



December 17, 2021

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

Subject: **Technical Review Request- 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 December 9, 2021, the Wisconsin Department of Natural Resources (DNR) reviewed the Technical Review Request for the case identified above. The Technical Review Request was prepared and submitted on your behalf by your consultant, Graef-USA (Graef). The Technical Review Request was reviewed for compliance with the requirements in Wis. Admin. Code § NR 716.

Technical Review Request Summary

One monitoring well (MW-1) was installed on September 13, 2021 and sampled on September 24, 2021 to evaluate potential chlorinated volatile organic compound (CVOC) impacts to groundwater. As defined by Wis. Admin. Code § NR 700.03(23), groundwater was encountered. The results indicated vinyl chloride exceeding NR 140 enforcement standards and tetrachloroethene exceeding NR 140 preventive action limits. Additionally, CVOC contamination in soil extends to 22.5 feet below ground surface and groundwater was detected at 19.68 feet below ground surface indicating that soil contamination extends below the water table.

Site Investigation Review

The Technical Review Request was reviewed for compliance with Wis. Admin. Code § NR 716. As discussed with your consultant on December 14, 2021, the DNR has determined that additional actions and/or information is required to complete the site investigation as summarized below:

1. Wis. Admin. Code § 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.
 - Monitoring well MW-1 was sampled on September 24, 2021. The results indicated vinyl chloride exceeding NR 140 enforcement standards and tetrachloroethene exceeding NR 140 preventive action limits. To evaluate groundwater contamination and groundwater flow direction, install additional Wis. Admin. Code § NR 141 compliant monitoring wells

and conduct groundwater sampling and monitoring. Due to the slow recharge of groundwater at MW-1, ensure appropriate screen depth for future monitoring wells.

- Determine the hydraulic conductivity of materials in accordance with Wis. Admin. Code § NR 716.11(3)(c).
 - CVOCs tend to sink/dive within the groundwater plume. If the contamination is found to be widespread, the DNR recommends consideration of a piezometer to vertically define the plume in accordance with Wis. Admin. Code § NR 716.11(5)(f).
2. Per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, site investigation scoping and work plans should include an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site. Anywhere there has been an environmental release of dry-cleaning solvent to the subsurface, the presence of PFAS is also possible because materials treated with related products may have been cleaned at the facility.

Base on the presence of CVOC contaminants in soil, groundwater, and vapor, the DNR recommends the re-evaluation of potential PFAS compounds to include the following information:

- How did your dry-cleaning operation dispose of used solvent?
- What sort of products did you clean for your customers?
 - Did your dry-cleaning operation routinely clean stain-resistant or waterproof garments, carpets or floor products?
- Did your dry-cleaning operation waterproof any products?
 - If so, what compounds were used to waterproof the products?
 - How were those compounds disposed of?
 - Were any waterproofing compounds spilled?
 - What was the protocol when the waterproofing compounds were spilled?
 - Were there water quality tests conducted as a result of the spill?
 - Were the levels of PFAS tested?
- Did your dry-cleaning operation spill any used solvent?
 - What was the protocol when solvent was spilled?
 - Were there water quality tests conducted as a result of the spill?
 - Were the levels of PFAS tested?
- Should PFAS sampling be incorporated in the next scope of the investigation?

Discharges of PFASs to the environment are subject to regulation under Wis. Stat. § 292 and the requirements for immediate notification, investigation, and remediation in Wis. Admin. Code chs. NR 700 through 754.

Schedule

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

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of a supplemental site investigation work plan within 60 days of the date of this letter. The work plan must comply with Wis. Admin. Code § NR 716.09(2).
- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of submittal of the work plan.
- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation.

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: Brian Schneider and Edward Diesch - Graef
SER File