



April 23, 2021

Schawanda Grissom
Phillips Edison & company
11501 Northlake Drive
Cincinnati, OH 45249

Subject: Case Closure under Wis. Admin. Code ch. NR 726 Not Recommended
Greentree Cleaners, 5111 Douglas Ave., Racine, Wisconsin
DNR BRRTS Activity # 02-52-579863
FID #: 252138700

Dear Schawanda Grissom:

On October 29, 2020, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. As you are aware, the DNR reviews environmental remediation cases for compliance with applicable laws, including Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 – 754 and whether any further threat to public health, safety or welfare or the environment exists at the site or facility, per Wis. Admin. Code § NR 726.13 (2) (b). As discussed with your consultant on March 24, 2021 and then with you on April 7, 2021, case closure is not recommended because additional legal requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure. We request that within 60 days of this letter, you provide us with the information requested or your written response regarding the necessary work and a schedule for completion of this work.

Additional Requirements Needed for Case Closure Under Wis. Admin. Code ch. NR 726

As noted above, additional work is necessary to meet the requirements for case closure because the vapor pathway, including preferential pathway impacts, has not been fully defined to determine what vapor mitigation, if any, is needed.. Additional vapor sampling is needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11. More information and evaluation is required to support your consultant's conclusions that no additional soil or groundwater investigation is required, and to demonstrate how site conditions meet the closure criteria in Wis. Admin. Code §§ NR 726.05(6), (7) and (8), and to correctly identify continuing obligations that will be required based on site conditions, per Wis. Admin. Code §§ NR 722.09(5) and as detailed in § NR 726.15.

Vapor pathway. Additional site investigation, per Wis. Admin. Code § NR 716.11 (5), is needed to determine whether vapor intrusion is a completed pathway at this site, and if there is a risk of future vapor exposure due to residual contamination.

1. To support the consultant's conclusion that the vapor mitigation system remediated the vapor concern from beneath the building, and continued use or extension of a vapor mitigation system should not be

- required under Wis. Admin. Code § NR 726.15(2)(h), two rounds of vapor samples, one collected during the heating season and one collected during the cooling season, need to be collected from all previous vapor sample locations, except that only one sampling location is needed in the chemical storage area. Additional vapor sampling points may be required based on the results from these samples.
2. Evaluate the utilities below the building to establish if they are providing a vapor conduit to other portions of the building. Floor drains in the restroom(s) or kitchens, in the drycleaner space and in adjoining businesses were not discussed as potential discharge areas or pathways for vapor movement to other indoor air spaces. The vapor contamination found in SV-11 indicates a possible impact from a preferential pathway such as a utility line. Provide a diagram of all the utilities within the building, as a whole, to include all the adjacent businesses. Particular attention should be paid to the water main and sanitary sewer. Include the estimated areas of soil, groundwater and vapor contamination to support the utility pathway evaluation. Propose additional vapor sampling points required to investigate these pathways, based on this evaluation.
 3. Provide information on building foundations. Determine if the foundations (footwall, knee-wall, or other sub-surface support structures) are impeding or otherwise influencing the migration of the vapors.
 4. Based on vapor sampling results:
 - a. evaluate whether any additional vapor sampling is required to determine the potential for vapor impacts beneath the building to the north of the strip mall (identified as “K Mart building”).
 - b. Evaluate whether indoor air samples should be collected in any building space within the shopping center as part of the vapor intrusion investigation. Identify the use of all building spaces within the shopping center for this evaluation.
 5. The need for continued use of a vapor mitigation system should be evaluated after completion of the vapor investigation. If vapor mitigation is required, the system should be evaluated to ascertain the effectiveness and area of influence through a commissioning process that may require more than one seasonal assessment depending on the initial results.
 6. If vapor mitigation is needed to address sub-slab vapor concentrations and prevent vapor intrusion at this site, source control actions are required to be taken under Wis. Admin. Code § NR 726.05 (8).
 7. Based on the vapor investigation results, determine whether a continuing obligation is needed to limit property use to commercial (non-residential) uses, as described in Wis. Admin. Code § NR 726.15(2)(k).
 8. Based on the identified soil and groundwater contamination at the site, add a continuing obligation for a future vapor risk, in accordance with Wis. Admin. Code § NR 726.15(L).

