



December 15, 2022

Spic and Span
Robert Miller
108 West Miller Drive
Mequon, WI 53092-6188

Subject: Review of Site Investigation Report
Spic and Span, Inc. (FMR)
4301 N. Richards Street, Milwaukee, WI
DNR BRRTS # 02-41-585636 DNR FID # 241040690

Dear Mr. Miller:

On November 30, 2022, the Wisconsin Department of Natural Resources (DNR) reviewed the Site Investigation Report dated June 2, 2022, the amended Site Investigation Report dated June 27, 2022, and supplemental information for the site identified above. The Site Investigation Reports and supplemental information was prepared and submitted on your behalf by Graef-USA. The current consultant is now the Ramboll Group (Ramboll). The site investigation reports and supplemental information were reviewed for compliance with the requirements in Wis. Admin. Code ch. NR 716. The DNR has received all applicable fees for providing a review and response, in accordance with Wis. Admin. Code § NR 749.04 (1)

Site Investigation Summary

Indoor air samples were collected on October 23, 2019, at the former Spic and Span facility, 4301 N. Richards Street, Milwaukee, WI (Site) at the request of real estate brokers for potential sale of the property. Tetrachloroethene (PCE) was detected at concentrations greater than the Vapor Action Level (VAL). Based on the indoor air sample results, sub-slab vapor sampling was conducted, resulting in exceedances of the Vapor Risk Screening Level (VRSL). A Notification of Hazardous Substance Discharge was received by the DNR on April 3, 2020, for vapor contamination. The source of contamination is understood to be from the former dry-cleaning operations. Site investigation activities to-date have identified the presence of volatile organic compounds (VOCs) exceeding vapor VRSLs, soil Wis. Admin. Code ch. NR 720 residual contaminant levels (RCLs), and groundwater Wis. Admin. Code ch. NR 140 preventive action limits (PALs) and/or enforcement standards (ES). Additionally, vapor sampling was conducted in the sanitary and storm sewers. No VRSL exceedances were detected in the sewer samples. The reports and supplemental information identified the need for further work at the Site.

Site Investigation Review

The DNR has determined that additional actions and/or information is required to complete the site investigation as summarized below:

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.

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. It appears that Ramboll has received no response from the adjacent property owner regarding off-site access. Document your attempt(s) to contact the property owner to discuss access to the property.

b. Groundwater Pathway

- Define the lateral extent of groundwater contamination to the west of the source area and monitoring well MW-1.
- Define the lateral extent of groundwater contamination to the north. Once access on the neighboring property to the north is granted, install a monitoring well, in conjunction with the continued soil investigation.
- Define groundwater in the vicinity of the sanitary sewer utility running east between monitoring wells MW-3 and MW-4. Elevated soil impacts in the vicinity of the sanitary sewer were detected within potential groundwater and require additional investigation.
- Install a piezometer in the vicinity of monitoring well MW-1 to define the vertical extent of groundwater impacts.
- Re-evaluate the groundwater flow direction after installation of the additional monitoring wells.

c. Vapor

- Define the extent of vapor contamination in the vicinity of the source area. Install additional vapor points to define vapor impacts. At least two vapor samples, with detections below the small commercial VRSLs, is required for delineation.
- Additionally, vapor impacts greater than small commercial VRSLs could be interpreted to exist across the entire building, then mitigation would be required for the complete building footprint and no additional vapor investigation will be required.

Remedial Action Plan

The remedial action recommendations include the following:

- Inclusion in the WDNR groundwater registry
- Placement of a topping slab in the two smaller interior room
- Removal of contaminant mass and at the same time shift the center of any remaining PCE and TCE contaminated soil to the wide- open area of the building that has high ceilings and slab thickness of 8 inches or greater.

Remedial Action Plan Review

Based on the information submitted to date, the DNR has determined that the remedial actions proposed are not adequate for the site conditions. The DNR has the following comments for consideration when preparing an amended Remedial Action Plan:

- The proposed area of the topping slab does not cover the entire area of VRSL exceedances. Additionally, a topping slab is unlikely to be approved as a stand-alone method for long-term vapor mitigation.
- Chlorinated VOCs in soil cannot be relocated on-site and must be disposed of off-site if excavated.

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: Brian Schneider, Ramboll Group, bschneider@ramboll.com