

September 22, 2020



Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212

Attention: Ms. Jennifer Dorman
Phone: (608) 219-2205

Re: **Site Investigation Work Plan**
Rosselli Dry Cleaning (FMR)
715 57th Street #101
Kenosha, Wisconsin
WDNR BRRTS #02-30-586299
Terracon Project No. 58207200

Dear Ms. Dorman:

Terracon Consultants, Inc. (Terracon), on behalf of 757 Properties, LLC, has prepared this Site Investigation Work Plan (SIWP) for the above-referenced site. This SIWP was prepared in accordance with the requirements of NR 716.09, Wisconsin Administrative Code (WAC). The intent of the investigation is to determine the magnitude and delineate the extent of contamination detected during a Limited Subsurface Investigation conducted by EPS Environmental Services, Inc. (EPS). Project information, the proposed scope of work, and tentative schedule are provided in the following sections. A review fee is not being submitted at this time.

1.0 PROJECT INFORMATION

The site is located at 715 57th Street #101, Kenosha, Kenosha County, Wisconsin. Based on a *Limited Subsurface Investigation* report prepared by EPS Environmental Services, Inc. (EPS) and dated August 4, 2020, the site is listed in the Resource Conservation and Recovery Act (RCRA) database as a very small quantity generator of hazardous waste, generating spent halogenated solvents. We understand a dry cleaners (Rosselli Dry Cleaning) operated at the site from approximately 1957 until 1997. The site was purchased by 757 Properties, LLC, which removed the dry cleaning equipment. During removal of dry cleaning equipment from the building, an aboveground storage tank (AST) containing naphtha was encountered and removed. Relatives of the previous owners stated naphtha was used as the dry cleaning solvent throughout the operating life of the dry cleaners. The naphtha AST and dry cleaning equipment had been located in the southeastern portion of the building, and a furnace and fuel oil AST were formerly located in the southwest corner of the building. Until recently, Book Restoration Co. operated at the site, restoring books and maps. The building is currently unoccupied.

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Geotechnical



Environmental



Construction Materials



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We understand that 757 Properties, LLC plans to renovate the building interior, including the removal of the existing concrete floor and installation of new concrete. Because the building had previously housed a dry cleaners, 757 Properties, LLC retained EPS to collect soil and groundwater samples prior to the start of the renovations. EPS advanced four direct-push soil borings (GP-1 through GP-4) to depths ranging from 12 to 16 feet below ground surface (bgs), and installed one temporary groundwater monitoring well (MW-1) in July 2020. Five soil samples were analyzed for volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs). Water did not accumulate in temporary well MW-1; consequently, a groundwater sample was not collected for laboratory analysis.

The soil samples did not contain PAHs at concentrations above their laboratory limits of detection (LOD). One soil sample (GP-1/6') contained toluene at a concentration of 0.0049 milligrams per kilogram (mg/kg), which is less than its residual contaminant levels (RCLs). One soil sample (GP-3/6') contained PCE at a concentration of 0.10 mg/kg, which is greater than its soil to groundwater pathway RCL. 757 Properties, LLC reported these results to the WDNR on August 6, 2020. The WDNR subsequently opened an environmental repair program (ERP) case for the site, Bureau of Remediation and Redevelopment Tracking System (BRRTS) #02-30-586299, and directed 757 Properties, LLC to retain an environmental consultant and conduct a site investigation to define the extent of contamination.

2.0 INVESTIGATION SCOPING

Terracon has been retained by 757 Properties, LLC to conduct a site investigation. Terracon developed a scope of work to determine the magnitude and delineate the extent of contamination detected at the site.

2.1 Site Location and Contact Information

The following information is provided in accordance with NR 716.09(2)(a) and (b), WAC.

Site Name: Rosselli Dry Cleaning (Fmr), BRRTS #02-30-586299.

Site Location: The site is located at a street address of 715 57th Street, Kenosha, Kenosha County, Wisconsin.
SE¼ of the SE¼ of Section 31, Township 2 North, Range 23 East
WTM – X=698,882, Y=236,885
Latitude/Longitude – 42° 35' 01.2" N, 87° 49' 12.2" W

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Responsible Party: 757 Properties, LLC
c/o James Twomey
S3254 Union Avenue
La Farge, Wisconsin 54639
(608) 625-6993
jetowomey@aol.com

Property Owner: 757 Properties, LLC
c/o James Twomey
S3254 Union Avenue
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(608) 625-6993
jetowomey@aol.com

Environmental Consultant: Krista L. Kroeninger
Terracon Consultants, Inc.
9856 South 57th Street
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krista.kroeninger@gmail.com

2.2 Site Investigation Scoping

The following relevant items were evaluated in accordance with NR 716.07, WAC.