Soil

9. The sources for soil, groundwater and vapor contamination have not been fully described. Identify all possible routes/sources of discharge to include floor drains, utilities, outdoor storage, and indoor storage. Once all possible sources are identified, determine if sampling is adequate to confirm sources of contamination and define the degree and extent of the contamination. For example, soil samples have not been collected in the area identified as “chemical storage”. Explain how additional soil samples are not needed in the dry cleaner plant area or other potential source areas. The hand auger samples collected after system shut down were located several feet from the dry cleaner machine, and previous samples in the initial soil borings around the dry cleaner plant identified soil contamination at 3-5 feet. Vapor sample results cannot be used to determine the extent of soil contamination, or assume a lack of soil contamination, especially in potential source areas.
10. There are not sufficient soil samples to accurately estimate the extent of soil contamination laterally or vertically beneath the building. Limited access within the building has been provided as a reason for not

collecting additional soil samples. If this is the case, a structural impediment continuing obligation should be included in the closure packet, with accompanying required documentation.

11. In the absence of sufficient soil samples to accurately delineate the soil contamination, Figures B.2.a. and B.2.b. should depict a continuous area of soil contamination between the dry cleaner plant area and the larger soil contamination area depicted to the east. Cross sections (Figures B.3.a) should similarly depict a broader and deeper area of estimated soil contamination.
12. Cross sections should include all utilities, soil results and depth of collection, any potential impediments such as footings and/or foundation walls and water table. Current cross sections do not include any of these items from within the building.

Groundwater

13. All groundwater data should be evaluated to determine if the closure criteria in Wis. Admin. Code § NR 726.05 (6) for groundwater exceeding the enforcement standard at case closure have been met. Particular attention should be given to explaining the results in MW-2, where vinyl chloride levels have increased since the initial sampling event.
14. Based on the data from MW-2, the estimated Enforcement Standard iso-contour line in Figure B.3.b should be extended to the northern property line. Additionally, as no monitoring well has been placed inside the building due to access limitations, while potential source areas exist beneath the building, the estimated Enforcement Standard iso-contour line in Figure B.3.b should extend to the west of MW-1 beneath the building at least to the dry cleaning machine area.

Other documentation comments

15. Provide the correct Certified Survey Map for the property that shows that your company now owns this parcel.
16. Provide the correct deed that only includes the parcel that is identified under this BRRTS number. The deed included appears to include all the parcels that your company originally purchased but now have sold to other parties.
17. The address listed with the County of Racine for this parcel is 5111 Douglas Ave. Please use that address as the address for this parcel from this point forward. The address has been corrected in our database.
18. A DNR letter sent to all responsible parties on August 17, 2020 required evaluation of emerging contaminants when scoping the site investigation. The limited information provided in the closure form is not adequate for this purpose. Specific to this site, explain whether and to what extent water-proofing was done at this location or whether dry cleaning of water-proofed garments would have contributed PFAS contaminants to site discharges.

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements.

- Supplemental SI workplan within 60 days (NR 716.09 (1)).
- Beginning of additional work within 90 days of approval of workplan (NR 716.11 (2g)).
- Supplemental SIR within 60 days of completion of work (NR 716.15 (1)).
- Evaluation of needed remedial actions and/or mitigation (NR 708, 722 and 726).
- Revised case closure submittal (NR 726).

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Case closure can be reconsidered by the DNR once documentation has been received.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact the DNR project manager, Shanna L. Laube-Anderson at 262-758-0015 or via email at shanna.laubeanderson@wisconsin.gov. For more information on the closure reconsideration process, please see DNR publication, RR-102, “Wis. Admin. Code ch. NR 726 Case Closure Reconsideration Process” by visiting dnr.wi.gov, search: RR-102, for more information.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



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