State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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November 28, 2023

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

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

Dear Mr. Miller:

The Wisconsin Department of Natural Resources (DNR) reviewed the *Combined NR 716 Site Investigation and NR 722 Remedial Action Options Report* dated June 2023, the *Revised Combined NR 716 Site Investigation and NR 722 Remedial Action Options Report* dated July 2023, and supplemental information (Reports) for the site identified above. The Reports were prepared and submitted on your behalf by the Ramboll Group (Ramboll). The Reports were reviewed for compliance with the requirements in Wis. Admin. Code ch. NR 716 and ch. NR 722. 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 the potential sale of the property. Tetrachloroethene (PCE) was detected at concentrations greater than the U.S. EPA Regional Screening Levels (RSLs), vapor action level (VAL). Based on the indoor air sample results, sub-slab vapor sampling was conducted which identified exceedances of the U.S. EPA RSLs, vapor risk screening levels (VRSLs). A Notification of Hazardous Substance Discharge was received by the DNR on April 3, 2020, for vapor contamination. The source of contamination is assumed 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 residual contaminant levels (RCLs), and groundwater preventive action limits (PALs) and/or enforcement standards (ES).

Site Investigation Review
The Reports were reviewed for compliance with Wis. Admin. Code ch. NR 716. Based on the information submitted to date, the DNR has determined that the soil and groundwater investigations are complete for the reported hazardous substance discharge associated with the former dry-cleaning operations. Additional actions to address the vapor intrusion risk at the site are necessary as described below.

Remedial Action Options Plan

The chosen remedial action option provided within the Reports recommends the following:

- Excavation of sub-slab soils to approximately 9 feet below ground surface with subsequent engineering controls
- Two rounds of sub-slab vapor sampling from at least four previously sampled sub-slab vapor monitoring points at three and six months after completion of the excavation
- If necessary, sub-slab depressurization system (SSDS) activation in the remaining unexcavated areas
- Preparation of a remedial action plan to be submitted to the DNR

Based on conversations with your consultant, this plan has been revised to:

- Excavation of sub-slab soils to approximately 9 feet below ground surface with engineering controls
- Installation and activation of a SSDS to mitigate the potential for vapor intrusion
- Completion of SSDS commissioning activities to verify the effectiveness of the SSDS
- A Remedial Action Plan will be prepared and submitted to the DNR

Remedial Action Options Plan Review

Based on the information submitted to date and conversations with your consultant, the DNR has determined that the conceptual remedial actions proposed are adequate for the site conditions. The DNR has the following comments for consideration when preparing the remedial action plan:

- The depth of the remedial excavation is limited due to equipment accessibility issues inside a building and setbacks required in some areas for bearing walls. Consider incorporating in-situ chemical oxidation at base of the excavation to address the deeper, higher concentrations of CVOCs identified in soil.
- The Reports do not describe how the excavated material will be managed or disposed of and they do not describe whether the excavated material will be considered a hazardous waste. Both state and federal rules require the generator of a solid waste to determine whether that waste is a hazardous waste. This requirement (see Wis. Stat. § 291.21) applies to contaminated media and other waste generated during remediation activities. The DNR reminds you to comply with all state and federal laws regarding management and disposal of solid waste. More information regarding hazardous waste determinations and hazardous waste remediation can be found in the DNR document RR-705 “Guidance for Hazardous Waste Remediation.” You may submit a technical assistance request with the appropriate fee if you want DNR review of your waste determination.
- Based on the current concentrations of chlorinated volatile organic compounds (CVOCs) in sub-slab vapors exceeding the applicable VRSLs and indoor air concentrations exceeding the VALs, the DNR agrees with the proposal to install and activate a SSDS.
- The DNR agrees with the proposal to activate the SSDS and complete follow up SSDS commissioning activities. The SSDS commissioning activities should include pressure field extension testing and indoor air sampling to demonstrate that the VMS is effectively mitigating the vapor intrusion pathway. Passive samples collected over a duration of 5-14 days are recommended for the follow up indoor air sampling. For additional guidance regarding vapor intrusion mitigation and vapor mitigation system commissioning, see the DNR document *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin* (RR-800).
- The DNR recommends collection of indoor air samples to demonstrate indoor air concentrations are below applicable VALs prior to building occupancy. As a reminder, sample results should be submitted to the DNR within 10 days of receipt of laboratory data.

- Due to the potential for exposure to hazardous substances during the proposed excavation, including exposure to contaminant vapors, appropriate health and safety measures should be implemented to minimize exposure to hazardous substances.

Emerging Contaminants Evaluation

The DNR has reviewed the Emerging Contaminant Evaluation contained within the Reports. Based on the information provided, the DNR is not requiring further assessment or investigation of emerging contaminants at this time.

Next Steps

Submit remedial action design plans and specifications that comply with Wis. Admin. Code ch. NR 724.

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 or linda.stanek@wisconsin.gov

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

Sincerely,

Linda Stanek

Linda Stanek
Hydrogeologist, Southeast Region
Remediation & Redevelopment Program

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