



October 12, 2017

Mr. Chue Yee Yang  
Environmental Program Associate  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
2300 North Martin Luther King Drive  
Milwaukee, Wisconsin 53212

Re: **Site Investigation Work Plan, Bright Cleaners**  
7249 South 76<sup>th</sup> Street, Franklin, Milwaukee County, Wisconsin  
DNR BRRTS Activity No. 02-41-580017  
DNR FID No. 241928940

Dear Mr. Yang,

Phillips Edison & Company, on behalf of Franklin Station LLC previously retained Apex Companies, LLC (Apex) to conduct a Phase II Limited Subsurface Investigation at the dry cleaner tenant space at 7249 South 76<sup>th</sup> Street in Franklin, Milwaukee County, Wisconsin (the Site). This tenant space is located within Franklin Station LLC's Franklin Centre, a retail strip mall on South 76<sup>th</sup> Street in Franklin, Wisconsin (**Figure 1**).

As directed by the Wisconsin Department of Natural Resources (DNR), in its letter dated August 22, 2017, Franklin Station LLC hereby affirms that it has retained Apex to pursue closure for VOCs exceeding applicable standards for soil-gas in the immediate vicinity of the Site. Apex has prepared this Work Plan to describe the first step in site characterization. Based upon the results of this work, Apex will develop additional Work Plan(s) for expanded site characterization, if needed, and options for media-specific remediation

## **BACKGROUND INFORMATION**

**Site Description.** The Site consists of a 14.6-acre parcel of land developed with a 120,000-square foot (SF) multi-tenant shopping center, asphalt-paved parking and landscaped areas. The Site is bounded to the north by an outparcel bank, restaurant, and a multi-tenant commercial retail building followed by W Rawson Avenue; to the east by two outparcel banks and a restaurant followed by S 76<sup>th</sup> Street; to the south by undeveloped properties and condominium properties followed by Terrace Drive; and to the west by undeveloped properties followed by W Loomis Road/Wisconsin 36.

**Previous Reports.** Apex previously prepared a Phase I Environmental Site Assessment conducted on Franklin Center in August 2016 that identified the Bright Cleaners tenant as a Recognized Environmental Condition (REC) and recommended performing a Limited Phase II ESA.

Apex conducted a Limited Phase II Subsurface Investigation in the vicinity of the current dry cleaners tenant space in August 2016. The subsurface investigation included the advancement of three soil borings that were converted into temporary monitoring wells in the parking lot/driveway south of the dry cleaning tenant space; installation of three sub-slab soil gas probes within the tenant space; and collection/analysis of three soil samples, two groundwater samples and three sub-slab soil gas samples for VOCs including chlorinated solvents associated with dry cleaning operations. The soil gas analysis detected tetrachloroethene (PCE) at a concentration in excess of Wisconsin remediation objectives in two of the three sub-slab soil gas samples.

Based on the concentrations of PCE detected in soil gas, Apex submitted a Notification for Hazardous Substance Discharge to the Wisconsin Department of Natural Resources (DNR) dated July 21, 2017 in accordance with Chapter 292.11 Wisconsin Statutes (ch. 292 Wis. Stats.). As directed by in the letter dated August 22, 2017, the Wisconsin DNR requires that closure be obtained for PCE exceeding applicable standards. To meet the agency requirements, expanded soil, groundwater and soil-gas assessment is warranted. Further, the soil-gas data indicates that remediation is required to mitigate potential vapor intrusion to indoor air. To meet the agency requirements, the following steps will be needed:

