



January 19, 2021

SPIC AND SPAN
ROBERT MILLER
4301 N. RICHARDS STREET
MILWAUKEE WI 53212

Subject: **Site Investigation Not Recommended- Additional Investigation Required**
Spic and Span, Inc. (FMR)
4301 N. Richards Street, Milwaukee, WI
DNR BRRTS # 02-41-585636 DNR FID # 241040690

Dear Mr. Miller:

On January 6, 2021, the Wisconsin Department of Natural Resources (DNR) reviewed the Site Investigation Report for the case identified above. The Site Investigation Report (SI Report) was prepared and submitted on your behalf by your consultant, Graef-USA (Graef). The Site Investigation Report was reviewed for compliance with the requirements in Wis. Admin. Code § NR 716.

Report Summary

In October 2019, two indoor air samples were collected at the former Spic and Span facility, 4301 N. Richards Street, Milwaukee, WI (Site) and Tetrachloroethene (PCE) was detected at concentrations up to 580 µg/m³. Based on the indoor air sample results, sub-slab vapor sampling was conducted. Two sub-slab samples, collected along a sanitary sewer, exceeded the large industrial Vapor Risk Screening Level (VRSL) with a maximum PCE concentration of 81,000 µg/m³. On April 3, 2020, the DNR was notified that sub-slab vapor contamination was detected at the Site. In May and August 2020, subsurface investigations were conducted at the Site to delineate the extent and degree of contamination. VOCs, including cis-1,2-Dichloroethene, PCE, Trichloroethene (TCE), Trimethylbenzenes, and Xylene were detected in soil samples exceeding concentrations above the NR 720 Protection of Groundwater Residual Contaminate Levels (RCLs), Non-industrial Direct Contact RCLs, and/or Industrial Direct Contact RCLs. The DNR received the Graef SI Report in October 2020. This report identified the need for further work at the Site.

Site Investigation Review

The Site Investigation Report was reviewed for compliance with Wis. Admin. Code § NR 716. The DNR has determined that additional actions and/or information is required to complete the site investigation as summarized below:

1. Site Investigation Scoping (Wis. Admin. § NR 716.07) requires an evaluation of the history of the facility, previous discharges, and uses on the Site that may be associated with discharges.

Contaminates of concern, identified in the soil at the Site, have not been evaluated and further discussion of the source is warranted. To complete the conceptual site model for how contamination was released, provide specific details of the source being investigated and how the impacts relate to the source. Include contaminate migration, areas of operation within the building (inside and outside of the former dry-cleaning room), and the relation to the former petroleum solvent tanks. Additionally, include an evaluation of historical releases at the property as it relates to the contaminants of concern.

2. 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.
 - a. Soil Pathway
 - Define the vertical and horizontal extent of soil contamination to the north, including deeper soil impacts in the area of the exterior hand boring.
 - Define the vertical and horizontal extent of soil impacts to the east, including impacts along the sanitary sewer line.
 - Define the vertical and horizontal extent of soil impact to the west of SB-8 and SB-9.
 - Define how soil exceedances correlate to the former processes at the facility.
 - b. Groundwater Pathway
 - The extent of groundwater contamination has not been investigated. Although groundwater was not encountered in temporary well SB-9, on-site groundwater levels were measured at 3-4 feet below ground surface (bgs) to the west of the building during the waste solvent tank investigation. Additionally, groundwater levels were measured at 12-15 feet bgs during site investigation activities on the adjacent property to the south. In order to evaluate groundwater contamination, we recommend that Wis. Admin. Code § NR 141 compliant monitoring wells be installed, and groundwater sampling and monitoring be conducted.
 - c. Vapor Pathway
 - As stated in your SI Report, although the indoor air samples exceeded the Indoor Air Vapor Action Level (VAL), the highest concentration was approximately 0.0033 of the 2019 OSHA 8-hr. TWA. However, OSHA standards apply to the source building only if the facility is actively operating with the chemical in use. Therefore, indoor air is compared to VALs due to a release to the environment and require investigation, mitigation, and remediation under the NR 700 Rule Series.
 - Your SI Report states that the source is limited and will continue to vent and naturally degrade over time, the overall mass of contamination and potential concentrations in the indoor air will continue to decrease. Vapors are not allowed to naturally attenuate. Due to the VRSL exceedance, mitigation and active remediation to reduce the mass and concentration of contamination is required (Wis. Admin. Code § NR 726.05(8)(b)). Since the building is currently vacant, mitigation and active remediation will be required prior to on-site occupancy.

- Indoor air samples exceeded the immediate action criteria for indoor air of non-carcinogenic compounds (3x the VAL). Since the building is currently vacant, immediate mitigation and active remediation will be required per Wis. Admin. Code § NR 708 prior to on-site occupancy.
 - Verify that the building is slab-on-grade with no basement or sump water concerns.
 - Based on the sub-slab vapor results the sewers may be impacted by chlorinated volatile organic compounds (CVOCs). A sewer vapor investigation is required per Wis. Admin. Code § NR 716.11(5)(a). Gas monitoring should be conducted in the sanitary sewers and storm sewers where they can be accessed. Include the utilities (and depths) on all appropriate maps and cross sections.
 - Additional assessment of the vapor intrusion pathway should be conducted to determine whether the current and/or historic laterals and the utilities along Richard Street are acting as conduits for vapor migration. For more information on vapor intrusion pathways you may review DNR's *VI: New Preferential Pathways* webinar from July 15, 2020 on the [Issues and Trends](#) website. Additional information is also available on the [DNR's Vapor Intrusion for Environmental Professionals](#) website under the "Other Resources" tab.
3. As indicated in the August 17, 2020 DNR Regulatory Reminder Letter, Per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, an evaluation of potential PFAS compounds and other applicable emerging contaminants that may have historically or presently produced, used, handled, or stored at the site is required. The evaluation should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded.

Additional Documentation

- Clear and defined maps and figures. Include clearly marked and identified sample locations, iso-contour lines, and associated sample exceedances.
- A site map with the location of the dry-cleaning room and sample locations in relation to the building footprint.
- A site layout map with previously reported discharges: location of all former USTs and previous site investigation information (NR 716.15 (2)(d)).
- Figures need to show iso-contours and show how this soil is related to the former dry-cleaning area and other possible sources on-site.
- Include an additional cross section running west/east through the source area(s) to demonstrate the extent of contamination and plume stability.
- Soil tables should include a distinction, identifying results exceeding industrial and/or non-industrial direct contact RCLs as well as groundwater pathway RCLs in accordance with Wis. Adm. Code § NR 720.
- Use identical sample nomenclature throughout the report, figures and tables.

Assistance with site investigation report preparation, attached is the link to, Site Investigation Preparation Checklist: <https://dnr.wi.gov/files/PDF/forms/4400/4400-317.pdf>

Schedule

Within 60 days of the date of this letter, respond in writing with a schedule of your plans to meet these requirements per Wis. Admin. Code § NR 716.09(1). Until requirements are met, your Site will remain "open" and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met.

Conclusion

If you have any questions regarding the information in this letter or would like to schedule a meeting to discuss this case, please contact me at 414-316-0208 and Linda.stanek@wisconsin.gov.

The DNR appreciates your efforts to restore the environment at this Site.

Sincerely,



Linda Stanek
Hydrogeologist, Southeast Region
Remediation & Redevelopment Program

cc: Edward Diesch - Graef
SER File