

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do not use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 10/21)

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Reuschlein	First Robert	MI	Organization/ Business Name Jomblee, Inc.
Mailing Address 4930 Ascot Lane		City Madison	State ZIP Code WI 53711
Phone # (include area code) (608) 230-6640	Fax # (include area code)	Email bobreuschlein@gmail.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property *Formerly*
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Contact Information (to be contacted with questions about this request) Select if same as requester

Contact Last Name Reuschlein	First Robert	MI	Organization/ Business Name Jomblee, Inc.
Mailing Address 4930 Ascot Lane		City Madison	State ZIP Code WI 53711
Phone # (include area code) (608) 230-6640	Fax # (include area code)	Email bobreuschlein@gmail.com	

Environmental Consultant (if applicable)

Contact Last Name Pelczar	First Daniel	MI K.	Organization/ Business Name Giles Engineering Associates, Inc.
Mailing Address N8 W22350 Johnson Dr., Suite A1		City Waukesha	State ZIP Code WI 53186
Phone # (include area code) (262) 544-0118	Fax # (include area code)	Email dpelczar@gilesenr.com	

Property Owner (if different from requester)

Contact Last Name Beire	First Carlee	MI	Organization/ Business Name Ener-Con Companies, Inc.
Mailing Address 8575 W. Forest Home Avenue, Suite 160		City Greenfield	State ZIP Code WI 53228
Phone # (include area code) (414) 425-4939	Fax # (include area code)	Email carlee@eccommercial.net	

Section 2. Property Information

Property Name Pershing Plaza Shopping Center	FID No. (if known) 230007690
BRRTS No. (if known) 02-30-582211	Parcel Identification Number 03-122-11-104-008

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Street Address 7516 Pershing Blvd.	City Kenosha	State WI	ZIP Code 53142
County Kenosha	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of	Property is composed of: <input type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres 8.35

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason:

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: **[Numbers in brackets are for WI DNR Use]**

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

**Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request**

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"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

Section 4. Request for Liability Clarification (cont.)

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the Property and the person who will lease the Property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
- (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
- (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.
Vapor Mitigation System Commissioning Plan & Pressure Field Extension Test Results for review and approval.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/lqu.html#tabx4.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s. 75.106, Wis. Stats. [666]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

- Groundwater
- Soil
- Sediment
- Other medium - Describe: Sub-Slab and indoor air.

Date of Collection: 7/25-26/19, 4/16/20 & 12/3/20.

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: _____

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: Robert Reuschlein
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Daniel K. Pelgar
Signature

10/6/2023
Date Signed

Senior Project Manager
Title

(262) 544-0118
Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

DNR NORTHERN REGION

Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION

Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION

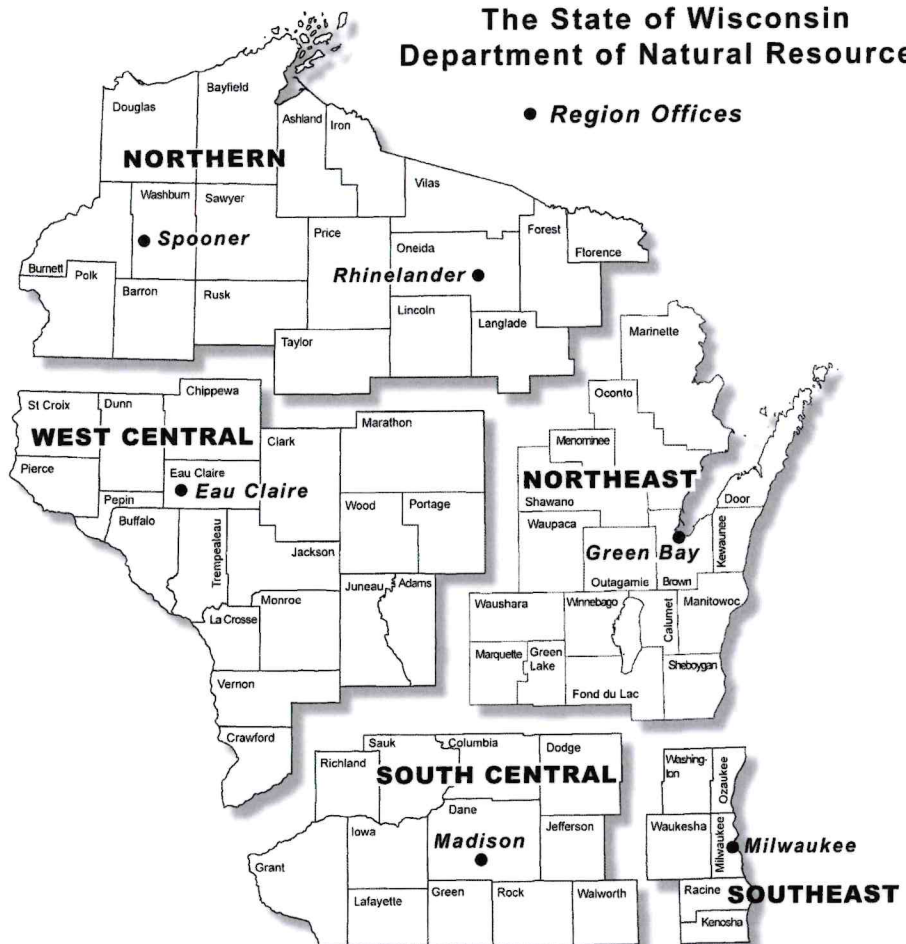
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION

Attn: RR Program Assistant
Milwaukee DNR Office
1027 West St. Paul Ave
Milwaukee WI 53233

DNR WEST CENTRAL REGION

Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



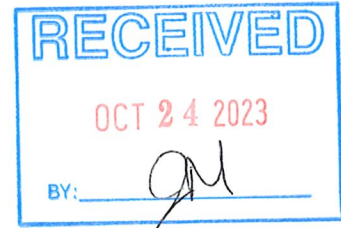
GILES

ENGINEERING ASSOCIATES, INC.

GEOTECHNICAL, ENVIRONMENTAL & CONSTRUCTION MATERIALS CONSULTANTS

- Dallas, TX
- Los Angeles, CA
- Manassas, VA
- Milwaukee, WI

October 19, 2023



Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Southeast Region
1027 W. St. Paul Ave.
Milwaukee, WI 53233

Attention: Ms. Jennifer Meyer
Environmental Program Associate

Subject: **Vapor Mitigation System Commissioning Plan &
Previous Pressure Field Extension Test Results**
Pershing Plaza Shopping Center
(Former Lakeside Cleaners Lease Space)
7536 Pershing Blvd.
Kenosha, Wisconsin 53142
BRRTS #: 02-30-582211 & FID #: 230007690
Giles Project No. 1E-1902007

Dear Ms. Meyer:

The Vapor Mitigation System Commissioning Plan & Previous Pressure Field Extension Test Results was uploaded to the Wisconsin Department of Natural Resources (WDNR) Remediation and Redevelopment (RR) web-portal on Thursday, October 19, 2023, to Mr. Paul Grittner.

A Technical Assistance Request (Form 4400-237) was included within this document and the \$700 review fee is attached for review of the VMS Commissioning Plan.

If there are any questions regarding the information contained herein, please contact the undersigned at your convenience.

Sincerely,

GILES ENGINEERING ASSOCIATES, INC.

Daniel K. Pelczar, P.G., C.P.G.
Senior Project Manager

Distribution: Wisconsin Department of Natural Resources
Attn: Ms. Jennifer Meyer (Mail)

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ENGINEERING ASSOCIATES, INC.

GEOTECHNICAL, ENVIRONMENTAL & CONSTRUCTION MATERIALS CONSULTANTS

- Dallas, TX
- Los Angeles, CA
- Manassas, VA
- Milwaukee, WI

October 19, 2023

Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Waukesha Office
141 NW Barstow St., Room 180
Waukesha, WI 53188

Attention: Mr. Paul Grittner
Advanced Hydrogeologist

Subject: **Vapor Mitigation System Commissioning Plan &
Previous Pressure Field Extension Test Results**
Pershing Plaza Shopping Center
(Former Lakeside Cleaners Lease Space)
7536 Pershing Blvd.
Kenosha, Wisconsin 53142
BRRTS #: 02-30-582211 & FID #: 230007690
Giles Project No. 1E-1902007

Dear Mr. Grittner:

On behalf of Jomblee, Inc. (Jomblee), Giles Engineering Associates, Inc. (Giles) is submitting this Vapor Mitigation System Commissioning Plan and Previous Pressure Field Extension Test Results for the Pershing Plaza Shopping Center (former Lakeside Cleaners lease space) located at 7536 Pershing Boulevard in the City of Kenosha, Kenosha County, Wisconsin ("Site"). The general location of the Site is shown on Figure 1.

BACKGROUND INFORMATION

Jomblee operated Lakeside Cleaners, which provided dry cleaning services at the Site for at least 15 years and ceased operations in late 2011. Ener-Con Companies, Inc., the owner of a portion of the Pershing Plaza Shopping Center (d.b.a., KRT, LLC), retained The Sigma Group (Sigma) to collect soil samples at the former dry-cleaning facility in March 2018. chlorinated volatile organic compounds (CVOCs) were detected at concentrations exceeding the Wisconsin Administrative Code (WAC) Natural Resources Chapter (NR Ch.) 720 Residual Contaminant Levels (RCLs) for groundwater protection in the three soil samples (B-1 through B-3) collected within the building. On September 11, 2018, based on the soil sampling results, attorneys (Michael, Best & Friedrich, LLP) for the Site owner notified the Wisconsin Department of Natural Resources (WDNR) of a spill or release of dry-cleaning solvent at the Pershing Plaza Shopping Center (Former Lakeside Cleaners or FLC).

A "Responsible Party" (RP) letter was issued to Jomblee dated September 13, 2018. The RP letter stated that a Site Investigation would need to be conducted to define the degree and extent of impacted soil and groundwater at the Site, and a vapor intrusion assessment would also need to be conducted. Giles was retained by Jomblee to begin the Site Investigation activities to define

the lateral and vertical extent of soil and groundwater impacts at the Site and to evaluate the potential vapor intrusion risk to the on-Site building.