1. An additional soil sample will be needed near the dry cleaning plant.
2. Groundwater monitoring wells will be needed to determine the site-specific groundwater gradient/flow direction and to document the extent of groundwater impacts, if any.
3. Delineate the lateral extent of sub-slab VOCs in soil-gas. Additional soil-gas sampling will be needed in the dry cleaner space and in the adjoining tenant spaces.
4. Once the extent of VOCs in soil-gas has been determined, remedial action will be required to achieve the applicable cleanup criteria and to mitigate vapor intrusion to indoor air.
5. If VOCs are detected in groundwater at concentrations in excess of applicable standards, remedial action will be required to address the groundwater contamination. At a minimum, groundwater attenuation<sup>1</sup> monitoring will be required to assess changes in groundwater quality over time. Based upon its review of the groundwater data, Apex

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<sup>1</sup> A variety of physical, chemical, or biological processes that, under favorable conditions, act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater. These in-situ processes include biodegradation, dispersion; dilution; sorption; volatilization; and chemical or biological stabilization, transformation, or destruction of contaminants.

will recommend the number and frequency of groundwater monitoring events to the Wisconsin DNR. The need for active groundwater treatment will be evaluated based on the groundwater monitoring data, including whether impacts extend beyond the property, and whether the groundwater plume is stable.

In addition to the above, periodic reporting to the Wisconsin DNR will be needed to show compliance and to pursue agency closure.

## **OBJECTIVES AND SCOPE OF WORK**

As required by Wisconsin regulations, Apex has prepared this Work Plan to conduct expanded subsurface environmental assessment to further document soil, groundwater and soil gas conditions at the Site. To meet these objectives, Apex will conduct the following scope of work:

- Task 1: Pre-field Activities
- Task 2: Expanded Soil Sampling & Analysis
- Task 3: Monitoring Well Installation, Groundwater Sampling & Analysis
- Task 4: Expanded Soil Gas Sampling & Analysis
- Task 5: Data Interpretation and Report Preparation
- Task 6: Agency Reporting

These tasks are described in the following sections:

### **Task 1: Pre-field Activities**

Pre-field activities will include preparation of a site-specific health and safety plan and underground utility clearances as summarized below.

**Health & Safety Plan Preparation.** In accordance with the Occupational Safety and Health Administration (OSHA), Apex previously prepared a site-specific health and safety plan (HSP) for a previous phase of subsurface assessment conducted at the Site. Apex will review this HSP for possible hazards and the procedures to be followed to safeguard worker health and safety during field activities at the Site. Apex will review HSP procedures with all subcontract personnel prior to the start of fieldwork.

**Utility Clearance.** Apex will arrange for a standard “call before you dig” 811 utility notification at least two working days prior to subsurface activities. The utility notification includes only public utilities located on public property and in the right-of-way and does not include utilities on private property. Apex will also retain a private utility locator service, a geophysical subcontractor, to clear areas proposed for invasive sampling.

## **Task 2: Expanded Soil Sampling & Analysis**

To further assess soil conditions at the Site, Apex will use a track-mounted hydraulic probe (Geoprobe™ rig) and/or jackhammer with Geoprobe™ sample rods to collect soil samples from up to four borings. Three of the soil borings will be advanced in the proposed monitoring well locations described in Task 3, and one soil boring will be advanced within the dry cleaners tenant space to evaluate the source area (**Figure 2**). Each of the borings will be advanced to a maximum depth of 20 feet below ground surface (bgs).

**Lithologic Description.** Soil samples will be logged continuously from ground surface to the bottom of each boring for lithologic description. An experienced Apex geologist will document the subsurface conditions (soil type, photoionization detector [PID] measurements, the presence of staining, odors and groundwater levels, etc.) in each boring.

**Soil Sample Screening.** Soil samples will be screened in the field for chemical odors, evidence of staining or other visible indications of contamination, and volatile organic emissions using a PID. Sample selection will be based upon the results of field screening where samples exhibiting indications of chemical release, if encountered, will be selected for analysis.

Following collection, the soil samples will be placed in clean, laboratory-supplied vials or bottles, labeled and placed in a chilled cooler pending delivery to the analytical laboratory. Appropriate chain-of-custody protocols will be maintained throughout the sample-handling process. Apex proposes that up to four soil samples be submitted for analysis for VOCs by EPA Method 5035/8260B.

