



December 15, 2022

Mr. 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

Subject: Additional Investigation of Preferential Pathways for Vapor Intrusion
Greentree Cleaners
5111 Douglass Avenue, Racine, Wisconsin
Wisconsin DNR Facility Identification # 252138700
Wisconsin DNR BRRTS Activity # 02-52-579863

Dear Ms. Laube-Anderson:

Greentree Station LLC retained Apex to conduct additional site investigation at the location of the former dry cleaner tenant space at 5111 Douglas Avenue, Unit D. This tenant space is located within Greentree Station LLC's Greentree Centre, a retail strip mall located at 5055 & 5111-5141 Douglas Avenue in Racine, Racine County, Wisconsin.

Additional assessment was requested to satisfy Wis. Admin. Code § NR 716.11(5)(a) which requires that the field investigation includes an evaluation of the potential pathways for migration of the contamination, including utility corridors. In an email dated October 24, 2022, WDNR noted that the previous floor drain sample was collected in front of the p-trap and requested that the confirmation floor drain sample be collected from behind the p-trap if possible, as recommended in DNR document *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors* (RR-649). Alternatively, a sample from a sewer cleanout or nearby manhole would be acceptable, provided the cleanout or manhole is in an appropriate location. In an email dated November 10, 2022, WDNR approved the proposed manhole location selected for sampling.

On November 14, 2022, Apex representative Ravi Pathare mobilized to the Site to collect a sample from the approved manhole location (**Figure 1**). The manhole cover was opened enough to allow for tubing to be lowered to near the bottom of the manhole.

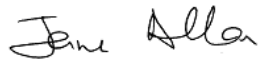
A grab sewer gas sample was collected into an evacuated one-liter Summa[®] canister. The vacuum within the Summa[®] canister vacuum dropped from an initial reading of approximately 28 inches Hg to 0 inches Hg. The summa canister was submitted to Pace Analytical for analysis of site specific volatile organic compounds by TO-15. A copy of the analytical report and chain of custody are provided in **Attachment 1**.

Based on RR-649, the screening levels for sanitary sewer gas within the utility main (SSGSL) are VAL/0.03. **Table 1** provides the sewer gas results with SSGSL based on both commercial and residential VALs. Concentrations of all COCs in the manhole sewer gas sample are below the SSGSL for both residential and small commercial.

In accordance with the flowchart provided as Figure 5 of RR-649, COC concentrations were compared to 10% of SSGSL. Since there are no residences nearby, the commercial SSGSL applies. All detections were below 10% of the commercial SSGSL, therefore, no further investigation of preferential pathways is recommended.

If you have any questions or comments about the proposed work for the Site, please do not hesitate to contact the undersigned at (513) 771-3617, extension 1801.

Sincerely,
Apex Companies, LLC.



Jane Allan, PhD
Senior Project Manager

Table
Figure
Attachment 1 – Laboratory Report

KMART
(5141 DOUGLAS AVE.)

COUSIN'S SUBS
(5131 DOUGLAS AVE.)

KINGS WOK
(5131 DOUGLAS AVE.)

VACANT
(5131 DOUGLAS AVE.)

GREENTREE CLEANERS
(5131 DOUGLAS AVE.)

COST CUTTERS FAMILY HAIR SALON
(5131 DOUGLAS AVE.)

NAIL EXPRESS

DOUGLAS AVENUE DINER
(5121 DOUGLAS AVE.)

DOUGLAS AVENUE
DINER STORAGE

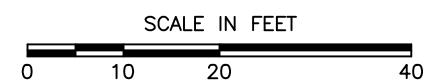
CHEMICAL STORAGE



THERE WAS NO EXCEEDANCES OF ANY
INDOOR AIR VAPOR ACTION LEVELS (VALs)
OR SUB-SLAB VAPOR RISK SCREENING
LEVELS (VRSLs) DURING POST REMEDIATION
SAMPLING CONDUCTED IN 2019 AND 2022

LEGEND

- ◆ SUB-SLAB SOIL VAPOR SAMPLE
- ▲ INDOOR AIR
- FLOOR DRAIN
- BATHROOM FLOOR DRAIN
- PIPING IDENTIFIED WITH RADAR
- SANITARY LINE
- STORMWATER LINE
- AT&T
- AT&T (COPPER LINES)
- SANITARY
- - - SPECTRUM
- - - STORM DRAIN
- WATER SERVICE
- - - WE ENERGY