Documentation following the RP letter consisted of the following:

- Work Plan for Initial Site Investigation Site Investigation Services, (Giles, February 25, 2019).
- Initial Site Investigation Summary Report (Giles, November 8, 2019).
 - June 1, 2020; email of sampling results and Figure; B-5 and B-6 (soil – April 16, 2020), V-2 through V-4 (sub-slab – April 14, 2020) and MW-1 through MW-4 (groundwater – May 7, 2020).
 - November 17, 2000; Site Investigation Sample Results Notification (SISRN); MW-1 through MW-5 (groundwater – October 13, 2020).
 - January 1, 2021; SISRN; MW-1 through MW-5 (groundwater – January 11, 2021).
 - February 26, 2021; SISRN; VP-5 (sub-slab – December 2, 2020).
- Technical Assistance Meeting Request (Giles, February 26, 2021).
 - March 8, 2021; email of soil analytical results (to date) and groundwater flow map (January 11, 2011).
 - April 23, 2021; SISRN; MW-1 through MW-5 (groundwater – April 13, 2021).
 - July 28, 2021; SISRN; MW-1 through MW-5 (groundwater – July 13, 2021).
 - November 4, 2021; SISRN; MW-1 through MW-5 (groundwater – October 14, 2021).
 - May 16, 2022; SISRN; MW-1 through MW-5 (groundwater – April 14, 2022).
- Review of information provided in “Request for Technical Assistance Meeting” (WDNR, September 16, 2022). A copy of this correspondence is provided as Attachment A.
 - September 19, 2022; email of garage photos.
 - September 20, 2022; email of first two pressure extension field test.
 - September 20, 2022; email of workplan/discussion talking points.

The FLC lease space (Unit 7536) is currently occupied by FastSigns, a printing company. To the north is Paladin Protection Academy (Unit 7532), a concealed carry training, firearms and ammunition facility. Julie Nails and Spa is located in the lease space (Unit 7540) to the south, with a Piggly Wiggly grocery store (Unit 7600) beyond, and the location of the Site (a.k.a., Unit 7536) within the shopping center is shown on Figure 2. A detailed Site map is also provided as Figure 3.

Chemicals of Concern

The chemicals of concern that were analyzed for this project included CVOCs that were analyzed by method TO-15 included a short list of the following parameters:

- Tetrachloroethene (PCE).

- Trichloroethene (TCE),
- *Cis*-1,2-Dichloroethene (*cis*-1,2-DCE),
- *Trans*-1,2-Dichloroethene (*trans*-1,2-DCE),
- 1,1-Dichloroethene (1,1-DCE),
- 1,2-Dichloroethane (1,2-DCA), and
- Vinyl Chloride.

Sub-Slab Vapor Analytical Results

A total of five sub-slab vapor ports (VP-1 through VP-5) were installed between 2019 and 2020. VP-1 was installed on July 25, 2019, VP-2, through VP-4 were installed on April 16, 2020, and VP-5 was installed on December 4, 2020.

Sub-slab sample VP-1 installed within the footprint of the former dry-cleaning machine was detected with PCE concentrations of 620,000 ug/m³ and TCE of 13,600 ug/m³ exceeding their respective sub-slab Vapor Risk Screening Levels (VRSLs) for small of 5,800 ug/m³/290 ug/m³ and large commercial/industrial buildings of 18,000 ug/m³/880 ug/m³, respectively. This sample was collected on July 26, 2019.

Sub-slab sample VP-3 installed within the footprint of the Julie Nails & Spa (Unit 7540) contained PCE of 217,000 ug/m³ and TCE of 970 ug/m³ exceeding their respective sub-slab VRSLs for small of 5,800 ug/m³/290 ug/m³ and large commercial/industrial buildings of 18,000 ug/m³/880 ug/m³, respectively.

Sub-slab samples VP-2 (former dry cleaners), VP-4 (north adjoining unit) and VP-5 (Piggly Wiggly) were less than the residential VRSLs or were below the laboratory's limit of detection (LOD).

The sub-slab vapor analytical results are summarized in Table 1, and the laboratory report and chain-of-custody are included in Attachment B. The results of these sub-slab vapor analysis are presented on Figure 4.

Indoor Air Sample Results

No CVOCs were detected above a Vapor Action Level (VAL) in the indoor air sample (IA-1) collected from the former Lakeside Cleaners lease space on July 25, 2019.

The indoor air analytical results are summarized in Table 2, and the laboratory report and chain-of-custody are included in Attachment B. The results of the indoor air analysis are presented on Figure 4.

Initial Pressure Field Extension Testing and Vapor Mitigation System Installation

The initial Pressure Field Extension (PFE) test was performed by Allis Environmental Services, LLC (Allis) of West Allis, Wisconsin which were subcontracted by Radon Remedy of Pleasant

Prairie, Wisconsin. Allis performed this work on March 23, 2021. Negative pressure readings ranged from -1.3 to 0.00 inches of water and are summarized on Table 3 and are shown on Figure 5.

The initial PFE testing utilized a Dyer Series 475 Mark III manometer with units of inches of water. The PFE test included six holes (PFE-1 through PFE-6) that were drilled into the concrete that was approximately 4.5-inches thick plus one existing Vapor Port (VP-5) within Piggly Wiggly unit. The initial PFE test were performed using a standard shop vacuum cleaner. The extraction hole was 3.5-inches in diameter and the sides of the hole between the concrete hole and the piping were sealed with plumbers' putty. Photographs of the initial PFE test are presented as Attachment C.

Vacuum readings above -0.004 inches of water were observed within the FLC lease space, Julie Nails & Spa to the south, and the north adjoining unit. The readings within the Piggly Wiggly space were 0.00 inches of water indicating the VMS was not pulling a vacuum at that location which may be due to a foundation wall within the anchor tenant space (Piggly Wiggly).

The vapor mitigation system was constructed of 3-inch inner diameter Schedule 40 PVC pipe with a "Radon Away" GP-501 Series intake suction fan which is present on the exterior of the building by Radon Remedy on June 29, 2021. Photographs of the installation are presented as Attachment C.

In addition to the five sub-slab vapor ports (VP-1 through VP-5) installed between 2019 and 2020, on April 14, 2022, four PFE ports were installed with three within the FLC unit (PF-1 through PF-3) and one within the Julie Nails and Spa unit (PF-4).

One initial round of PFE testing was performed on April 14, 2022, and a second round of testing was performed approximately two months later on June 10, 2022. Results are presented on Figure 6 and are summarized on Table 4.

The results of the two initial readings of PFE test at PF-1 and PF-2 were at or above -0.004 inches of water and are within the area of CVOC impacted soil. The PFE test at PF-3 were below -0.004 and not within the area of impacted soil. In addition, it was the furthest PFE test location from the VMS. The PFE readings at PF-4 within the Julie Nails & Spa unit were slightly above and below -0.004 inches of water.

COMMISSIONING PLAN

The performance goals for the FLC and other adjacent units (if necessary) are the following:

- 1) Demonstrate a sub-slab depressurization of at least -0.004 inches of water under the entire ground floor slab where vapors exceeding VRSLs were determined to be present.
- 2) Demonstrate there are no indoor air exceedances of VALs.
- 3) Demonstrate that the ground floor slab acts as a barrier.

To do so, the following commissioning actions will be performed for the first round in accordance with Appendix D of WDNR Publication RR-800 “Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin”, dated January 2018.

- 1) The existing sub-slab depressurization system (SSDS) fan has been operating since its installation on June 29, 2021. The system will be checked 48 hours prior to PFE measurements.
- 2) The units will be sealed as best possible 4 hours prior to indoor air sampling. Sampling locations are shown on Figure 7.
- 3) The floors are finished within the Paladin Protection Academy (Unit 7532), FastSigns (Unit 7536), Julie Nails & Spa (Unit 7540), and Piggly Wiggly (Unit 7600); however, the Garage/Storage area has an unfinished concrete floor. If concrete cracks and/or open joints are observed, smoke testing methods will be used to determine if air is being drawn into the sub-slab. If so, infiltration areas will be sealed to prevent further infiltration.
- 4) Three sub-slab vapor pins will be installed to collect sub-slab vapor samples as shown on Figure 7, and results will be compared to the VRSLs. Samples will be collected for a 30-minute time frame utilizing 1.4-liter summa canisters and analyzed for the seven CVOCs identified above.
- 5) Six additional PFE test vapor pins will be installed to check the effectiveness of the existing SSDS as shown on Figure 7.
- 6) Five indoor air samples will be collected and analyzed for the seven CVOCs identified above and as shown on Figure 7, and results will be compared to the VALs. Samples will be collected for a 24-hour time frame utilizing 1.4-liter summa canisters and results. These indoor air samples will be collected for just under a which will be analyzed for the seven CVOCs identified above.
- 7) Following installation of the vapor pins, vacuum measurements will be performed using a digital micro-manometer (Infiltec; Model: DM1). Readings will be recorded and compared to the standard of -0.004 inches of water. If all points do not meet the vacuum goal, modifications will be made to the existing VMS including 1.) installing larger fans, 2.) adding additional extraction points, and/or 3.) improving the barrier seal.
- 8) Base line vacuum conditions are documented as shown on Tables 3 and 4 and on Figures 4 and 5.

DOCUMENTATION and SCHEDULE

Following completion of each round of commissioning, a report documenting the findings will be submitted to the WDNR. The first round of commissioning is anticipated to be performed in December 2023 (following a WDNR response to this plan).

An operations and maintenance plan will be submitted with the first-round commissioning report and modified as necessary based on other rounds of sampling.

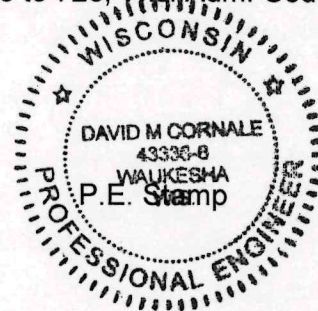
The second-round of commissioning is anticipated to be performed in March/April 2024 and the third-round of commissioning is anticipated to be performed in June/July 2024.