## **Task 3: Monitoring Well Installation, Groundwater Sampling & Analysis**

Apex proposes to install three dedicated groundwater monitoring wells in the vicinity of the dry cleaning tenant space. The dedicated monitoring well will be installed to a maximum depth of 20 feet bgs. The boring will be advanced using 8.25-inch diameter auger and Apex will construct a monitoring well using 2-inch diameter, schedule 40 PVC, factory-slotted well casing and blank riser. Following drilling and soil sampling, a well screen and riser will be placed into the open borehole and a sand filter pack will be placed in the annulus surrounding the well casing. This sand pack will be placed to a depth of 2-feet above the well screen. The remainder of the borehole will be backfilled with a well seal consisting of bentonite clay and grout. The monitoring wells will be completed at ground surface using a flush-mount well box.

**Elevation Survey/Water Level Measurement.** Following installation, the top of each casing for the dedicated monitoring wells will be surveyed for lateral and vertical control by a licensed surveyor. At least one day following well installation, stabilized ground water levels will be

measured in each well within an accuracy of 0.01-foot. The water level data and the results of the well elevation survey will be used to calculate the groundwater gradient and lateral flow direction at the Site.

**Monitoring Well Development.** Following installation, the monitoring wells will be developed to remove sediment and to improve hydraulic communication with the surrounding aquifer. Well development procedures will consist of the removal of approximately three to five well casing volumes of groundwater, or until the well goes dry, whichever occurs first. Apex will develop the wells to allow for collection of water samples that are more representative of the aquifer and are less subject to interference from sediments in the water samples.

**Groundwater Sampling.** Groundwater samples will be collected from the dedicated monitoring well using a low flow pump, following Wisconsin DNR-approved protocols. Following collection, the groundwater samples will be placed in clean, laboratory-supplied vials or bottles, labeled and placed in a chilled cooler pending delivery to the analytical laboratory. Appropriate chain-of-custody protocols will be maintained throughout the sample-handling process.

One groundwater sample from each monitoring well (seven samples) will be analyzed for VOCs by EPA Method 8260. For quality control purposes, one replicate groundwater sample and one trip blank will also be analyzed for VOCs. The groundwater analysis will be performed by a NELAC-certified lab on a one-week laboratory turnaround basis.

#### **Task 4: Expanded Soil Gas Sampling & Analysis**

To further assess soil gas conditions at the Site, Apex will install up to three sub-slab vapor probes in an attempt to delineate PCE concentrations in excess of Vapor Intrusion Screening Levels. One vapor probe will be installed in the northern portion of the dry cleaning tenant space and one soil vapor probe will be installed in the southern half of the two adjoining tenant spaces (**Figure 3**). Vapor probe locations will be selected based on the locations of equipment and material storage in the tenant spaces. Apex will coordinate with the tenants to best locate each vapor probe.

Vapor probes will be installed through the concrete slab using a hammer drill and will be installed flush with the floor. Sub-slab vapor samples will be collected from each sampling location using pre-cleaned, laboratory provided Summa canisters. Tubing connections will be checked prior to sampling to ensure proper sealing using a vacuum pump. Each vapor probe will be purged of a minimum of 3 probe volumes of air prior to sampling. Samples will be collected at a rate not to exceed 0.2 liters per minute. Following sample collection, vapor probes will be removed and the concrete floor in the area of the vapor probe will be resurfaced with hydraulic cement.

Sub-slab vapor samples will be submitted to an analytical laboratory for analysis. Appropriate chain-of-custody protocols will be maintained throughout the sample-handling process. Apex proposes that up to three sub-slab soil gas samples be submitted for analysis for VOCs by EPA Method TO-15.

#### **Task 5: Data Interpretation and Report Preparation**

Apex will prepare a report that will include the results of additional assessment, to define the lateral and vertical extent of chemical impacts; and will describe proposed measures to mitigate such impacts.

