



# Additional Site Investigation Work Plan

for

Greentree Cleaners  
5111 Douglas Avenue  
Racine, Racine County, Wisconsin

DNR FID # 252138700  
DNR BRRTS #02-52-579863

June 28, 2021

Apex Project No. PECO\_2017-100

Prepared for:

Phillips Edison & Company  
11501 Northlake Drive  
Cincinnati, Ohio 45249



June 28, 2021

Ms. Shanna Laube-Anderson  
State of Wisconsin  
Department of Natural Resources  
Southeast Region Headquarters  
2300 N. Dr. Martin Luther King, Jr. Drive  
Milwaukee, Wisconsin 53212-3128

Re: Work Plan for Additional Site Investigation  
Greentree Cleaners  
5111 Douglass Avenue, Racine, Wisconsin  
Wisconsin DNR Facility Identification # 252138700  
Wisconsin DNR BRRTS Activity # 02-52-579863

Dear Ms. Laube-Anderson:

Phillips Edison & Company retained Apex to prepare this Work Plan for additional Site Investigations for the dry cleaner tenant space at 5111 Douglas Avenue in Racine, Wisconsin. This tenant space is located within Greentree Centre, a multi-tenant retail strip mall. Enclosed is Apex's Site Investigation Work Plan to address requirements identified in WDNR's letter dated April 23, 2021.

If you have any questions regarding our findings, please contact Steve Newlin at (847) 956-8589 x3201. Thank you for attention to this matter.

Respectfully Submitted,  
**Apex Companies, LLC**

Handwritten signature of Jane Allan in black ink.

Handwritten signature of Steve Newlin in black ink.

Jane Allan  
Senior Project Manager

Steve Newlin  
Senior Project Manager

cc: Mr. Tom Meyers, Phillips Edison & Company

Attachments

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**ATTACHMENT**

DNR Letter dated April 23, 2021

**ADDITIONAL SITE INVESTIGATION WORK PLAN  
GREENTREE CLEANERS, GREENTREE CENTRE  
5111 DOUGLASS AVENUE  
RACINE, MILWAUKEE COUNTY, WISCONSIN**

## **1.0 BACKGROUND**

Phillips Edison Company (Client) retained Apex Companies, LLC (Apex) to prepare this work plan in association with the dry cleaner tenant space at 5111 Douglas Avenue in Racine, Wisconsin (the Site). In response to a release of chlorinated volatile organic compounds (cVOCs), Apex designed and operated a soil vapor extraction (SVE) system intended to draw the soil-vapor from below the floor slab in the areas of soil-gas exceedances by creating a vacuum field beneath the slab. Operation of the SVE reduced potential vapor intrusion from the sub-slab to indoor air, and reduce soil contamination.

After operation of the SVE system and the resampling of the soil and vapor beneath the floor slab, a Closure Request was submitted to the DNR dated May 2020. As directed by the Wisconsin Department of Natural Resources (DNR), in the attached letter dated April 23, 2021, additional site investigations are required to confirm the SVE system has fully remediated the Site.

## **2.0 RESPONSE TO DNR COMMENTS**

### **Vapor Pathway**

**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**

Two rounds of sub-slab vapor sampling; one during the cooling season and one during the heating season have already been conducted at sample locations SV-2, SV-3 and SV-12. One round of sub-slab vapor sampling has been conducted during the cooling season at SV-4, SV-5, SV-6, SV-7, SV-8, SV-9, SV-10 and SV-11. Apex proposes to collect an additional sub-slab vapor sample from the following locations during the heating season:

SV-4, SV-5, SV-6, SV-7, SV-8, SV-9, SV-10 and SV-11

**Table 1** summarizes the previous and proposed additional sub-slab sampling. SV-1 located in the chemical storage area has already been sampled. **Section 3** below provides more detail on the proposed sub-slab sampling.

**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.***

Apex and our subcontractor performed ground penetrating radar (GPR) surveys within the tenant spaces adjacent to the dry cleaner. Based on the survey, we prepared the attached **Figure 1** with the interpreted utility lines beneath the building floor slab. The lines identified are believed to be sewer and water lines that run generally north and south from one tenant space to the next. It should be noted that SV-7 was already sampled immediately adjacent to the lines running south of the dry-cleaner. However, to further assess the potential vapor migration along these utilities, Apex proposes two new vapor points (SV-13 and SV-14) as shown on **Figure 1**. Section 3 below provides more detail on the sampling of the two new vapor points.

