



June 7, 2018

Mr. Tom Meyers  
Phillips Edison & Company  
11501 Northlake Drive  
Cincinnati, OH 45249

Subject: Review of Phase II Limited Subsurface Investigation & Remedial Action Options and Design Report  
Bright Cleaners Tenant Space  
7249 South 76<sup>th</sup> Street  
Franklin, WI 53132  
WDNR BRRTS #: 02-41-580017; WDNR FID #: 241928940

Dear Mr. Meyers:

The Wisconsin Department of Natural Resources (DNR) has reviewed the submittals for the subject site, *Results of Phase II Limited Subsurface Investigation* (dated September 23, 2016), and *Remedial Action Options and Design Report* (Report), dated January 24, 2018, prepared by Apex Companies, LLC (Apex). The DNR called your consultant, Apex, on April 6, 2018, to communicate the information presented in this letter.

#### Background

The site is approximately 0.5 acres in size. It is located within the Franklin Centre that consists of a 14.6-acre parcel of land developed with a 120,000-square-foot multi-tenant shopping center, asphalt-paved parking and landscaped areas. Historical records show that two dry cleaning businesses have operated at the site: Sun Cleaners in 1995 and Bright Cleaners from 1999 to present. In 2011, a discharge of trichloroethylene (TCE) on the south end of the dry cleaner tenant space was reported to the DNR, and an environmental contamination case was opened (BRRTS # 02-41-557111). After completing an excavation to address the TCE impacts in soil, the site was closed for the reported TCE discharge, and Bright Cleaners continued the dry cleaning operation to present.

A Phase I Environmental Site Assessment was conducted in August 2016. The use of dry cleaning solvents was identified as a recognized environmental concern (REC). To assess the risk of subsurface impacts associated with the use of dry cleaning solvents, a Phase II limited subsurface investigation was conducted in September 2016. Analysis of soil and groundwater samples collected showed minimal impacts. Six soil-gas samples were collected below the concrete floor slab in and adjacent to the dry cleaner tenant space. The soil-gas analysis detected tetrachloroethylene (PCE) above the sub-slab vapor risk screening level (VRSL) for small commercial establishments.

The proposed remedial action consists of installation of sub-slab depressurization system (SSDS), for the mitigation of potential indoor vapor intrusion associated with the PCE discharge at the site.

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### Completion of the Site Investigation

The Phase II limited subsurface investigation report was reviewed for compliance with Wis. Admin. § NR 716. The DNR has determined that additional actions and/or information are necessary to complete and document the site investigation, as summarized below:

- Evaluation of potential/known source area

Explain how the reported discharge(s) from the on-going dry cleaning operations has been evaluated. Wis. Admin. § NR 716.07 (site investigation scoping), and Wis. Admin. § NR 716.09 (site investigation work plan), require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with the discharges. Describe the conditions of the dry cleaning machines and the floor (cracks, drains, etc.). Determine the pathways causing vapor contaminant migration. Discuss how the collected samples (in terms of location and depth) were determined to evaluate potential source areas and migration pathways. More sampling (including shallow soil samples) may be needed to assess the identified source areas and migration pathways.

- Degree and extent of contamination in all affected media

Wis. Admin. § NR 716.11(3)(a) requires the field investigation to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media. Wis. Admin. § NR 716.15(4)(c) and (d) require the site investigation report to include isoconcentration maps and cross sections to depict the hazardous substance concentrations in each environmental medium. These figures should include data at the sampling locations to support the data interpolation and delineation of the extent of contamination.

- Vapor

Wis. Admin. § NR 716.11(5) specifies that the field investigation include an evaluation of the “pathways for migration of contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which vapors, free product or contaminated water may flow”. Six soil-gas samples were collected below the concrete floor slab and adjacent to the dry cleaner tenant space. Discuss the migration pathways evaluated (cracks, drainage, utilities, and the possibility of indoor air intrusion into the subsurface during sample collection, etc.) and the manner in which PCE vapors migrated to the sampling locations with PCE detections.

### Remedial Action Plan

Regarding the conceptual remedial action plan that was presented in the Report, the DNR provides the following comments with respect to Wis. Admin. §§ NR 722.07 and 726.05:

- Evaluate the degree and extent of contamination identified during site investigation activities to propose appropriate remedial actions. This includes an evaluation of the direct contact pathway for the areas that have or, based on sampling data, are inferred to have contamination over any residual contaminant level (RCL), including the non-industrial direct contact RCL.
- Explain how the proposed SSDS would address areas shown to have vapor concentrations above VRSLs.

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- The DNR would like to clarify that the installation of a vapor mitigation system (e.g. SSDS) is not a remedial action. In situations where vapors are present above VRSLs, a remedial action is required to reduce the mass and concentration of volatile compounds.

#### Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. § NR 716.09(1), the DNR is requesting the submittal of a revised Site Investigation Work Plan (SIWP) by August 7, 2018, to address the above comments.
- Per Wis. Admin. § NR 716.11(2), field investigation activities must begin within 90 days of submittal of the work plan.
- Per Wis. Admin. § NR 716.15(1)(a), the DNR is requesting the submittal of a Site Investigation Report (SIR) within 60 days after completion of the field investigation and receipt of laboratory data. The report must comply with Wis. Admin. § NR 716.15(2) and provide the information that was not addressed in the Report previously submitted to the DNR.
- Per Wis. Admin. § NR 722.13(1), the DNR is requesting the submittal of a revised Remedial Action Options Report (RAOR) based on further evaluation of site data and any additional sampling completed. The RAOR is to be submitted within 60 days after submitting the Site Investigation Report.

The DNR encourages all reports to be submitted with a fee, per Wis. Admin. § NR 749, for review and a written response to ensure that the case is making efficient progress through the environmental investigation and cleanup process.

The Department appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.263.8639 or at [eric.amadi@wisconsin.gov](mailto:eric.amadi@wisconsin.gov)

Sincerely,

*Eric Amadi*

Eric Amadi - Hydrogeologist  
Remediation & Redevelopment Program  
Southeast Region, Milwaukee

cc: Steve Newlin - Apex Companies, LLC (via email)  
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