- The soil data will be compared to Non-Industrial and Industrial Residual Contaminant Levels (RCLs) for Direct Contact and the soil (leaching) component to groundwater, in accordance with WAC NR 720.
- The groundwater data will be compared to Groundwater Quality Standards cited in WAC NR 140.10 Table 1 and Vapor Risk Screening Levels (VRSLs) for groundwater for a commercial property, in accordance with WAC NR 140 and WAC NR 716.
- The soil-gas data will be compared to sub-slab Vapor Action Levels (VALs) for commercial property, in accordance with WAC NR 716.

The report will include a site plan showing the location of soil borings, monitoring wells and sub-slab vapor probes; the soil, groundwater and soil gas data summarized in data tables; copies of the laboratory reports; boring logs; and a description of our field protocols. Our field observations (soil type, PID measurements, the presence of odors/staining, depth to groundwater, if encountered and soil sampling depths) will be presented in the boring logs.

The soil, groundwater and soil gas analysis will be performed by a National Environmental Laboratory Accreditation Conference (NELAC) certified laboratory on a seven-day laboratory turnaround basis.

The report will also include a description of the rationale for all conclusions and recommendations relative to Wisconsin regulations.

- Assuming that VOCs are detected in groundwater at concentrations in excess of applicable standards and have been delineated, Apex will provide recommendations for future groundwater monitoring events (quarterly or semi-annual) to document changes in groundwater quality over time, or other appropriate remedial measures.

- Also, once the extent of VOCs in soil-gas has been determined, Apex will provide options to mitigate vapor intrusion to indoor air, address the source of VOCs in soil gas, or other appropriate remedial measures.
- The specific scope of work for such remedial action will be submitted to Wisconsin DNR in a separate Work Plan.

If you have any questions regarding the technical approach to the Site Investigation Work Plan, please contact Jane Allan at 513) 771-3617 x3801. Thank you for your assistance with this matter.