Site History [NR 716.07(1)] – Based on a discussion with the current owner, the history of the site included dry cleaner operations from approximately 1957 to 1997. Until recently, Book Restoration Co. operated at the site, restoring books and maps. The building is currently unoccupied.

Contaminant Types [NR 716.07(2)] – Based on the historical property usage, potential contaminants of interest included VOCs and PAHs.

Soil samples collected during the July 2020 limited subsurface investigation were analyzed for VOCs and PAHs. The soil samples did not contain PAHs at concentrations above their LOD. One soil sample contained toluene at a concentration of 0.0049 milligrams per kilogram (mg/kg), which is less than its residual contaminant levels (RCLs). Another soil sample contained PCE at a concentration of 0.10 mg/kg, which is greater than its soil to groundwater pathway RCL. Based on these results, subsequent samples will be analyzed for VOCs.

History of Previous Hazardous Substance Discharges [NR 716.07(3)] –The limited subsurface investigation results were reported to the WDNR, which opened an ERP case (BRRTS #02-30-

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586299). Terracon reviewed the Remediation and Redevelopment (RR) Sites Map to evaluate if additional reported releases are present. The open ERP case is the only reported release for the site.

Four releases are located near the site, based on the RR Sites Map:

- Kenosha Main Post Office, 5605 Sheridan Road, is located on the northwest of the site. A release was reported in October 1997, and a leaking underground storage tank (LUST) case (BRRTS #03-30-176899) was opened. The case received regulatory closure in September 1998. The WDNR information includes a groundwater flow map depicting flow to the east. Based on a report by STS Consultants, no significant release was found and groundwater was not encountered during the investigation. It is unlikely that contamination from the Kenosha Post Office has migrated onto the site.
- Former Heritage House, 5706 8th Avenue, is located southwest of the site. A release was reported in August 2016, and a ERP case (BRRTS #02-30-577677) was opened. The case remains open. PAHs and tetrachloroethene were detected in groundwater and soil. PAHs were thought to be associated with the shallow fill material and not present in the native soil. Based on information on the WDNR's website, groundwater flow at the former heritage house site was east.
- Kenosha News, 715 58th Street, is located south of the site. A release was reported in October 1989, and a LUST case (BRRTS #03-30-000621) was opened. The case received regulatory closure in April 2000. Limited information regarding this release was available through the WDNR's website. Based on information on the WDNR's website, groundwater flow at the Kenosha News site was east, and groundwater contamination consisted of VOCs. It is unlikely that contamination from the Kenosha News site has migrated onto the site.
- Associated Bank (Former Midas), 5701 Sheridan Road, is located west of the site. A release was reported in July 1991, and a leaking underground storage tank (LUST) case (BRRTS #03-30-001791) was opened. The case received regulatory closure in May 2000. Based on information on the WDNR's website, groundwater flow at the Associated Bank site was west, and groundwater contamination consisted of VOCs. It is unlikely that contamination from the Associated Bank site has migrated onto the site.

Environmental Media [NR 716.07(4)] – Based on the investigations completed to date, soil and potentially groundwater and vapor, have been affected by the release.

Site Location [NR 716.07(5)] – The site is located in a mixed-use area of commercial, institutional park, and industrial development.

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Access [NR 716.07(6)] – The current site owner is 757 Properties, LLC. We have contacted James Twomey of 757 Properties to discuss the requested site investigation and obtain access to the site.

Receptors [NR 716.07(7)] – The site is currently unoccupied, but is being renovated for potential commercial use. According to the Kenosha County Interactive Mapping System, the site and adjoining properties are zoned for Central Business (B-3). Water service is provided by the City of Kenosha. Terracon reviewed water supply well information available from the WDNR and the Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP). Water supply wells were not identified for the site. There are no wells potentially located within 1,200 feet of the site.

Potential Impacts to Sensitive Habitat, Wetlands, Resource Waters, and Historical Sites [NR 716.07(8)] – The site is located in a developed area of Kenosha. The Wisconsin Wetland Inventory map does not depict wetlands on the site. The site is not associated with outstanding resource waters or exceptional resource waters as defined in NR 102, WAC. Based on the current use of the site for commercial and industrial purposes, the site is not likely occupied by sensitive habitat or a historical/archeological site.

Interim Action [NR 716.07(9)] – The previous investigation identified soil and potentially groundwater and vapor contamination. Interim action is not warranted at this time as the building is not occupied, but will be further evaluated after the site investigation.

Other Conditions [NR 716.07(10)] – The site is not located in an area with unique climatological conditions that may affect the scope of site investigation activities.

