



October 5, 2018

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

Subject: Review of Revised Remedial Action Options and Design Report
Bright Cleaners Tenant Space
7249 South 76th 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 submittal, *Revised Remedial Action Options and Design Report* (Report), received on August 14, 2018, prepared by Apex Companies, LLC (Apex), for the subject site. The DNR tried to contact your consultant, Apex, on September 28, October 2, and October 4, 2018, to discuss the information presented in this letter. However, Apex was not available. Thus, the DNR has decided to send the letter without first discussing the information with Apex.

Remedial Action Plan:

Based on information provided in the Report, Apex believes the volatile organic compounds (VOCs) detected in soil-gas have been delineated. The proposed remedial action consists of installation of vapor extraction system (VES) to mitigate vapor intrusion to indoor air. To assess for potential seasonal fluctuations of the vapor concentration beneath the building, additional sub-slab vapor sampling will be conducted during the heating season. An additional three to four vapor points will be installed/sampled prior to the remedial system being installed. The locations of the vapor points will be installed at locations based on accessibility within the store. However, the locations will be somewhat similar to the original locations surrounding SV-1 and SV-2, where the vapor action levels exceedances have been identified. The additional vapor sampling will assist in designing the system. The DNR understands the VES is a sub-slab depressurization system for mitigation of potential indoor vapor intrusion associated with PCE discharge at the site and installation of SVE is not a remedial action.

The VES will include the following:

- i) An extraction sump that is at least two cubic feet and extends at least 6 inches below the slab (larger sumps may be excavated as needed).
- ii) A PVC pipe of at least 3 inches in diameter from extraction sump to the intake side of an in-line fan capable of at least 0.25 inches water column at the suction point and measurable vacuum at the farthest edges of areas served by the suction pit.
- iii) All visible cracks and joints in the slab (including the location where the PVC pipe exits the slab) and foundation walls are sealed.
- iv) The pipe will exhaust outside the building at least 10 feet above ground and at least 10 feet from any door or window; and,
- v) Additional extraction sumps meeting the requirements described above shall be installed as needed.

Following VES installation, an additional communication test will be performed to confirm that the extraction system is performing as intended. These tests will be performed approximately one month and six months after system has been put into operation. Due to indoor sources of PCE in the Bright Cleaners Facility, Apex is not

Mr. Tom Meyers
RE: Review of Revised Remedial Action Options and Design Report
Bright Cleaners Tenant Space
BRRTS #: 02-41-580017

Page 2 of 2

proposing to conduct any sampling of indoor air. Following installation and post-installation performance testing, a VES installation letter report documenting installation and testing activities, will be prepared.

To better define the area that warrants treatment, the VES will be operated for a period of four months and then an additional round of post-operation soil-gas sampling, will be conducted. The objective of this additional round of sampling would be to assess whether the VES has reduced the target analytes near previous soil-gas samples SV-1 and SV-2 to concentrations below VRSLs. Also, three additional soil-gas samples will be collected in the area around SV-1 and SV-2 for analysis. Discreet soil-gas samples will be analyzed for the target analytes by EPA Method TO-15. Based on the performance monitoring, the need for continued operation of the VES and/or additional verification sampling of soil-gas, will be determined.

The DNR agrees with the remedial concept presented in the Report, but cannot approve without details as requested/recommended below:

- The statement about finding “no utilities” doesn’t seem to be consistent with what is normal found in an operation like this (implies no water lines, no sewer connections within the space). Please identify where utilities might be located.
- Explain the other machines seen in photographs.
- To determine the area needing mitigation, and prior to installation of the mitigation system, conduct sub-slab vapor sampling just to the west of the west wall, near the other machines (in the UPS Store space); and just to the east of the east wall (in the Pizza Hut space), near the dry cleaning machine and SV-1.
- Commission the mitigation system - collect three performance monitoring events over time period of not less than 6 months (see RR-800: <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>); Appendix D.
- To determine if the system is not required any longer, shut fan(s) off. Then collect at least three rounds of sub-slab samples (first samples collected 2 to 4 weeks after shut-down; second samples collected 2 to 6 months after shut-down; third samples collected within 1 year after shut-down; and at least two of the samples collected during heating season). See: <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>; App. F.
- Provide specific details for the proposed action, to include location of drop points(s) for extraction, location for additional sub-slab testing (as recommended above), location for pressure differential testing, and specific schedule for running the system and for follow-up testing.

Please submit a revised Remedial Action Options and Design Report (within 60 days of the date of this letter - by December 5, 2018), incorporating the requests/recommendations indicated above.

The DNR 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

Sincerely,

Eric Amadi

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

cc: Steve Newlin - Apex Companies, LLC, 300 South Wacker Drive, Chicago, IL 600606 (via email)
SER Case File FID #: 241928940; BRRTS #: 02-41-580017