**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.***

No as-built drawings are available to determine if foundations exist between each tenant space. Apex observed above the drop ceiling and found concrete cinder block walls between each tenant space, suggesting that the walls between the tenant spaces are structural walls that would require sub-surface foundations.

**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.***

Apex believes the proposed sub-slab sample detailed in Section 3 below is sufficient to delineate the extent of potential sub-slab vapor associated with the dry-cleaning operations. Results from SV-11 and SV-14 will be sufficient to demonstrate that vapors have not migrated as far as the K Mart building. Should the proposed sample data show otherwise, the need for additional vapor sampling will be evaluated. Apex believes that indoor air sampling in tenant spaces could detect volatiles from various other sources unrelated to the dry-cleaning operations. Therefore, we are not proposing indoor air sampling. Figure 1 shows the use of the adjacent tenant spaces.

- 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.***

Once the proposed additional sampling summarized herein is complete, Apex will evaluate the need for additional vapor mitigation.

- 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).***

Once the proposed additional sampling summarized herein is complete, Apex will evaluate the need for additional vapor mitigation. If mitigation is required, source control actions will be taken to satisfy 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).***

Once the proposed additional sampling summarized herein is complete, Apex will evaluate the need for a property use restriction.

- 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).***

A continuing obligation will be added to address potential future construction in the area of the dry-cleaners, 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.***

The source of the chlorinated solvent impacts is believed to originate from the dry-cleaning machine and handling of the solvent inside the building. Some solvent storage was observed inside the tenant space as illustrated on Figure 1. No storage of solvent outside the building is known or observed by Apex during our work to date.

Apex has identified utilities running beneath the floor slab and intends to investigate whether those utilities have served as a preferential pathway for the migration of the solvent.

Figures B.2.a and B.2.b from our Closure Request will be revised to include a continuous area of soil contamination between the dry cleaner and the larger area depicted to the east. A more detailed description of the identified soil contamination will be provided in a Site Investigation Report (SIR) and the Closure Request.

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.***

A structural impediment continuing obligation will be included in the Closure Request.

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.***

Figures B.2.a and B.2.b from our Closure Request will be revised to include a continuous area of soil between the dry cleaner and the larger area depicted to the east. Cross sections (Figures B.3.a) will be revised to 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.***

Cross sections will be revised to include interpreted utility locations and soil/depths and results.

### **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.***

A more detailed description of the identified groundwater contamination will be provided in a SIR and the Closure Request. Particular attention will be provided to the vinyl chloride detected in monitoring well MW-2.

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.***

Figure B.3.b from the Closure Request will be revised to extend the iso-contour line to the northern property line and west to the dry-cleaning machine.

### 3.0 METHODOLOGY

#### Additional Sub-Slab Sampling/Analysis

As discussed above, Apex will collect 10 soil-gas samples immediately below the concrete floor slab in and adjacent to the former dry cleaner tenant space. The sampling is proposed to be completed during the heating season. One soil-gas sample will be collected from the following locations shown in Figure 1:

SV-4, SV-5, SV-6, SV-7, SV-8, SV-9, SV-10, SV-11 and two new locations SV-13 and SV-14. The two new sample points are proposed to further investigate potential preferential pathway migration along sewer and water lines beneath the floor slab.

The probes will be installed by drilling a small diameter hole (5/8-inch) through the concrete slab into the underlying gravel-aggregate layer, approximately nine inches below the top of the concrete floor. Then a 1-inch diameter hole will be drilled in the same location to approximately ½-inch below the top of the concrete floor for leak testing. The hole will be cleared of any debris prior to installing the soil gas probe. The soil gas probes will consist of a stainless-steel MIP adapter/compression coupling, covered with a silicone tube, which will be inserted and seated firmly into the 5/8-inch diameter hole drilled through the concrete slab.

Prior to sample collection, leak tests will be performed on the sample probes by mechanical means using the larger diameter hole as a water dam. The annulus of the 1-inch hole will be filled with distilled water and monitored for fluctuations prior to and during sampling to verify that a leak has not occurred.

The laboratory-supplied regulator assembly will be attached to the Summa canister and a 3-foot section of 0.25-inch Teflon-lined polyethylene tubing will be attached to the regulator with Swagelock® fittings. A shut-in test will be performed on the sample train by connecting the tubing to a syringe and plunger. With the Summa ® canister valve closed, a vacuum of approximately 20 inches of mercury will be applied to the sample train and maintained for 30 seconds. The pressure will be observed to confirm the pressure gauge remains stable for the duration of the test.