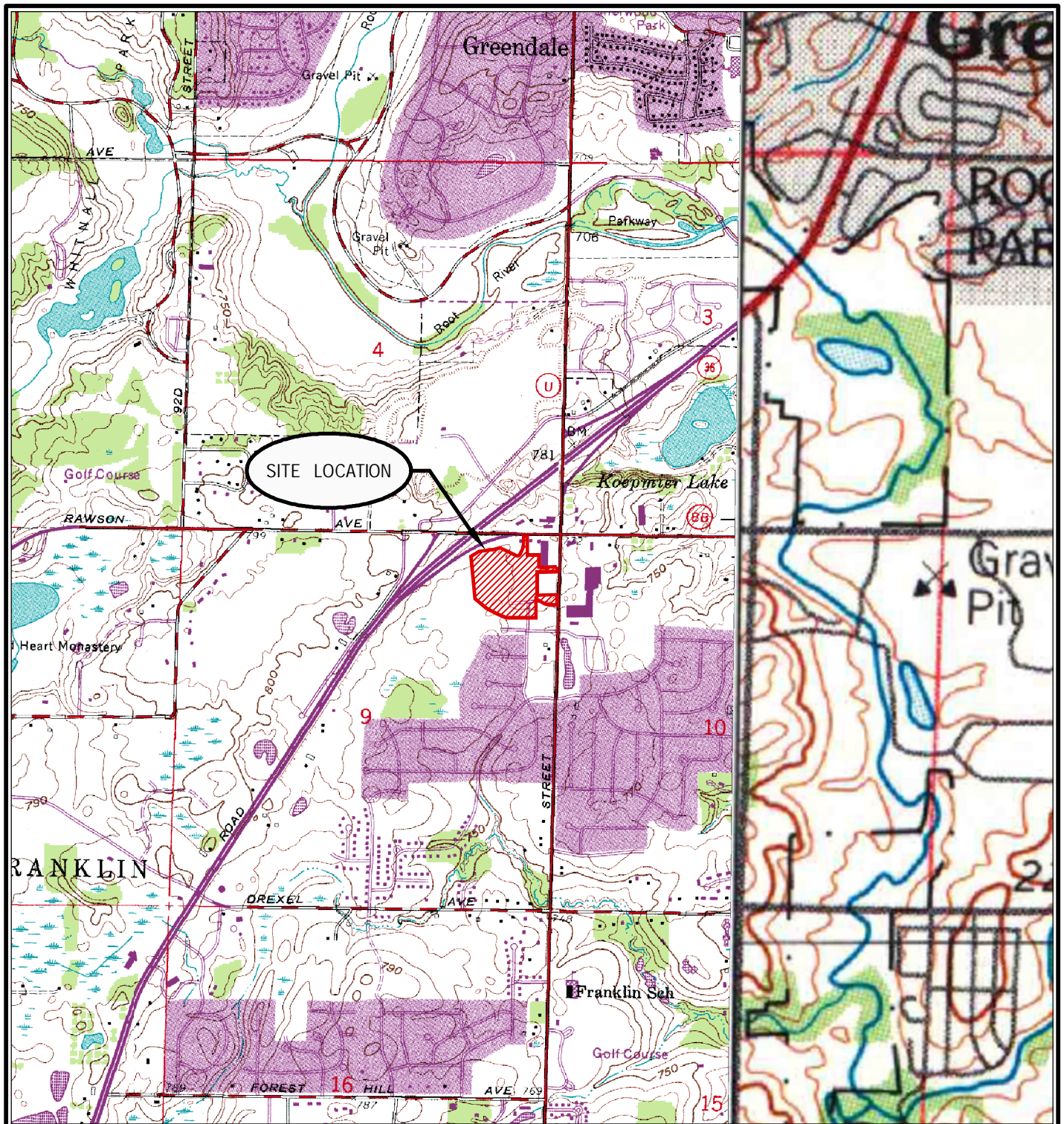
Sincerely,  
**Apex Companies, LLC**



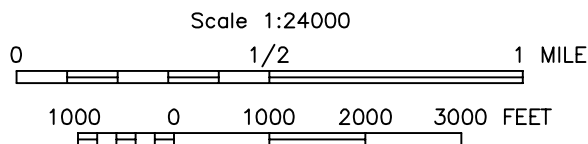
Jane Allan  
Project Manager



Joseph P. Becker, P.G.  
Project Hydrogeologist



QUADRANGLE LOCATION



(SOURCE OF MAP IS USGS 7.5 MINUTE QUADRANGLE MAP, HALES CORNERS (1994), WISCONSIN)