CHECK BY	JA
DRAWN BY	OS
DATE	12-15-22
SCALE	AS SHOWN
CAD NO.	PECO_2017.10063
PRJ NO.	PECO_2017-100

VAPOR INTRUSION MAP

GREENTREE CENTRE
5131 DOUGLAS AVENUE, UNIT D
RACINE, WISCONSIN



FIGURE

1

Table 1
 Summary Sanitary Soil Gas Data for Volatile Organic Compounds (VOCs)
 Greentree Centre
 5111 Douglas Avenue, Racine, Wisconsin

Analytes	Sanitary Sewer Gas Screening Level (SSGSL)*		MH-111422 Manhole on Chester Lane
	Residential	Small Commercial	
	11/14/2022		
cis-1,2-Dichloroethene	NE	NE	7
trans-1,2-Dichloroethene	1400	5800	<0.68
Tetrachloroethene	1400	5800	5.3
Trichloroethene	70	290	18.7
Vinyl chloride	56	930	<0.16

Notes:

concentrations in micrograms per cubic meter (ug/m3).

SSGSL = VAL/0.03 (RR-649)

< = Not Detected: Concentration less than the indicated laboratory detection limit.

Analytes above SSGSL concentrations are shown in **bold**.

VALs from Vapor Quick Look-Up Table (RR-0136)

NE = Remedial Objective not established.

Attachment 1

Laboratory Analytical Report

November 30, 2022

Jen Makino
Apex Companies - IL
205 West Randolph St
STE 740
Chicago, IL 60606

RE: Project: PECO-2017-100 Racine, WI
Pace Project No.: 40254768

Dear Jen Makino:

Enclosed are the analytical results for sample(s) received by the laboratory on November 15, 2022. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Minneapolis

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Christopher Hyska
christopher.hyska@pacelabs.com
(920)469-2436
Project Manager

Enclosures



REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, LLC.

CERTIFICATIONS

Project: PECO-2017-100 Racine, WI
Pace Project No.: 40254768

Pace Analytical Services, LLC - Minneapolis MN

1700 Elm Street SE, Minneapolis, MN 55414
A2LA Certification #: 2926.01*
1800 Elm Street SE, Minneapolis, MN 55414--Satellite Air Lab
Alabama Certification #: 40770
Alaska Contaminated Sites Certification #: 17-009*
Alaska DW Certification #: MN00064
Arizona Certification #: AZ0014*
Arkansas DW Certification #: MN00064
Arkansas WW Certification #: 88-0680
California Certification #: 2929
Colorado Certification #: MN00064
Connecticut Certification #: PH-0256
EPA Region 8 Tribal Water Systems+Wyoming DW Certification #: via MN 027-053-137
Florida Certification #: E87605*
Georgia Certification #: 959
GMP+ Certification #: GMP050884
Hawaii Certification #: MN00064
Idaho Certification #: MN00064
Illinois Certification #: 200011
Indiana Certification #: C-MN-01
Iowa Certification #: 368
Kansas Certification #: E-10167
Kentucky DW Certification #: 90062
Kentucky WW Certification #: 90062
Louisiana DEQ Certification #: AI-03086*
Louisiana DW Certification #: MN00064
Maine Certification #: MN00064*
Maryland Certification #: 322
Michigan Certification #: 9909
Minnesota Certification #: 027-053-137*
Minnesota Dept of Ag Approval: via MN 027-053-137
Minnesota Petrofund Registration #: 1240*
Mississippi Certification #: MN00064

Missouri Certification #: 10100
Montana Certification #: CERT0092
Nebraska Certification #: NE-OS-18-06
Nevada Certification #: MN00064
New Hampshire Certification #: 2081*
New Jersey Certification #: MN002
New York Certification #: 11647*
North Carolina DW Certification #: 27700
North Carolina WW Certification #: 530
North Dakota Certification (A2LA) #: R-036
North Dakota Certification (MN) #: R-036
Ohio DW Certification #: 41244
Ohio VAP Certification (1700) #: CL101
Ohio VAP Certification (1800) #: CL110*
Oklahoma Certification #: 9507*
Oregon Primary Certification #: MN300001
Oregon Secondary Certification #: MN200001*
Pennsylvania Certification #: 68-00563
Puerto Rico Certification #: MN00064
South Carolina Certification #: 74003001
Tennessee Certification #: TN02818
Texas Certification #: T104704192*
Utah Certification #: MN00064*
Vermont Certification #: VT-027053137
Virginia Certification #: 460163*
Washington Certification #: C486*
West Virginia DEP Certification #: 382
West Virginia DW Certification #: 9952 C
Wisconsin Certification #: 999407970
Wyoming UST Certification #: via A2LA 2926.01
USDA Permit #: P330-19-00208
Please Note: Applicable air certifications are denoted with an asterisk ().