SUBMITTAL CERTIFICATION

I David M. Cornale, hereby, certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in the document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.



Signature, title and P.E. number
Senior Geotechnical Consultant, #43338-8



CLOSING

A Technical Assistance Request (Form 4400-237) is included as Attachment D and a \$700 review fee is attached for review of this VMS Commissioning Plan.

If there are any questions regarding the information contained herein, please contact the undersigned at your convenience.

Sincerely,

GILES ENGINEERING ASSOCIATES, INC.



Daniel K. Pelczar, P.G., C.P.G.
Senior Project Manager



Michelle L. Peed, P.G.
Senior Project Manager



David M. Cornale, P.E.
Senior Geotechnical Consultant

FIGURES

- | | |
|----------|--|
| Figure 1 | Site Location Map |
| Figure 2 | Overall Site Map |
| Figure 3 | Detailed Site Map |
| Figure 4 | Vapor Intrusion Map with Results |
| Figure 5 | Initial Pressure Field Extension Test (Shop Vac) |
| Figure 6 | Pressure Field Extension Test (Post-System) |
| Figure 7 | Proposed Sub-Slab Vapor, Indoor Air and Pressure Field Extension Point Locations |

TABLES

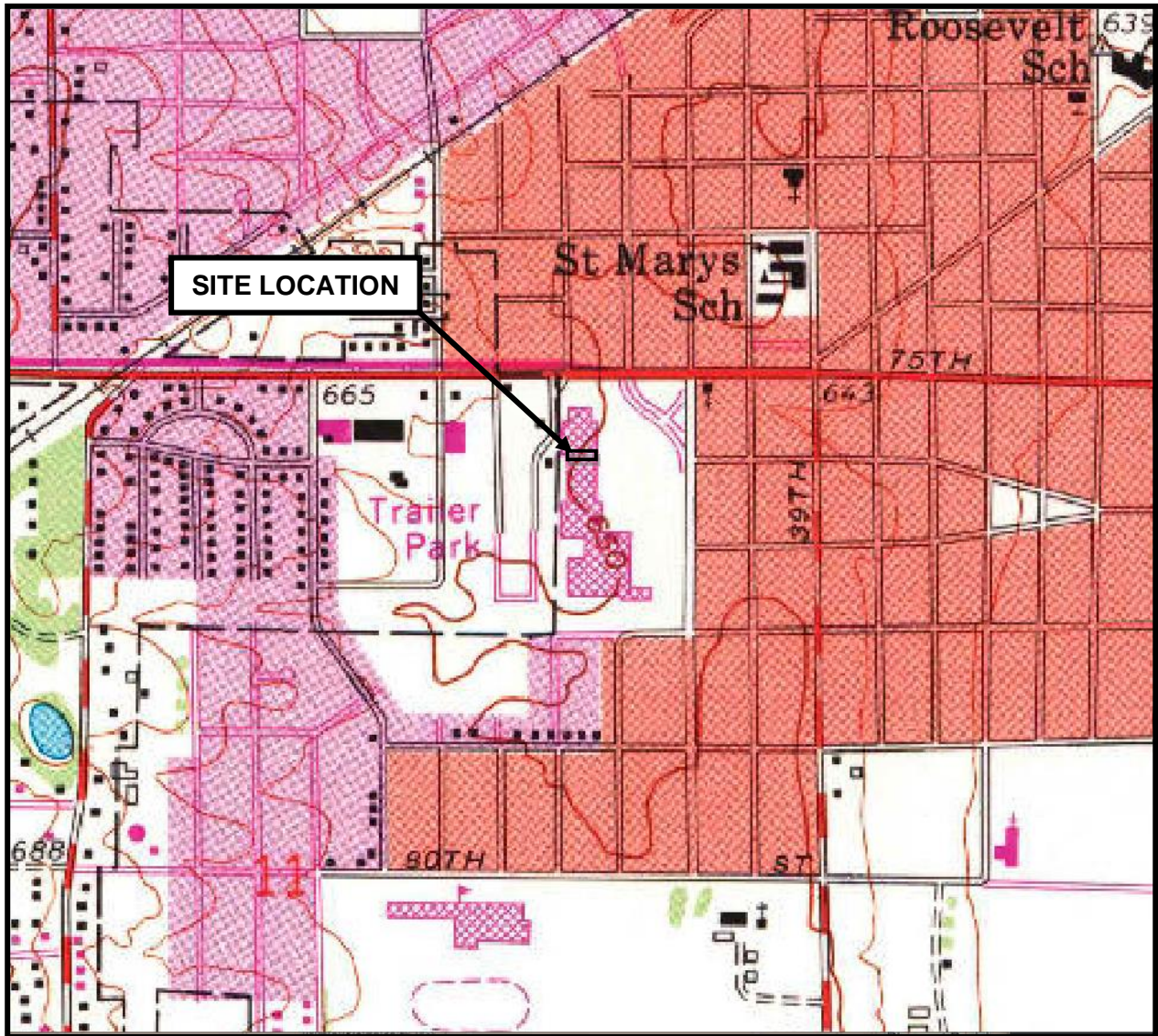
Table 1	Sub-Slab Vapor Analytical Results
Table 2	Indoor Air Analytical Results
Table 3	Initial Field Extension Test Results
Table 4	Post-System Field Extension Test Results

ATTACHMENTS

Attachment A	WDNR Letter dated September 16, 2022
Attachment B	Indoor Air and Sub-Slab Vapor Analytical Results
Attachment C	Various Photographs of Pressure Field Extension Test and of the Vapor Mitigation System
Attachment D	Technical Assistance Request (Form 4400-237)

Distribution: Wisconsin Department of Natural Resources
Attn: Mr. Paul Grittner (1 via email: paul.grittner@wisconsin.gov)
Jomblee, Inc.
Attn: Mr. Robert Reuschlein (1 via email: bobreuschlein@gmail.com)
KRT, LLC
Attn: Ms. Carlee Beier (1 via email: cbeier@ener-con.com)
Ms. Alicia Hurst Alexander (1 via email: ahurst@ener-con.com)

FIGURES



Source: USGS *Kenosha, Wisconsin* 7.5-Minute Series (topographic) Quadrangle Map (1958, revised 1971)

Scale: 1:24,000
 Contour Interval: 10 Feet



FIGURE 1

SITE LOCATION MAP

Pershing Plaza Shopping Center

**Former Lakeside Cleaners
 7536 Pershing Boulevard
 Kenosha, Wisconsin
 Project No. 1E-1902007**



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 ENGINEERING ASSOCIATES, INC.




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 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118
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FIGURE 2
OVERALL SITE MAP
PERSHING PLAZA SHOPPING CENTER
(FORMER LAKESIDE CLEANERS)
7536 PERSHING BOULEVARD
KENOSHA, WISCONSIN



APPROXIMATE SCALE



NOTES:

- 1.) BASE MAP DEVELOPED FROM A 2018 AERIAL.

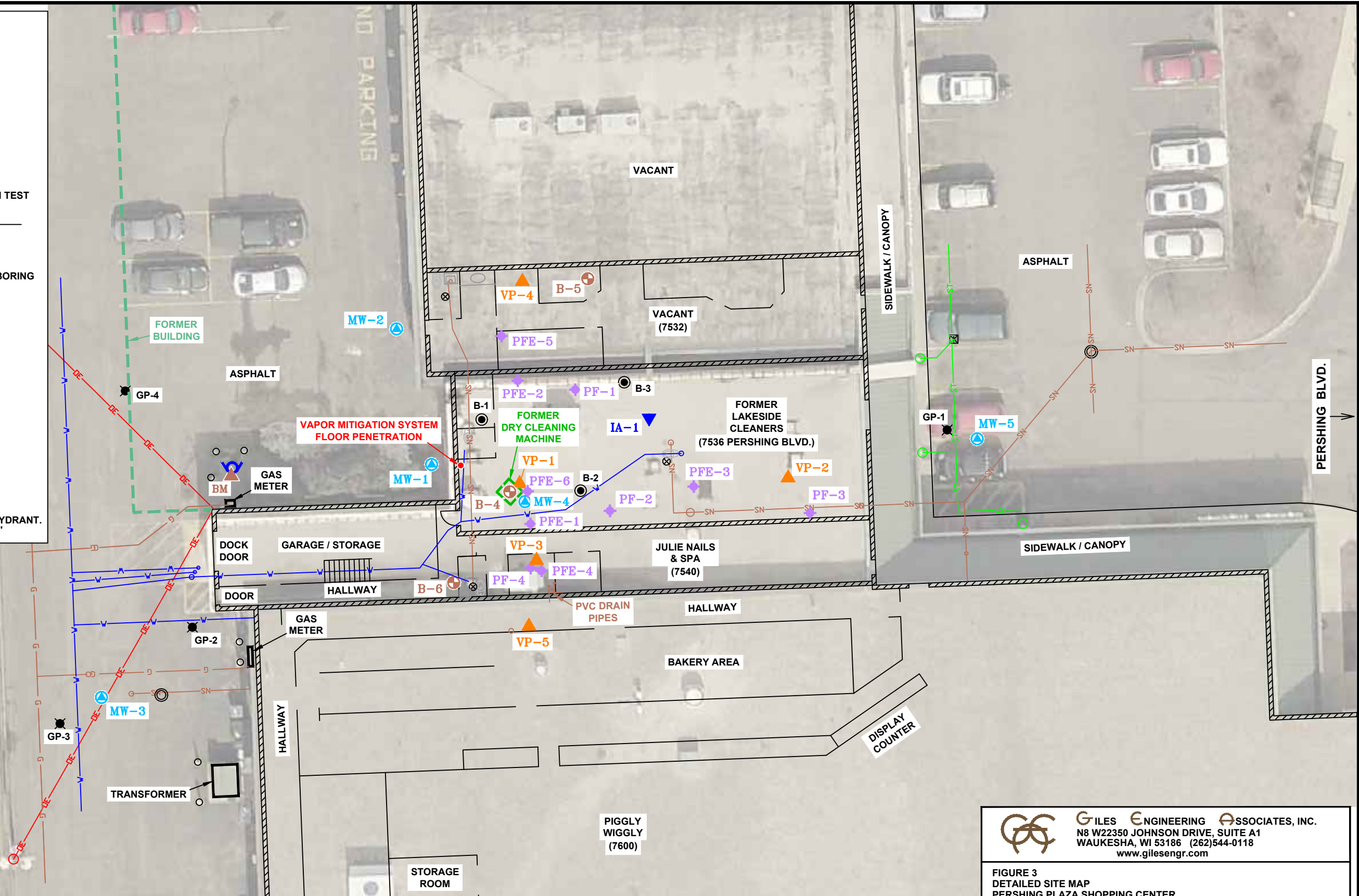
DESIGNED	DRAWN	SCALE	DATE	REVISED
SMO	<i>JLid</i>	approx. 1'=140'	08-19-19	--
PROJECT NO.: 1E-1902007			CAD No. 1E1902007A	

