contaminants in Site Investigation,” dated 8/17/2020. The emerging contaminants evaluation and determination may be submitted prior to conducting the activities requested below.

Schedule

Within 60 days of the date of this letter, submit a work plan in accordance with Wis. Admin. Code ch. NR 716 describing how you will accomplish the work necessary to complete the site investigation. Submit a supplemental site investigation report in accordance with Wis. Admin. Code ch. NR 716 within 60 days after completion of the additional field investigation.

We appreciate your efforts to restore the environment at this site. If you have any questions concerning the site or this letter, please contact the project manager, Joseph Martinez, at (414) 218-6042, or by email at joseph.martinez@wisconsin.gov.

Sincerely,



Joseph J. Martinez
Hydrogeologist – Southeast Region
Remediation and Redevelopment Program

cc: Bob Cigale – Endpoint Solutions Corp.