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SAMPLE SUMMARY

Project: PECO-2017-100 Racine, WI

Pace Project No.: 40254768

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40254768001	MH-111422	Air	11/14/22 12:05	11/15/22 11:08

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SAMPLE ANALYTE COUNT

Project: PECO-2017-100 Racine, WI

Pace Project No.: 40254768

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40254768001	MH-111422	TO-15	GT	5	PASI-M

PASI-M = Pace Analytical Services - Minneapolis

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ANALYTICAL RESULTS

Project: PECO-2017-100 Racine, WI

Pace Project No.: 40254768

Sample: MH-111422 **Lab ID: 40254768001** Collected: 11/14/22 12:05 Received: 11/15/22 11:08 Matrix: Air

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
TO15 MSV AIR									
Analytical Method: TO-15									
Pace Analytical Services - Minneapolis									
cis-1,2-Dichloroethene	7.4	ug/m3	1.3	0.35	1.63		11/30/22 02:30	156-59-2	
trans-1,2-Dichloroethene	<0.68	ug/m3	1.3	0.68	1.63		11/30/22 02:30	156-60-5	
Tetrachloroethene	5.3	ug/m3	1.1	0.40	1.63		11/30/22 02:30	127-18-4	
Trichloroethene	18.7	ug/m3	0.89	0.39	1.63		11/30/22 02:30	79-01-6	
Vinyl chloride	<0.16	ug/m3	0.42	0.16	1.63		11/30/22 02:30	75-01-4	

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QUALITY CONTROL DATA

Project: PECO-2017-100 Racine, WI
Pace Project No.: 40254768

QC Batch: 855656 Analysis Method: TO-15
QC Batch Method: TO-15 Analysis Description: TO15 MSV AIR Low Level
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 40254768001

METHOD BLANK: 4522799 Matrix: Air
Associated Lab Samples: 40254768001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
cis-1,2-Dichloroethene	ug/m3	<0.21	0.81	11/29/22 10:25	
Tetrachloroethene	ug/m3	<0.25	0.69	11/29/22 10:25	
trans-1,2-Dichloroethene	ug/m3	<0.42	0.81	11/29/22 10:25	
Trichloroethene	ug/m3	<0.24	0.55	11/29/22 10:25	
Vinyl chloride	ug/m3	<0.096	0.26	11/29/22 10:25	

LABORATORY CONTROL SAMPLE: 4522800

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
cis-1,2-Dichloroethene	ug/m3	42.1	50.1	119	70-136	
Tetrachloroethene	ug/m3	72	79.4	110	70-134	
trans-1,2-Dichloroethene	ug/m3	42.3	50.4	119	70-134	
Trichloroethene	ug/m3	57.2	64.6	113	70-134	
Vinyl chloride	ug/m3	27.2	29.6	109	70-132	

SAMPLE DUPLICATE: 4523698

Parameter	Units	92636350009 Result	Dup Result	RPD	Max RPD	Qualifiers
cis-1,2-Dichloroethene	ug/m3	ND	<0.34		25	
Tetrachloroethene	ug/m3	ND	<0.39		25	
trans-1,2-Dichloroethene	ug/m3	ND	<0.66		25	
Trichloroethene	ug/m3	ND	<0.38		25	
Vinyl chloride	ug/m3	ND	<0.15		25	

SAMPLE DUPLICATE: 4523699

Parameter	Units	92636350010 Result	Dup Result	RPD	Max RPD	Qualifiers
cis-1,2-Dichloroethene	ug/m3	ND	<0.33		25	
Tetrachloroethene	ug/m3	ND	<0.38		25	
trans-1,2-Dichloroethene	ug/m3	ND	<0.63		25	
Trichloroethene	ug/m3	0.44J	0.57J		25	
Vinyl chloride	ug/m3	ND	<0.15		25	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

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QUALIFIERS

Project: PECO-2017-100 Racine, WI

Pace Project No.: 40254768

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: PECO-2017-100 Racine, WI

Pace Project No.: 40254768

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40254768001	MH-111422	TO-15	855656		