Additionally, the sub-slab gas probes will be purged a minimum of three probe volumes of air from the sampling media to ensure representative samples of sub-slab soil gas and field screened for volatile organic emissions using a PID equipped with a 10.6 eV PID lamp.

Upon successful leak test completion and probe purging/screening, sub-slab soil gas samples will be collected using batch-certified 6-liter Summa® canisters (evacuated stainless steel canisters) with (30-minute) flow control valves with a flow rate of 200 milliliters per minute (mL/min). At each of the soil vapor probe locations, the Summa canister will be connected to the sample probe and the regulator valve will be opened. The initial time and vacuum pressure will be recorded and monitored throughout sample collection. Chain of custody documentation will be maintained throughout the sample handling process. Results of the field screening, purge volumes, leak test observations, sampling intervals, initial and final vacuum pressures and laboratory-supplied equipment identification numbers will be summarized on sub-slab sampling logs.

Soil-slab vapor samples will be analyzed for the target analytes (cVOCs) by EPA Method TO-15. The analysis will be performed by a National Environmental Laboratory Accreditation Conference certified laboratory.

The results of the analysis will be compared to sub-slab Vapor Action Levels (VALs) for small and large commercial property use based on the USEPA VISL with an excess lifetime cancer risk of  $1 \times 10^{-5}$  in accordance with WAC 716.

#### **4.0 SITE INVESTIGATION REPORT (SIR)**

Upon receipt of the analytical results, Apex will prepare and updated SIR that details the field operations and summarizes the laboratory results for the sub-slab vapor, air and soil samples relative to the appropriate standards. The report will incorporate the methodology and results of the previous investigations and the new data generated from the proposed work herein.

**FIGURE**

Figure 1: Vapor Point Sample Locations

KMART  
(5141 DOUGLAS AVE.)



COUSIN'S SUBS  
(5131 DOUGLAS AVE.)

KINGS WOK  
(5131 DOUGLAS AVE.)

SV-11

SV-14

SV-9

VACANT  
(5131 DOUGLAS AVE.)

SV-4

SV-5

SV-8

SV-3

DRY  
CLEANING  
PLANT

SV-2

SV-12

GREENTREE CLEANERS  
(5131 DOUGLAS AVE.)

SV-1

SV-7

CHEMICAL STORAGE

COST CUTTERS FAMILY HAIR SALON  
(5131 DOUGLAS AVE.)

SV-10

SV-6

SV-13

NAIL EXPRESS

DOUGLAS AVENUE  
DINER STORAGE

LEGEND



SUB-SLAB SOIL VAPOR SAMPLE

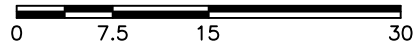


FLOOR DRAIN



PIPING IDENTIFIED WITH RADAR

SCALE IN FEET



CHECK BY	SN
DRAWN BY	OS
DATE	6-24-21
SCALE	AS SHOWN
CAD NO.	PECO.2017.100G
PRJ NO.	PECO_2017-100

SUB-SLAB VAPOR LOCATIONS

GREENTREE CENTRE  
5131 DOUGLAS AVENUE, UNIT D  
RACINE, WISCONSIN



FIGURE

1

**TABLE**

Table 1: Proposed Vapor Sampling

Table 1  
Proposed Sub-Slab Sampling  
Greentree Centre  
Racine, Wisconsin

**Sub-Slab Sampling**

Sample Point	First Sample	Second Sample	Proposed Sampling
SV-2	6/13/2017	1/4/2019	None
SV-3	6/13/2017	1/4/2019	None
SV-4	8/16/2019	6/27/2019	
SV-5	8/16/2019	NA	
SV-6	8/16/2019	NA	
SV-7	8/16/2019	NA	
SV-8	8/16/2019	NA	
SV-9	9/13/2021	NA	
SV-10	9/13/2021	NA	
SV-11	9/13/2021	NA	
SV-12	1/4/2019	6/27/2019	None
SV-13 (new location)	NA	NA	
SV-14 (new location)	NA	NA	
Cooling Season			
Heating Season			

**ATTACHMENT**

DNR Letter dated April 23, 2021



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](mailto: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](http://dnr.wi.gov), search: RR-102, for more information.

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

Sincerely,



Pamela A. Mylotta  
Team Supervisor, Southeast Region  
Remediation & Redevelopment Program  
414-374-2423  
[Pamela.Mylotta@wisconsin.gov](mailto:Pamela.Mylotta@wisconsin.gov)

cc: Steve Newlin, Apex Companies LLC, 300 South Wacker Dr., Chicago, IL 60606 – via email