CHECK BY	JB
DRAWN BY	OS
DATE	8-29-16
SCALE	AS SHOWN
CAD NO.	PECO_2016.78A
PRJ NO.	PECO_2016.78

SITE LOCATION MAP

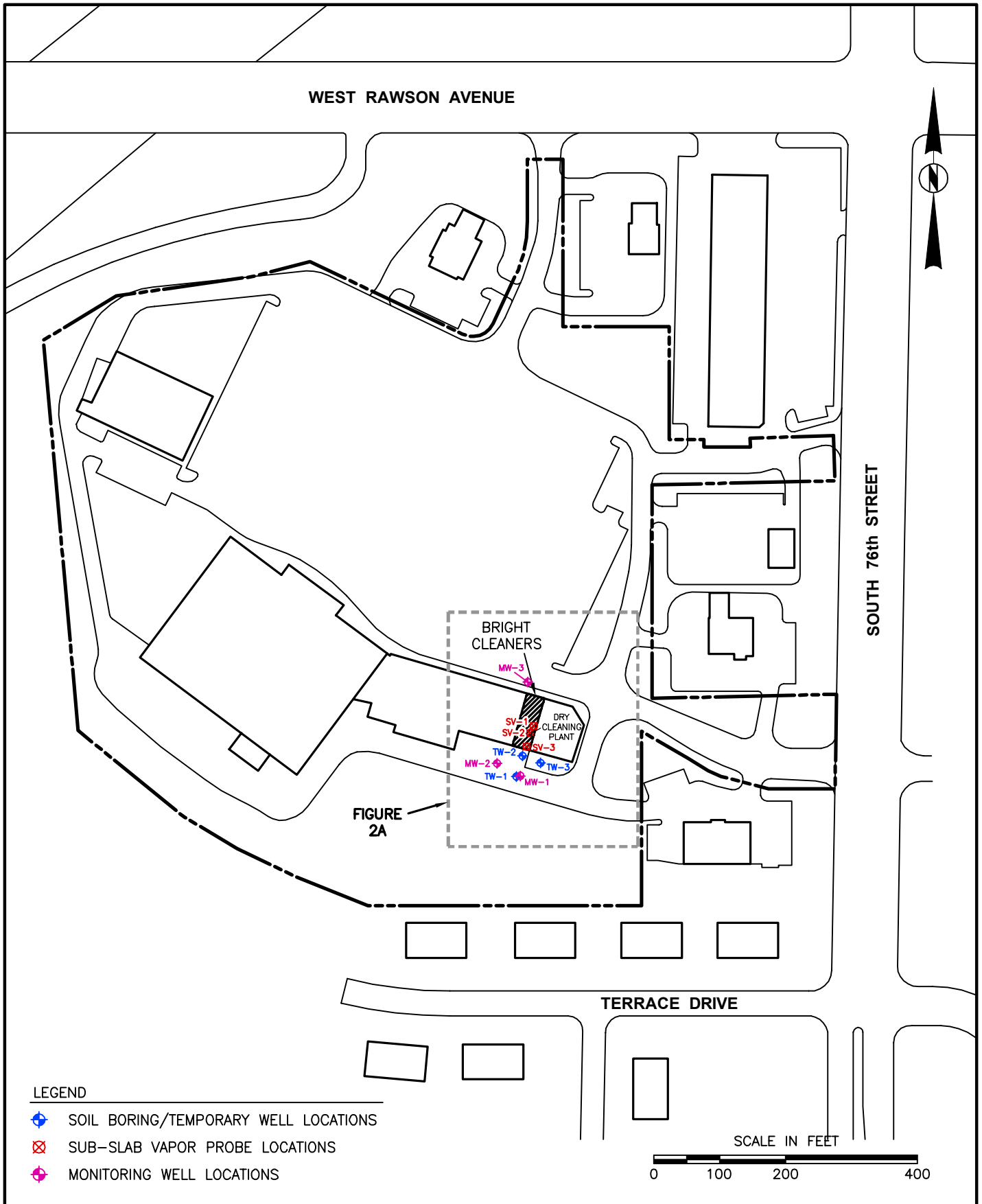
BRIGHT CLEANERS – FRANKLIN  
7249 SOUTH 76th STREE  
FRANKLIN, WISCONSIN