REPORT OF LABORATORY ANALYSIS

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AIR: CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

53568

Page: 1 of 1

Section A

Required Client Information:

Section B

Required Project Information:

Section C

Invoice Information:

Company: APEX COMPANIES, LLC	Report To: jen.makino@apexcos.com	Attention:
Address: 205 W RANDOLPH ST	Copy To: jan.e.allan@apexcos.com	Company Name: APEX COMPANIES, LLC
STE 740, CHICAGO, IL 60606	Purchase Order No.: 1051973	Address: 205 W RANDOLPH ST, STE 740, CHICAGO, IL 60606
Email To: jen.makino@apexcos.com	Project Name: RACINE, WI	Pace Quote Reference:
Phone: 312-639-9204 Fax:	Project Number: PECO-2017-100	Pace Project Manager/Sales Rep: CHRIS HYSKA / MATT RAY
Requested Due Date/TAT: STD	Pace Profile #:	38191

Program	
<input type="checkbox"/> UST <input type="checkbox"/> Superfund <input type="checkbox"/> Emissions <input type="checkbox"/> Clean Air Act	
<input type="checkbox"/> Voluntary Clean Up <input type="checkbox"/> Dry Clean <input type="checkbox"/> RCRA <input type="checkbox"/> Other	
Location of Sampling by State: WI	Reporting Units ug/m ³ <input type="checkbox"/> mg/m ³ <input type="checkbox"/> PPBV <input type="checkbox"/> PPMV <input type="checkbox"/> Other <input type="checkbox"/>
Report Level: <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV <input type="checkbox"/> Other	

ITEM #	Section D Required Client Information AIR SAMPLE ID Sample IDs MUST BE UNIQUE	Valid Media Codes MEDIA CODE Tedlar Bag TB 1 Liter Summa Can 1LC 6 Liter Summa Can 6LC Low Volume Puff LVP High Volume Puff HVP Other PM10	MEDIA CODE	PID Reading (Client only)	COLLECTED				Canister Pressure (Initial Field - in Hg)	Canister Pressure (Final Field - in Hg)	Summa Can Number	Flow Control Number	Method: PM10 3C - Filled Gas (R) TO-15/16/17 TO-15/16/17/18 TO-15/16/17/18/19 TO-15/16/17/18/19/20 TO-15/16/17/18/19/20/21 TO-15/16/17/18/19/20/21/22 TO-15/16/17/18/19/20/21/22/23 TO-15/16/17/18/19/20/21/22/23/24 TO-15/16/17/18/19/20/21/22/23/24/25 TO-15/16/17/18/19/20/21/22/23/24/25/26 TO-15/16/17/18/19/20/21/22/23/24/25/26/27 TO-15/16/17/18/19/20/21/22/23/24/25/26/27/28 TO-15/16/17/18/19/20/21/22/23/24/25/26/27/28/29 TO-15/16/17/18/19/20/21/22/23/24/25/26/27/28/29/30 TO-15/16/17/18/19/20/21/22/23/24/25/26/27/28/29/30/31 TO-15/16/17/18/19/20/21/22/23/24/25/26/27/28/29/30/31/32 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DC#_Title: ENV-FRM-MIN4-0126 v00_Pending Log-in Checklist

Effective Date: 03/03/2022

SR Tech M.I. Date Initiated 11-15-22 PM MR2 Client Name Apex Profile # 38191 Pink shelf #1 #2

Issue Type (check all that apply)*	Client Name/Project Name on containers (if no COC)
<input checked="" type="checkbox"/> COC Issue <u>IRWO</u>	
Date/Time Received <u>11-15-22 11:08</u>	
EPIC Issue (check one)	Resolution
<input type="checkbox"/> Client not in Epic	
<input type="checkbox"/> Profile not in Epic	
<input type="checkbox"/> Add acode	
<input type="checkbox"/> Other	
	PM/Date _____

Sample Line Item	<u>4</u> BP1U	BP2U	BP3U	BP3S	BP3N	AG1U	AG1H	AG3S	AGIT	JGFU	JGCU	BJFU	WPDU	VG9M	VG9H	GN	SP5T	DWC	
	Check the box to the left to indicate that the container(s) received for line items _____ are identical to the container(s) documented for line item 1 for this																		
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			

Comments:

Logged in by (initial) _____ Date _____ WO _____

Qualtrax ID: 54330

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