Hydraulic Conductivity [NR 716.07(12)] – Hydraulic conductivity testing has not yet been completed. Soil consists of 6 feet of sand overlying clay soil. The clay soil likely exhibits a hydraulic conductivity in the range of 10^{-7} to 10^{-9} centimeters per second, with the sand likely exhibiting higher hydraulic conductivities. Groundwater did not accumulate in a temporary monitoring well installed during the limited subsurface investigation, suggesting the soil within the shallow groundwater table exhibits low hydraulic conductivity.

3.0 SITE INVESTIGATION WORK PLAN

The results of the limited subsurface investigation indicated that the soil is impacted by VOCs. Based on these results, additional soil investigation is needed to determine the on-site extent and the degree of the VOCs. Groundwater and vapor investigation is necessary to determine if the VOC-impacted soil has adversely impacted groundwater and poses a vapor intrusion risk.

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3.1 Health and Safety Plan

Terracon is committed to the safety of all its employees. As such, and in accordance with our *Incident and Injury Free*® safety goals, Terracon will prepare a safety plan to be used by our personnel during field services. Prior to commencement of on-site activities, Terracon will hold a brief health and safety meeting to review health and safety needs for this specific project. At this time, we anticipate performing fieldwork in a United States Environmental Protection Agency (USEPA) Level D work uniform consisting of hard hats, safety glasses, protective gloves, and steel-toed boots. It may become necessary to upgrade this level of protection, at additional cost, during sampling activities in the event that we encounter petroleum or chemical constituents in soils or groundwater that present an increased risk for personal exposure.

3.2 Locate Utilities in Work Area

In an effort to locate utilities in each work area, Terracon will review any site plans provided to us and will contact Diggers Hotline. To the extent practicable, the locations and depths of the various utilities will be identified to avoid damage to such utilities. A private utility locating firm will be subcontracted to locate private utilities in the areas where the borings are proposed.

3.4 Soil Borings

Terracon will advance 2 direct-push soil borings (P-1 and P-2), inside the building. The proposed boring locations are depicted on the attached site diagram. The borings will be advanced east and west of soil boring GP-3 to further evaluate the extent of the PCE impacted soil at that location. We understand the building is accessible to a portable drill rig, and that the ceiling height is approximately 13 feet.

Based on the previous investigation, soil consisted of up to 6 feet of sand overlying clay soil. Soil was wet at a depth of approximately 6 feet bgs. Temporary groundwater monitoring well MW-1 was installed to a depth of 15 feet bgs. Water did not accumulate, but it is unclear how long the well was left in place before being abandoned. Terracon reviewed the RR Site Map for information regarding depth to groundwater in the area around the site. The depth to groundwater at the Former Heritage House, 5706 8th Avenue (BRRTS #02-30-577677) ranged from approximately 6 to 15 feet bgs. The borings will be advanced to a depth of 16 feet bgs, to the apparent water table, or to refusal, whichever is shallower. Soil samples will be collected continuously to the boring terminus. The proposed boring locations may be modified based upon the presence of utilities or if access is otherwise restricted.

Soil characteristics (e.g. texture, color) and any unusual odors or discoloration will be noted on each soil boring log. A photoionization detector (PID) will be used to field screen soil samples for

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VOC vapors. Two soil samples will be collected from each boring for laboratory analysis. To evaluate the potential for direct-contact risk, one soil sample will be collected from the upper 4 feet of soil exhibiting the highest PID reading or from immediately below surficial material if elevated PID readings are not present. The other soil sample will be collected from the depth below 4 feet and above the apparent water table that exhibits the highest PID reading or from immediately above the apparent soil/water interface, if elevated PID readings are not present. The soil samples will be collected in laboratory-supplied containers, placed in an ice chest to cool to approximately 4 degrees Celsius (°C), and transferred under chain-of-custody protocol to a Wisconsin-certified laboratory for analysis of VOCs using USEPA Method 8260B.

After collection of the soil samples, the borings will be abandoned in accordance with NR 141, WAC.

3.3 Groundwater Monitoring Well Installation and Development

Upon completion of the soil sampling, Terracon proposes to install one NR 140, WAC-compliant groundwater monitoring well (MW-2) using hollow-stem auger techniques to facilitate collection of a groundwater sample. Groundwater monitoring well MW-2 will be advanced at boring GP-3 to evaluate the potential for migration of PCE from soil to groundwater at that location. The proposed groundwater monitoring well location is depicted on the attached site diagram; however, the location may be modified based upon the presence of utilities or if access is otherwise restricted

Because soil samples were previously collected at this location, the borehole for groundwater monitoring well MW-2 will be blind-drilled, and soil samples will not be collected from the boring for laboratory analysis. As noted above, groundwater appears to be present in the area of the site at approximately 6 to 15 feet bgs. The monitoring well will be constructed to a depth of approximately 20 feet bgs with a 15-foot length of 2-inch diameter, 0.010-inch slotted, polyvinyl chloride (PVC) well screen to a solid PVC riser pipe. A sand filter pack will be placed around the screen to a depth of approximately 2 feet above the top of the screen. The remainder of the borehole will be filled with bentonite to near the ground surface. A flush-mount well protector will be installed in concrete at the ground surface.