LEGEND:

- MW-1 GROUNDWATER MONITORING WELL
- VP-1 SUB-SLAB VAPOR POINT
- IA-1 INDOOR AIR SAMPLE
- B-4 SOIL BORING
- PF PFE PRESSURE FIELD EXTENSION TEST (SUB-SLAB)

- B-1 PREVIOUS HAND AUGER (BY SIGMA GROUP)
- GP-1 PREVIOUS GEOPROBE SOIL BORING (BY SIGMA GROUP)
- FIRE HYDRANT
- CATCH BASIN
- MANHOLE
- ELECTRIC POLE
- OVERHEAD ELECTRIC LINE
- GAS LINE
- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- FLOOR DRAIN
- BENCHMARK: TOP OF FIRE HYDRANT. ASSUMED ELEVATION = 100.0'

APPROXIMATE SCALE



NOTES:



















1.) EXISTING FEATURES ARE APPROXIMATE BASED ON AERIAL PHOTOGRAPHY AND FIELD OBSERVATIONS.

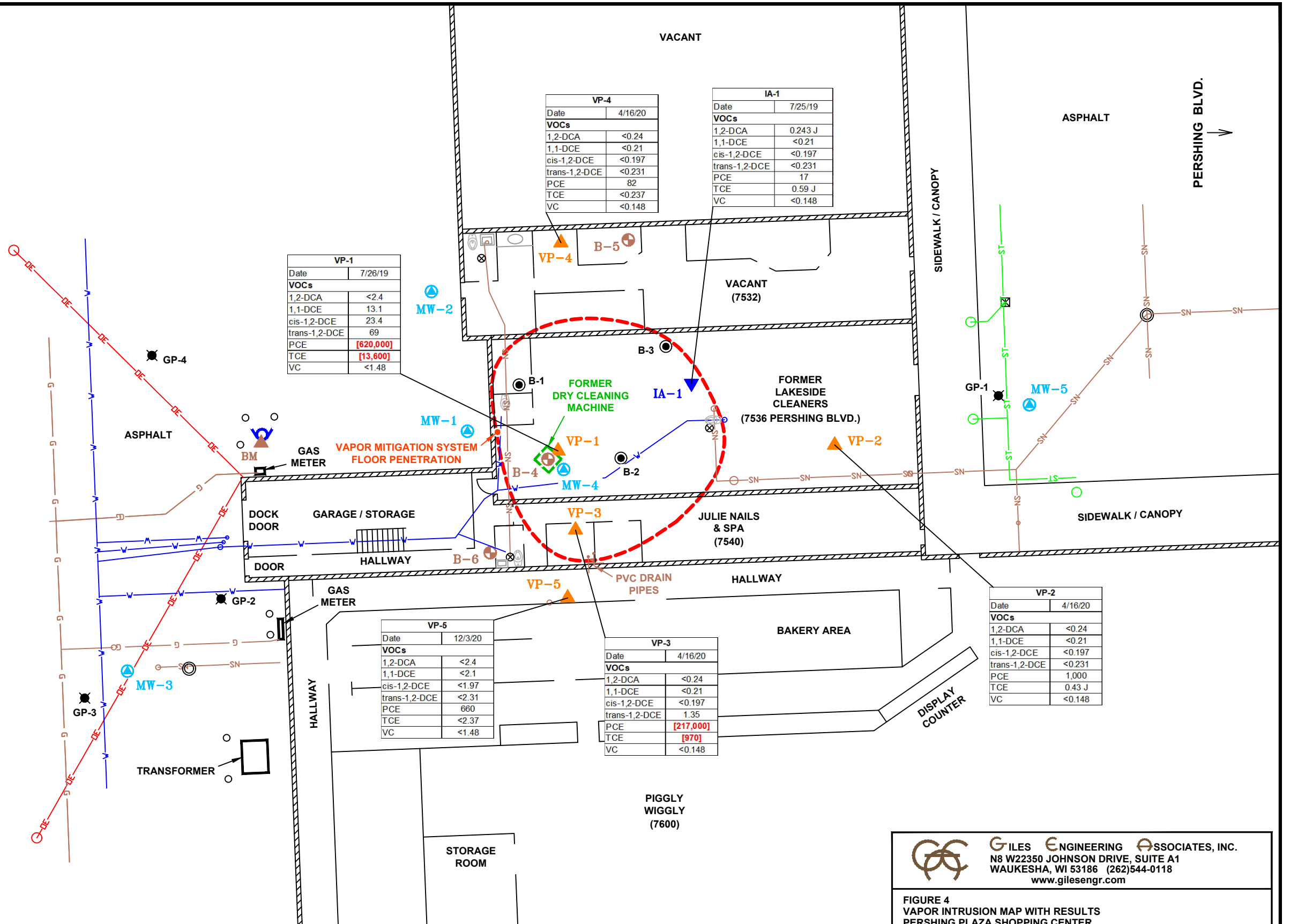
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FIGURE 3
 DETAILED SITE MAP
 PERSHING PLAZA SHOPPING CENTER
 (FORMER LAKESIDE CLEANERS)
 7536 PERSHING BOULEVARD
 KENOSHA, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
SMO/KMH	<i>Jed</i>	approx. 1"=20'	10-08-19	10-05-23
PROJECT NO.: 1E-1902007			CAD No. 1E1902007C6	

LEGEND:

	ESTIMATED EXTENT OF SUB-SLAB SOIL GAS EXCEEDING VRSL (LARGE COMMERCIAL / INDUSTRIAL)
	GROUNDWATER MONITORING WELL
	SUB-SLAB VAPOR POINT
	INDOOR AIR SAMPLE
	SOIL BORING
	PREVIOUS HAND AUGER (BY SIGMA GROUP)
	PREVIOUS GEOPROBE SOIL BORING (BY SIGMA GROUP)
	FIRE HYDRANT
	CATCH BASIN
	MANHOLE
	ELECTRIC POLE
	OVERHEAD ELECTRIC LINE
	GAS LINE
	WATER LINE
	SANITARY SEWER LINE
	STORM SEWER LINE
	FLOOR DRAIN
	BENCHMARK: TOP OF FIRE HYDRANT. ASSUMED ELEVATION = 100.0'



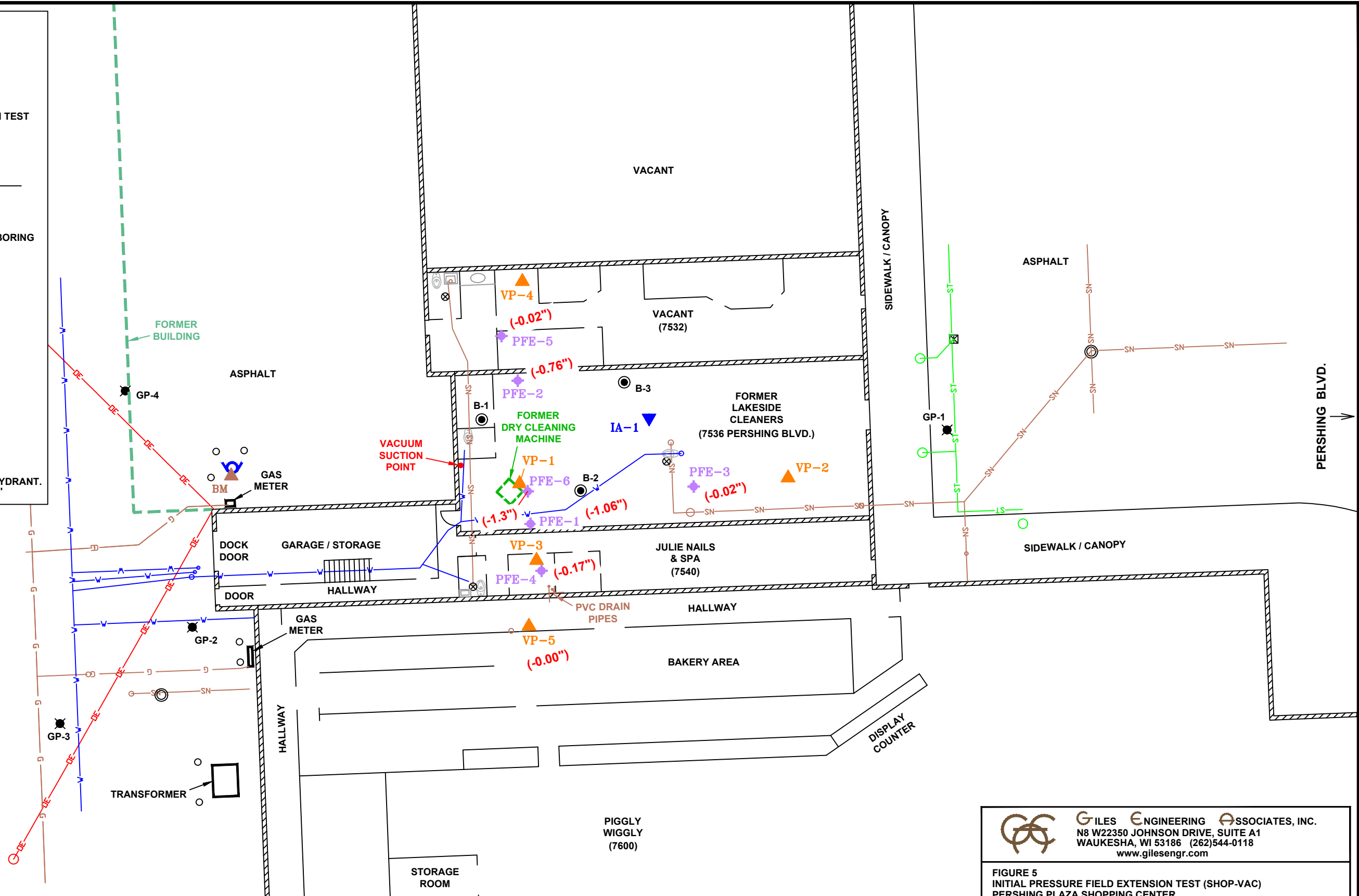
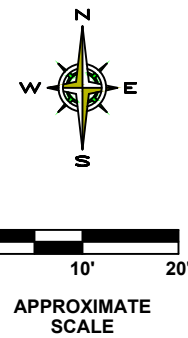
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FIGURE 4
 VAPOR INTRUSION MAP WITH RESULTS
 PERSHING PLAZA SHOPPING CENTER
 (FORMER LAKESIDE CLEANERS)
 7536 PERSHING BOULEVARD
 KENOSHA, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KMH	<i>Jed</i>	approx. 1"=20'	09-22-23	--

