

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Waukesha Service Center
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Waukesha, WI 53188

Scott Walker, Governor
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November 12, 2018

Phillips Edison & Company
Attn: Tom Meyers
11501 Northlake Drive
Cincinnati, OH 45249

Subject: Remedial Action Options and Design Report Review for Greentree Centre, 5131 Douglas Ave., Racine, WI BRRTS: 02-52-579863 FID: 252138700

Dear Mr. Meyers:

On July 5, 2018 the Department of Natural Resources (the Department) sent you a letter requesting additional information in order to adequately review the proposed remedial actions at the Greentree Centre property. The Department received the additional information on August 1, 2018.

The additional information provided in the resubmittal details how your consultant will address the sub-slab vapor concerns that have been identified beneath the building.

At this time, the Department is approving the proposed remedial action of the installation of the Vapor Extraction System to mitigate vapor intrusion from beneath the building as well as continuing the quarterly groundwater monitoring.

Be aware that the following information will need to be submitted to the Department in a future document.

1. Provide the justification as to why your consultant can't collect soil samples in the area of high sub-slab vapors in the dc space. They say no indications of subsurface utilities were identified beneath the floor slab during a GPR survey, and the previous consultant was able to collect a soil sample near the dry cleaning machine. This should be one of the locations for the confirmation sampling after the system is shut down.
2. The consultant states in section 4.1 Installation of Vapor Extraction System (paragraph 4 after #5.) that "in additional to the soil gas samples, Apex proposes to collect and analyze soil samples from the same three locations." This would be post-operation. What three locations? There was no map included to indicate these locations for samples and will three samples be sufficient to show that the system was effective? Please plan for a sufficient number of soil and sub-slab vapor samples to clearly show the system was effective in reducing the vapor intrusion concern.
3. The consultant did not provide a map showing the locations of the utilities as requested in the July 5, 2018 letter from the Department. There is a map showing locations of utilities in the Hygienetics Environmental Services, Inc. Limited Phase II Subsurface Soil Screening Investigation dated April 19, 2005. Please review this map and include the location for utilities and include any changes that may have occurred since 2005.
4. The consultant proposes to conduct post-operation (after 2 years) soil-gas sampling, and state that they will determine the need for continued operation of the VES and/or additional verification sampling of soil gas or soil. Please following the framework for addressing vapor intrusion that is available in guidance documents RR-800 and RR-042.

Please proceed with the work as proposed and incorporate the above comments in future submittals to address the Department's concerns. As your consultant indicates the system may be adjusted as necessary after initial installation. Quarterly groundwater monitoring will need to continue until a stable or decreasing groundwater plume has been established. Groundwater monitoring and groundwater elevations should continue during the operation of the Soil Vapor Extraction System.

Be sure to keep the Department notified of any changes or issues that may arise during installation or the running of the system.

Feel free to contact me if you have any questions at shanna.laubeanderson@wisconsin.gov or by phone at 262-574-2142.

Sincerely,



Shanna L. Laube-Anderson

Project Manager

Southeast Region, Waukesha Service Center

Cc: Steve Newlin, Apex Companies, LLC, 300 South Wacker Dr., Suite 630, Chicago, IL 60606