FIGURE

1



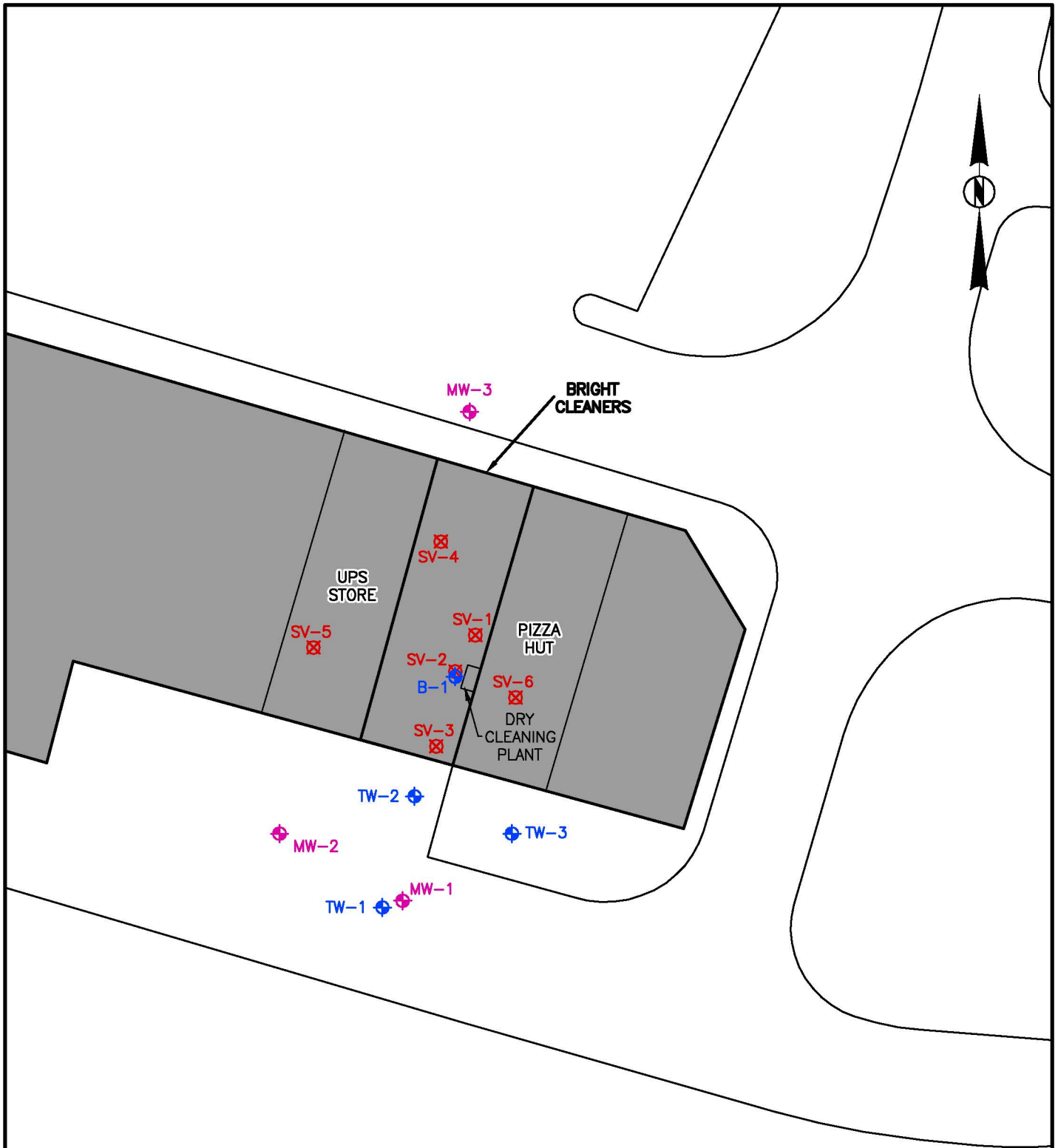


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DATE	08-30-17
SCALE	AS SHOWN
CAD NO.	PECO_2017.68A
PRJ NO.	PECO_2017.68




SITE PLAN  
 BRIGHT CLEANERS – FRANKLIN  
 7249 SOUTH 76th STREET  
 FRANKLIN, WISCONSIN



FIGURE  
2



**LEGEND**

-  SOIL BORING/TEMPORARY WELL LOCATIONS
-  SUB-SLAB VAPOR PROBE LOCATIONS
-  MONITORING WELL LOCATIONS



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PRJ NO.	PECO_2017.68

**SITE DETAIL**  
**BRIGHT CLEANERS – FRANKLIN CENTRE**  
**7249 SOUTH 76th STREET**  
**FRANKLIN, WISCONSIN**



FIGURE  
**3**