PROJECT NO.: 1E-1902007 CAD No. 1E1902007W

- LEGEND:**
- ▲ VP-1 SUB-SLAB VAPOR POINT
 - ▼ IA-1 INDOOR AIR SAMPLE
 - ◆ PFE PRESSURE FIELD EXTENSION TEST (SUB-SLAB)
 - (-1.06") PRESSURE TEST READING (INCHES OF WATER)
-
- B-1 PREVIOUS HAND AUGER (BY SIGMA GROUP)
 - ⊗ GP-1 PREVIOUS GEOPROBE SOIL BORING (BY SIGMA GROUP)
 - ⊕ FIRE HYDRANT
 - ⊠ CATCH BASIN
 - ⊙ MANHOLE
 - ELECTRIC POLE
 - DE OVERHEAD ELECTRIC LINE
 - G GAS LINE
 - W WATER LINE
 - SN SANITARY SEWER LINE
 - ST STORM SEWER LINE
 - ⊗ FLOOR DRAIN
 - ▲ BM BENCHMARK: TOP OF FIRE HYDRANT. ASSUMED ELEVATION = 100.0'



NOTES:

1.) EXISTING FEATURES ARE APPROXIMATE BASED ON AERIAL PHOTOGRAPHY AND FIELD OBSERVATIONS.

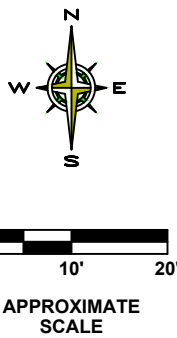
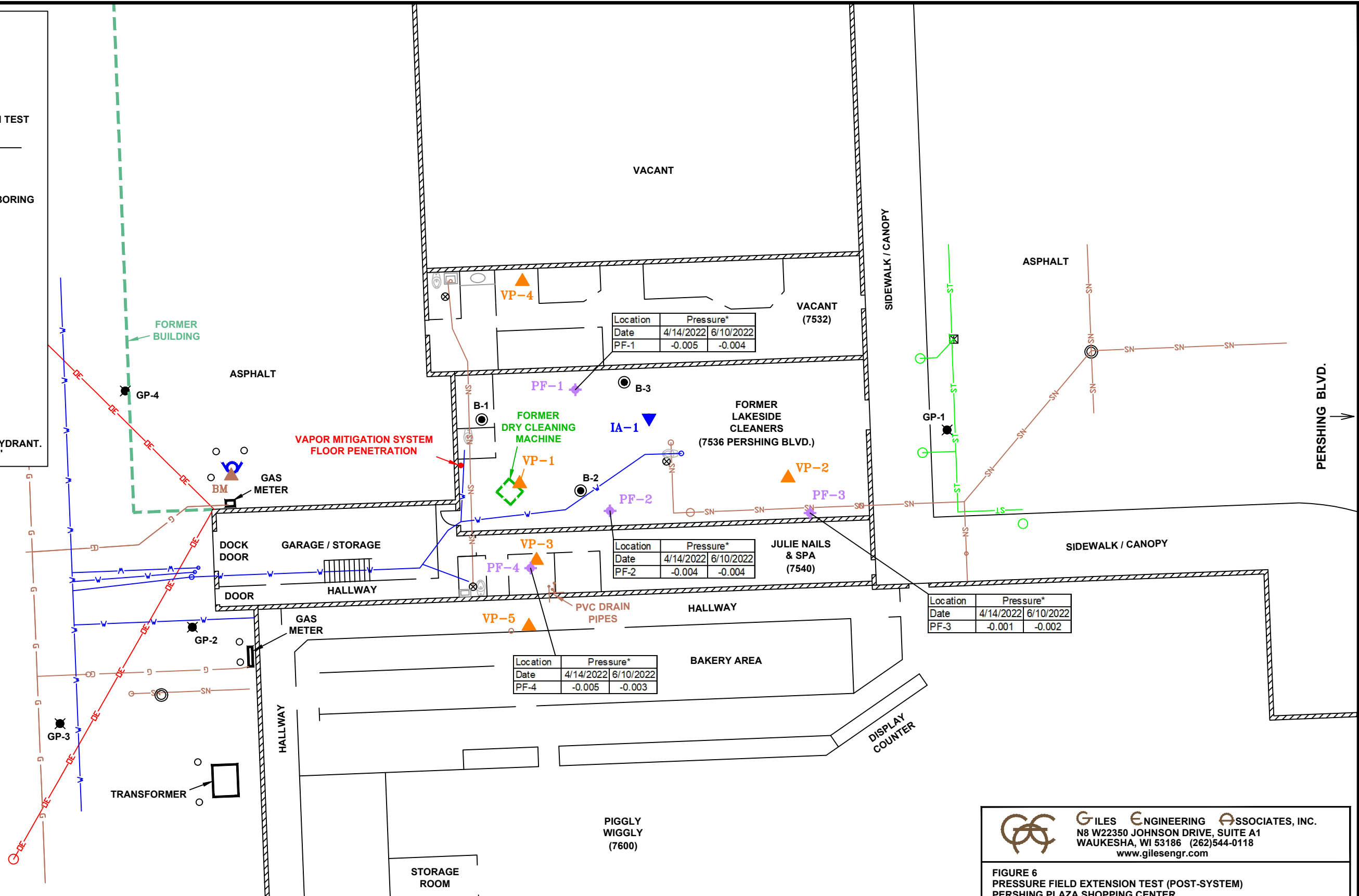
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FIGURE 5
 INITIAL PRESSURE FIELD EXTENSION TEST (SHOP-VAC)
 PERSHING PLAZA SHOPPING CENTER
 (FORMER LAKESIDE CLEANERS)
 7536 PERSHING BOULEVARD
 KENOSHA, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
SMO/KMH	<i>Jed</i>	approx. 1"=20'	09-22-23	--
PROJECT NO.: 1E-1902007			CAD No. 1E1902007Z	

LEGEND:

	SUB-SLAB VAPOR POINT
	INDOOR AIR SAMPLE
	PRESSURE FIELD EXTENSION TEST (SUB-SLAB)
<hr/>	
	PREVIOUS HAND AUGER (BY SIGMA GROUP)
	PREVIOUS GEOPROBE SOIL BORING (BY SIGMA GROUP)
	FIRE HYDRANT
	CATCH BASIN
	MANHOLE
	ELECTRIC POLE
	OVERHEAD ELECTRIC LINE
	GAS LINE
	WATER LINE
	SANITARY SEWER LINE
	STORM SEWER LINE
	FLOOR DRAIN
	BENCHMARK: TOP OF FIRE HYDRANT. ASSUMED ELEVATION = 100.0'



NOTES:
 1.) EXISTING FEATURES ARE APPROXIMATE BASED ON AERIAL PHOTOGRAPHY AND FIELD OBSERVATIONS.

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FIGURE 6
 PRESSURE FIELD EXTENSION TEST (POST-SYSTEM)
 PERSHING PLAZA SHOPPING CENTER
 (FORMER LAKESIDE CLEANERS)
 7536 PERSHING BOULEVARD
 KENOSHA, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
SMO/KMH	<i>Jed</i>	approx. 1"=20'	10-05-23	--
PROJECT NO.: 1E-1902007			CAD No. 1E1902007Y	

LEGEND:

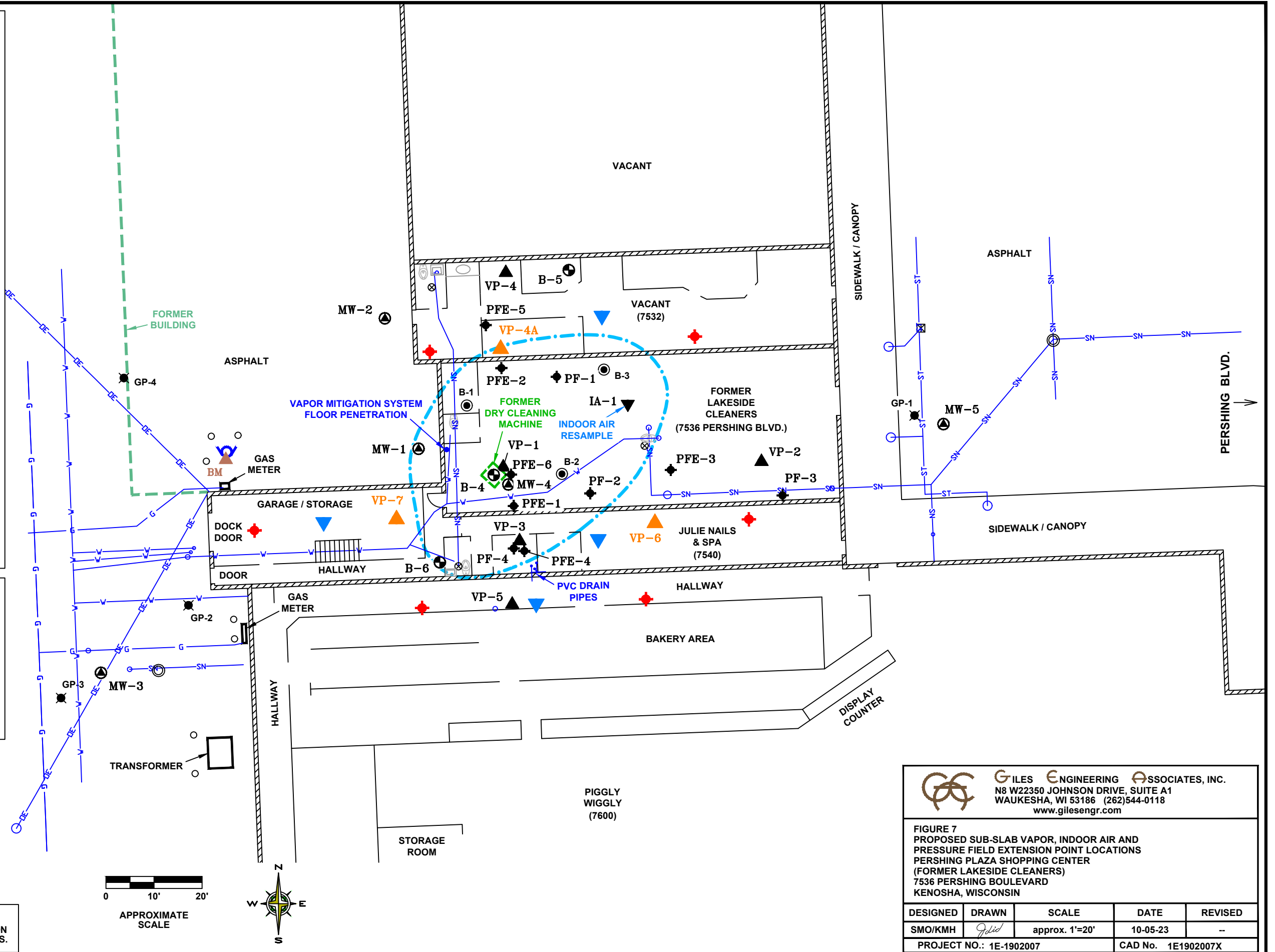
- ESTIMATED EXTENT OF IMPACTED SOIL EXCEEDING NR 720 RCLs FOR SOIL TO GROUNDWATER PATHWAY
- GROUNDWATER MONITORING WELL
- SUB-SLAB VAPOR POINT
- INDOOR AIR SAMPLE
- SOIL BORING
- PRESSURE FIELD EXTENSION TEST (SUB-SLAB)

- PREVIOUS HAND AUGER (BY SIGMA GROUP)
- PREVIOUS GEOPROBE SOIL BORING (BY SIGMA GROUP)
- FIRE HYDRANT
- CATCH BASIN
- MANHOLE
- ELECTRIC POLE
- OVERHEAD ELECTRIC LINE
- GAS LINE
- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- FLOOR DRAIN
- BENCHMARK: TOP OF FIRE HYDRANT. ASSUMED ELEVATION = 100.0'

PROPOSED KEY:

- PROPOSED SUB-SLAB VAPOR POINT (QTY: 3)
- PROPOSED INDOOR AIR SAMPLE (QTY: 5)
- PROPOSED PRESSURE FIELD EXTENSION TEST (SUB-SLAB) (QTY: 6)

NOTES:
 1.) EXISTING FEATURES ARE APPROXIMATE BASED ON AERIAL PHOTOGRAPHY AND FIELD OBSERVATIONS.



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FIGURE 7
 PROPOSED SUB-SLAB VAPOR, INDOOR AIR AND PRESSURE FIELD EXTENSION POINT LOCATIONS
 PERSHING PLAZA SHOPPING CENTER
 (FORMER LAKESIDE CLEANERS)
 7536 PERSHING BOULEVARD
 KENOSHA, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
SMO/KMH	<i>Jed</i>	approx. 1"=20'	10-05-23	--
PROJECT NO.: 1E-1902007			CAD No. 1E1902007X	

TABLES

TABLE 1
SUB-SLAB VAPOR ANALYTICAL RESULTS

Pershing Plaza Shopping Center
(Former Lakeside Cleaners Lease Space)
7536 Pershing Boulevard
Kenosha, Wisconsin
Project Number 1E-1902007

Sample Locations (Feet/Direction to Former DCM)	Former Dry Cleaners		Julie Nails	North Adjoining	Piggly Wiggly	Sub-Slab Vapor VRSL [^] (µg/m ³)		
	VP-1 (At Former DCM)	VP-2 (55' E)	VP-3 (10' S)	VP-4 (40' N)	VP-5 (25' S)	Land Use		
Sample Date	7/26/19	4/16/20	4/16/20	4/16/20	12/3/20	Residential	Small Commercial	Large Commercial / Industrial
Select VOCs (µg/m³)								
1,2-Dichloroethane	<2.4	<0.24	<0.24	<0.24	<2.4	36	160	470
1,1-Dichloroethene	13.1	<0.21	<0.21	<0.21	<2.1	7,000	29,000	88,000
1,2-Dichloroethene, cis-	23.4	<0.197	<0.197	<0.197	<1.97	1,400	5,800	18,000
1,2-Dichloroethene, trans-	69	<0.231	1.35	<0.231	<2.31	1,400	5,800	18,000
Tetrachloroethene (PCE)	[620,000]	1,000	[217,000]	82	660	1,400	5,800	18,000
Trichloroethene (TCE)	[13,600]	0.43 J	[970]	<0.237	<2.37	70	290	880
Vinyl Chloride	<1.48	<0.148	<0.148	<0.148	<1.48	56	930	2,800

Notes:

VRSL: Vapor Risk Screening Level

VOCs: Volatile Organic Compounds

µg/m³: Micrograms per cubic meter

J: Concentration reported between the laboratory method detection limit and the reporting limit.

[xx.x]: Result exceeds the sub-slab VRSL for Large Commercial/Industrial land uses

[^]VRSLs were obtained/calculated from the Wisconsin Vapor Quick Look-Up Table dated August 2023. VRSLs are based on a Target Risk for Carcinogens of 1×10^{-5} and a Target Hazard Quotient for Non-Carcinogens of 1.

TABLE 2
INDOOR AIR ANALYTICAL RESULTS

Pershing Plaza Shopping Center
(Former Lakeside Cleaners Lease Space)
7536 Pershing Boulevard
Kenosha, Wisconsin
Project Number 1E-1902007

Sample Location	Former Dry Cleaners	Indoor Air VAL [^] (µg/m ³)		
		Land Use		
Sample Name	IA-1	Residential	Small Commercial	Large Commercial / Industrial
Sample Date	7/25/19			
Select VOCs (µg/m³)				
1,2-Dichloroethane	0.243 J	1.1	4.7	4.7
1,1-Dichloroethene	<0.21	210	880	880
1,2-Dichloroethene, cis-	<0.197	42	180	180
1,2-Dichloroethene, trans-	<0.231	42	180	180
Tetrachloroethene (PCE)	17	42	180	180
Trichloroethene (TCE)	0.59 J	2.1	8.8	8.8
Vinyl Chloride	<0.148	1.7	28	28

Notes:

VAL: Vapor Action Level

VOCs: Volatile Organic Compounds

µg/m³: Micrograms per cubic meter

J: Concentration reported between the laboratory method detection limit and the reporting limit.
The indoor air sample was collected over 24 hours beginning at 9 am on 7/25/19

[^]VALs were obtained from the Wisconsin Vapor Quick Look-Up Table dated August 2023.

TABLE 3
INITIAL FIELD EXTENSION TEST RESULTS

Pershing Plaza Shopping Center
(Former Lakeside Cleaners Lease Space)
7536 Pershing Boulevard
Kenosha, Wisconsin
Project Number 1E-1902007

Location	Pressure (inches of water)	Business (Address)	Location / Distance from Extraction Point
Extraction Point	NM	Former Lakeside Cleaners (7536 Pershing Blvd)	Along west wall in the main room / 0'
PFE-1	-1.06	Former Lakeside Cleaners (7536 Pershing Blvd)	Along south wall in main room / 18'
PFE-2	-0.76	Former Lakeside Cleaners (7536 Pershing Blvd)	Along north wall in main room / 21'
PFE-3	-0.02	Former Lakeside Cleaners (7536 Pershing Blvd)	Central south area of main room / 47'
PFE-4	-0.17	Julie Nails and Spa (7540 Pershing Blvd)	Adjacent to VP-3 (sub-slab sample location) in break room / 23'
PFE-5	-0.02	Adjacent Vacant Unit to North (7532 Pershing Blvd)	Northwest corner of room along south wall / 23'
PFE-6	-1.30	Former Lakeside Cleaners (7536 Pershing Blvd)	Adjacent to east side of former dry cleaning machine / 12'
VP-5	0.00	Piggly Wiggly Grocery Store (7600 Pershing Blvd)	Sub-slab vapor point in north hallway / 35'

Notes:

Field extension testing conducted by a Radon Remedy's subcontractor (Rick Drew of Allis Environmental, Services, LLC)
Dwyer Series 475 Mark III hand-held manometer was used.

TABLE 4
POST-SYSTEM FIELD EXTENSION TEST RESULTS

Pershing Plaza Shopping Center
 (Former Lakeside Cleaners Lease Space)
 7536 Pershing Boulevard
 Kenosha, Wisconsin
 Project Number 1E-1902007

Location (feet/direction from extraction point)		Pressure (inches of water)	
		4/14/2022	6/10/2022
Former Lakeside Cleaners	PF-1 (25' northwest)	-0.005	-0.004
	PF-2 (35' east)	-0.004	-0.004
	PF-3 (65' east)	-0.001	-0.002
Julie Nails and Spa	PF-4 (20' southeast)	-0.005	-0.003

Notes:

The pressure readings were made with a Infiltec; Model: DM1 hand-held micro-manometer, and are reported in inches of water column.

The sub-slab depressurization system extraction point is located along the south wall of the Former Lakeside Cleaners lease space, approximately 7 feet west of the former dry cleaning machine.

ATTACHMENT A

WDNR Letter dated September 16, 2022



September 16, 2022

Mr. Robert Reuschlein
Jomblee, Inc.
4930 Ascot Lane
Madison, WI 53711
Email only to: bobreuschlein@gmail.com

Subject: Review of information provided in “Request for Technical Assistance Meeting”
Pershing Plaza Shopping Center, 7536 Pershing Boulevard, Kenosha
DNR BRRTS Activity #: 02-30-582211; FID #: 230007690

Dear Mr. Reuschlein:

The Department of Natural Resources (DNR) has completed its review of the June 28, 2022 “Request for Technical Assistance Meeting” (the Request) submitted for the Arctic Laundry & Cleaners site. The Request summarizes field investigation activities conducted to investigate chlorinated volatile organic compound (CVOC) contamination resulting from spills of tetrachloroethene (PCE) caused by a tenant that operated as a dry-cleaner. These field activities included advancing soil borings, installing groundwater monitoring wells, and collecting soil, groundwater, air, and sub-slab vapor samples. A sub-slab mitigation system was installed at the space formerly occupied by the drycleaner. The Request concluded that the site investigation is now complete and that conducting a remedial action to address residual contamination is not practicable at this time. DNR concurrence with these conclusions was requested.

The DNR reviewed the information presented in the Request and the case file and determined that further work must be conducted before a request for case closure could be submitted. Groundwater sampling is needed to define the extent of PFAS contamination, additional information must be provided to demonstrate that sub-slab depressurization system is operating as expected, and sub-slab vapor sampling is needed beyond the area influenced by the depressurization system to assess risk. Additionally, options for completing a remedial action to reduce the source of vapor contamination must be presented. This letter provides details regarding these items.

Soil Contamination

Additional soil sampling is not required to complete the site investigation. The estimated extent of soil contamination depicted on figures should be expanded closer to boring locations where clean samples were collected to provide adequate notice to future excavators on the potential for contamination.

Groundwater Contamination

Additional groundwater samples must be collected from MW-4 for PFAS analysis to confirm the presence of these contaminants at this site and to assess plume stability. Further groundwater sampling must also be completed to define the degree and extent of PFAS contamination. At this time, additional sampling to investigate CVOC contamination in groundwater is not required.

Vapor Contamination

Documentation of the construction and commissioning of the sub-slab depressurization system (SSDS) must be provided. This must include a description of how the pressure field extension (PFE) of the SSDS was evaluated and an assessment as to whether indoor air samples in the 7536 and 7540 tenant spaces are needed to confirm that the SSDS is operating effectively. See DNR guidance document RR-800, "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin" for information on commissioning these systems.

In tenant spaces in which an applicable VRSL has been exceeded (7536 and 7540), it must be confirmed that the PFE of the SSDS extends across the entire footprint of the tenant space. If the PFE does not extend across the entire footprint of the tenant space, a minimum of two additional sub-slab vapor samples must be collected from the areas where PFE does not extend to confirm that contamination does not remain outside of the system's area of influence.

Tenant spaces 7532 and 7600 did not have applicable VRSL exceedances for their first round of sub-slab vapor sampling. A minimum of two total rounds of sub-slab vapor sampling are needed to confirm that applicable VRSLs are not exceeded in these spaces. Additionally, sample port VP-4 is not positioned in a location where sampling would rule out a vapor risk to the 7532 tenant space. To demonstrate that these tenant spaces are not at risk for vapor intrusion, conduct the following activities:

- Install an additional vapor sampling port near the southern wall of the 7532 unit to confirm that contaminated vapors are not migrating under this tenant space. A minimum of two rounds of sub-slab vapor sampling must be conducted at this new location.
 - Conducting one or more rounds of sub-slab sampling at VP-4 should be considered if vapor contamination is confirmed at this new location.
- Conduct a minimum of one additional round of sub-slab vapor sampling at VP-5 to confirm that vapor contamination remains below applicable VRSLs.

Completion of the site investigation may require the collection of soil vapor and/or indoor air samples in the garage / storage area. Describe the layout of this area, specifically noting if portions of the garage have been dug down to form a lower area or if there are any elevated areas or an upper floor. Describe whether the SSDS's area of influence extends to this area. Providing photos of the interior would be helpful. Based on the layout of the area, the information obtained regarding the commissioning of the system, and the extent of known contamination in the area, propose whether indoor air or sub-slab vapor samples would need to be collected.

Identify where the sanitary sewer located west of the building (near MW-3) leads to and how it connects to the main utility line. As utilities transect areas of known contamination, and as contaminant concentrations measured in soil vapor are relatively high when compared to the vapor risk screening levels, the collection of one or more vapor samples within the sanitary should be collected to assess if this is a potential migration pathway.

Propose a Remedial Action

You must evaluate remedial options for reducing the risk of vapor intrusion at the on-site building to satisfy the requirement of Wis. Admin. Code § NR 726.05(8). The maintenance of an impervious barrier over residual soil contamination and operation of a sub-slab depressurization system is not considered a valid remedial action for this purpose as it does not reduce contaminant mass or the potential for vapor intrusion. The DNR requests you reevaluate potential remedial options, following the process outlined in Wis. Admin. Code § NR 722.07 and NR 722.09, to determine what could be a practicable means of reducing contamination impacting sub-slab vapors. The DNR must approve of the assessment and any actions taken before case closure can be requested. When evaluating proposed remedial actions the DNR will consider that that contaminated soil at this site is located at shallow depths and appears to be generally accessible.

Submittals to the DNR

A site investigation and remedial action options report must be submitted to document all field investigation activities conducted by the Sigma Group and Giles Engineering Associates (including any soil boring logs, well construction forms, or laboratory reports not previously submitted), describe the commissioning and construction of the sub-slab mitigation system, describe the results of environmental samples that will be collected, and provide a detailed analysis of potential remedial options. A review fee may be provided with this report if you would like the DNR to provide recommendations for completing the site investigation (if needed) or for taking next steps to complete this project.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this review or wish to discuss any of these requests in further detail, please contact me by calling (414) 405-0764, or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Kelly M. Hayden, Giles Engineering Associates – khayden@gilesengr.com

ATTACHMENT B

Indoor Air and Sub-Slab Vapor Analytical Results

Synergy Environmental Lab, INC

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

STEVE OWENS
GILES ENGINEERING
N8 W22350 JOHNSON DRIVE
WAUKESHA, WI 53186

Report Date 09-Aug-19

Project Name PERSHING PLAZA
Project # 1E-1902007

Invoice # E36546

Lab Code 5036546A
Sample ID IA-1
Sample Matrix Air
Sample Date 7/25/2019

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	0.243 "J"	ug/m3	0.24	0.763	1	TO-15		8/7/2019	CJR	1
1,1-Dichloroethene	< 0.21	ug/m3	0.21	0.668	1	TO-15		8/7/2019	CJR	1
cis-1,2-Dichloroethene	< 0.197	ug/m3	0.197	0.626	1	TO-15		8/7/2019	CJR	1
trans-1,2-Dichloroethene	< 0.231	ug/m3	0.231	0.734	1	TO-15		8/7/2019	CJR	1
Tetrachloroethene	17	ug/m3	0.278	0.884	1	TO-15		8/7/2019	CJR	1
Trichloroethene (TCE)	0.59 "J"	ug/m3	0.237	0.754	1	TO-15		8/7/2019	CJR	1
Vinyl Chloride	< 0.148	ug/m3	0.148	0.472	1	TO-15		8/7/2019	CJR	1

Lab Code 5036546B
Sample ID VP-1
Sample Matrix Air
Sample Date 7/26/2019

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	< 2.4	ug/m3	2.4	7.63	10	TO-15		8/7/2019	CJR	1
1,1-Dichloroethene	13.1	ug/m3	2.1	6.68	10	TO-15		8/7/2019	CJR	1
cis-1,2-Dichloroethene	23.4	ug/m3	1.97	6.26	10	TO-15		8/7/2019	CJR	1
trans-1,2-Dichloroethene	69	ug/m3	2.31	7.34	10	TO-15		8/7/2019	CJR	1
Tetrachloroethene	620000	ug/m3	778.4	2475.2	2800	TO-15		8/7/2019	CJR	1
Trichloroethene (TCE)	13600	ug/m3	663.6	2111.2	2800	TO-15		8/7/2019	CJR	1
Vinyl Chloride	< 1.48	ug/m3	1.48	4.72	10	TO-15		8/7/2019	CJR	1

Project Name PERSHING PLAZA
Project # 1E-1902007

Invoice # E36546

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

Code *Comment*

1 Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature



A handwritten signature in blue ink, appearing to read "Michael J. [unclear]", is written over a horizontal line.

Environmental Lab, Inc.

1990 Prospect Ct. • Appleton, WI 54914
920-830-2455 • FAX 920-733-0631

Sample Handling Request

Rush Analysis Date Required _____
(Rushes accepted only with prior authorization)

Normal Turn Around _____

Lab I.D. # _____
Account No.: _____ Quote No.: _____
Project #: **IE-1902007**
Sampler: (signature) *K7-Hey*

Project (Name / Location): **Pershing Plaza Kenosha WI**

Analysis Requested

Other Analysis

Reports To: **Steve Owens** Invoice To: _____
Company: **Giles Engineering** Company: _____
Address: **N 8 W22350 Johnson Dr** Address: _____
City State Zip: **Waukesha WI 53186** City State Zip: _____
Phone: **262-544-0118** Phone: _____
FAX: _____ FAX: _____

DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	LEAD	NITRATE/NITRITE	OIL & GREASE	PAH (EPA 8270)	PCB	PVOC (EPA 8021)	PVOC + NAPHTHALENE	SULFATE	TOTAL SUSPENDED SOLIDS	VOC DW (EPA 524.2)	VOC (EPA 8260) TD15 SeList	8-PCRA METALS	PID/FID
												<input checked="" type="checkbox"/>		
												<input checked="" type="checkbox"/>		

Lab I.D.	Sample I.D.	Collection Date Time	Comp	Grab	Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation
5036546 A	IA-1	7/25/19	*	X		1	Indoor Air	—
B	VP-1	7/26/19		X		1	Sub-slab	—

Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge etc.)
IA-1 24 hr indoor air sample started 900 on 7/25/19 (Pressure -29), stopped 7/26/19 900 (Pressure -3)
VP-1 Sub-slab soil gas sample started 940 (Pressure -28), stopped at 953 (Pressure -3) on 7/26/19
 Analyze IA-1 and VP-1 for the following VOCs (TD15): **PCE, TCE, Cis-1,2-DCE, trans-1,2-DCE, 1,1-DCE, 1,2-DCA, Vinyl Chloride**
 email report to: **Sowens@gilesengr.com and Khayden@gilesengr.com**

Sample Integrity - To be completed by receiving lab.

Method of Shipment: GC

Temp. of Temp. Blank _____ °C On Ice: _____

Cooler seal intact upon receipt: Yes _____ No

Relinquished By: (sign) _____ Time _____ Date _____ Received By: (sign) _____ Time _____ Date _____

K7-Hey 15:55 7/26/19

Received in Laboratory By: _____ Time: **10:00** Date: **7/27/19**

Synergy Environmental Lab, INC

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

STEVE OWENS
GILES ENGINEERING
N8 W22350 JOHNSON DRIVE
WAUKESHA, WI 53186

Report Date 30-Apr-20

Project Name PERSHING PLAZA
Project # 1E-1902007

Invoice # E37782

Lab Code 5037782A
Sample ID VP-2
Sample Matrix Air
Sample Date 4/16/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	< 0.24	ug/m3	0.24	0.763	1	TO-15		4/28/2020	CJR	1
1,1-Dichloroethene	< 0.21	ug/m3	0.21	0.667	1	TO-15		4/28/2020	CJR	1
cis-1,2-Dichloroethene	< 0.197	ug/m3	0.197	0.626	1	TO-15		4/28/2020	CJR	1
trans-1,2-Dichloroethene	< 0.231	ug/m3	0.231	0.734	1	TO-15		4/28/2020	CJR	1
Tetrachloroethene	1000	ug/m3	2.78	8.84	10	TO-15		4/29/2020	CJR	1
Trichloroethene (TCE)	0.43 "J"	ug/m3	0.237	0.754	1	TO-15		4/28/2020	CJR	1
Vinyl Chloride	< 0.148	ug/m3	0.148	0.472	1	TO-15		4/28/2020	CJR	1

Lab Code 5037782B
Sample ID VP-3
Sample Matrix Air
Sample Date 4/16/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	< 0.24	ug/m3	0.24	0.763	1	TO-15		4/28/2020	CJR	1
1,1-Dichloroethene	< 0.21	ug/m3	0.21	0.667	1	TO-15		4/28/2020	CJR	1
cis-1,2-Dichloroethene	< 0.197	ug/m3	0.197	0.626	1	TO-15		4/28/2020	CJR	1
trans-1,2-Dichloroethene	1.35	ug/m3	0.231	0.734	1	TO-15		4/28/2020	CJR	1
Tetrachloroethene	217000	ug/m3	695	2210	2500	TO-15		4/29/2020	CJR	1
Trichloroethene (TCE)	970	ug/m3	23.7	75.4	100	TO-15		4/29/2020	CJR	1
Vinyl Chloride	< 0.148	ug/m3	0.148	0.472	1	TO-15		4/28/2020	CJR	1

Project Name PERSHING PLAZA
Project # 1E-1902007

Invoice # E37782

Lab Code 5037782C
Sample ID VP-4
Sample Matrix Air
Sample Date 4/16/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	< 0.24	ug/m3	0.24	0.763	1	TO-15		4/28/2020	CJR	1
1,1-Dichloroethene	< 0.21	ug/m3	0.21	0.667	1	TO-15		4/28/2020	CJR	1
cis-1,2-Dichloroethene	< 0.197	ug/m3	0.197	0.626	1	TO-15		4/28/2020	CJR	1
trans-1,2-Dichloroethene	< 0.231	ug/m3	0.231	0.734	1	TO-15		4/28/2020	CJR	1
Tetrachloroethene	82	ug/m3	0.278	0.884	1	TO-15		4/29/2020	CJR	1
Trichloroethene (TCE)	< 0.237	ug/m3	0.237	0.754	1	TO-15		4/28/2020	CJR	1
Vinyl Chloride	< 0.148	ug/m3	0.148	0.472	1	TO-15		4/28/2020	CJR	1

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

<i>Code</i>	<i>Comment</i>
1	Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature



Lab I.D. #

QUOTE # :

Project #: 1E-1902007

Sampler: (signature) [Signature]

www.synergy-lab.net
 1990 Prospect Ct. • Appleton, WI 54914
 920-830-2455 • mrsynergy@wi.twcbc.com

Sample Handling Request

Rush Analysis Date Required: _____
 (Rushes accepted only with prior authorization)
 Normal Turn Around

Project (Name / Location): Pershing Plaza Kenosha, WI:

Reports To: Steve Owens Invoice To:

Company Giles Engineering Company

Address N8 W22350 Johnson Dr Address

City State Zip Waukesha, WI: City State Zip

Phone 262.544.0118 Phone

Email sowers@gilesenr.com Email

Analysis Requested

Other Analysis

Lab I.D.	Sample I.D.	Collection		Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation	DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	LEAD	NITRATE/NITRITE	OIL & GREASE	PAH (EPA 8270)	PCB	PVC (EPA 8021)	PVC + NAPHTHALENE	SULFATE	TOTAL SUSPENDED SOLIDS	VOC DW (EPA 524.2)	VOC (EPA 8260)	VOC AIR (TO - 15) <u>See List</u>	8-PCRA METALS	PID/ FID
		Date	Time																				
<u>5037782A</u>	<u>VP-2</u>	<u>4/16/20</u>		<u>N</u>	<u>1</u>	<u>Sub-slab</u>	<u>-</u>														<u>X</u>		
<u>B</u>	<u>VP-3</u>	<u>4/16/20</u>		<u>N</u>	<u>1</u>	<u>Sub-slab</u>	<u>-</u>														<u>X</u>		
<u>C</u>	<u>VP-4</u>	<u>4/16/20</u>		<u>N</u>	<u>1</u>	<u>Sub-slab</u>	<u>-</u>														<u>X</u>		

Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge, etc.)

Analyse TO-15 For: PCE, TCE, Cis-1,2-DCE, Trans-1,2-DCE, 1,1-DCE, 1,2-DCA, Vinyl Chloride

Sample ID	Pressure Start/stop	Time Start/stop
<u>VP-2</u>	<u>28" / 4" Hg</u>	<u>0852-0904</u>
<u>VP-3</u>	<u>29" / 4" Hg</u>	<u>0918-0929</u>
<u>VP-4</u>	<u>30" / 4" Hg</u>	<u>0847-0900</u>

email results to: sowers@gilesenr.com & jwoolste@gilesenr.com

Sample Integrity - To be completed by receiving lab.

Method of Shipment: GC

Temp. of Temp. Blank: _____ °C On Ice: _____

Cooler seal intact upon receipt: Yes No

Relinquished By: (sign) [Signature] Time 1220 Date 4/17/2020

Received By: (sign) [Signature] Time 1220 Date 4/17/20

Received in Laboratory By: [Signature] Time: 10:00 Date: 4/18/20

Synergy Environmental Lab, INC

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

STEVE OWENS
GILES ENGINEERING
N8 W22350 JOHNSON DRIVE
WAUKESHA, WI 53186

Report Date 14-Dec-20

Project Name PERSHING PLAZA
Project # 1E-1902007
Lab Code 5038865A
Sample ID VP-5
Sample Matrix Air
Sample Date 12/3/2020

Invoice # E38865

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
Air Samples										
1,2-Dichloroethane	< 2.4	ug/m3	2.4	7.6	10	TO-15			CJR	1
1,1-Dichloroethene	< 2.1	ug/m3	2.1	6.7	10	TO-15			CJR	1
cis-1,2-Dichloroethene	< 1.97	ug/m3	1.97	6.26	10	TO-15	12/8/2020		CJR	1
trans-1,2-Dichloroethene	< 2.31	ug/m3	2.31	7.34	10	TO-15	12/8/2020		CJR	1
Tetrachloroethene	660	ug/m3	2.78	8.84	10	TO-15	12/8/2020		CJR	1
Trichloroethene (TCE)	< 2.37	ug/m3	2.37	7.54	10	TO-15	12/8/2020		CJR	1
Vinyl Chloride	< 1.48	ug/m3	1.48	4.72	10	TO-15	12/8/2020		CJR	1

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

Code	Comment
1	Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature

ATTACHMENT C

**Various Photographs of Pressure Field Extension Test
and of the Vapor Mitigation System**



3.5" Extraction Hole with shop vac (same hole for VMS), viewing North.



Former location of Dry Cleaner Machine (Former Lakeside Cleaners) and PFE-6, viewing North

PHOTOGRAPHS
March 23, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



View of PFE- 1(FLC), viewing West.



View of PFE-2 (FLC), viewing West.

PHOTOGRAPHS
March 23, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



View of PFE-4 (Julie Nails & Spa), viewing down and North.



View of PFE-5 (Paladin Protection Academy), viewing West.

PHOTOGRAPHS
March 23, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



Interior lower piping for Vapor Mitigation System (VMS) (FLC), viewing North.

PHOTOGRAPHS
June 29, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



Interior upper piping for VMS (FLC), viewing North.

PHOTOGRAPHS
June 29, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



Interior completed VMS (FLC), viewing North.

PHOTOGRAPHS
June 29, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



Interior installed manometer on VMS piping (FLC), viewing West.



Exterior completed VMS piping with fan and electrical outlet (FLC), viewing East.

PHOTOGRAPHS
June 29, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.



Exterior completed VMS piping with fan (FLC), viewing Southeast.

PHOTOGRAPHS
June 29, 2021

Pershing Plaza Shopping Center
Former Lakeside Cleaners
7536 Pershing Boulevard
Kenosha, Wisconsin
Project No. 1E-1902007



GILES
ENGINEERING ASSOCIATES, INC.