Following installation, the groundwater monitoring well will be developed with a disposable bailer per NR 141, WAC no sooner than a week after construction.

3.4 Groundwater Sampling

Not sooner than one week following well development, a groundwater sample will be collected from groundwater monitoring well MW-2. Prior to sampling, the static water level will be measured at the groundwater monitoring well. A groundwater sample will be collected from the monitoring

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well and submitted for laboratory analysis. The groundwater sample will be collected using low-flow sampling methods to reduce the potential for sample turbidity that might bias the results. Terracon will purge the monitoring well prior to sampling using a low-flow pump and dedicated tubing. Natural attenuation field parameters such as dissolved oxygen (DO), oxidation-reduction potential (ORP), specific conductance, pH, and temperature will be measured using a water quality meter with a flow-through cell until stable readings are observed for each of the parameters. Generally, a goal of three consecutive readings within 10% taken a minimum of five minutes apart during purging is indicative that groundwater in the well has stabilized. Upon stabilization, a groundwater sample will be collected from the monitoring well. The groundwater sample will be collected in laboratory-supplied containers, placed in an ice chest to cool to approximately 4°C, and transferred under COC protocol to a Wisconsin-certified laboratory for analysis of VOCs using USEPA Method 8260B. A trip blank will also be submitted for VOC laboratory analysis.

3.5 Vapor Monitoring

PCE can pose a potential vapor intrusion risk, and the WDNR requires an assessment of the vapor migration pathway as part of a site investigation. One sub-slab vapor sample (SS-1) and one indoor air sample (IA-1) will be collected. The sub-slab vapor sample and indoor air sample will be collected from near boring GP-3. A background outdoor air sample (OA-1) will also be collected in accordance with WDNR guidance. Sampling locations are depicted on the attached site diagram. The sub-slab vapor sample and indoor and outdoor air samples will be collected in conjunction with the groundwater monitoring well sampling event.

The sub-slab vapor monitoring point will consist of a pre-fabricated Vapor Pin™ sample insert, constructed using a hammer drill in accordance with Terracon's and Cox Colvin standard operating procedures. The sampler insert will be cleaned using an Alconox and distilled water solution before installation to remove residues and contaminants left over from the fabrication processes. A 5/8-inch diameter drill bit will be advanced completely through the concrete slab and into the substrate below the concrete. The insert will then be installed in the hole drilled through the concrete floor slab. The Vapor Pin™ leak-tight sub-slab gas sampling insert will be subsequently installed into the concrete borehole, and the insert hammered into the concrete for a tight fit. The integrity of the vapor monitoring point will be evaluated prior to sampling by conducting a leak test using either the helium shroud or water dam method as the vapor monitoring point is purged. The vapor monitoring point will then be connected to a laboratory-prepared 6-liter Summa canister with a flow regulator calibrated for 30-minute collection. After the collection period ends, the valve will be closed on the canister. The vapor monitoring point will be removed after sampling, as the floor will be replaced at a later date.

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The indoor air sample (IA-1) will be collected in accordance with the WDNR guidance document “Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin” (RR-800). The sample will be collected in a laboratory-prepared 6-liter Summa canister with flow regulator calibrated for 8-hour collection. In accordance with the guidance, an outdoor air sample (OA-1) will be collected in a laboratory-prepared 6-liter Summa canister with flow regulator calibrated for 8-hour collection to evaluate background air conditions. Terracon will collect the air samples over an 8-hour period. The sub-slab vapor sample, ambient and outdoor samples collected within the Summa canisters will be submitted to the laboratory for analysis of chlorinated related VOCs (CVOCs), including, PCE, TCE, trans-dichloroethylene (DCE), cis-DCE, and vinyl chloride (VC) using EPA Method TO-15.

3.6 Investigation-Derived Waste Disposal

Purge water and soil cuttings will be placed in labeled, 55-gallon drums and temporarily stored on site. We will use the laboratory results to prepare a waste disposal profile for a licensed disposal facility and coordinate pickup and disposal of the drums. This work plan assumes that one 55-gallon drum of purge water and one 55-gallon drum of soil cuttings will be generated and that the investigative-derived waste can be disposed as non-hazardous, special waste.

3.7 Analysis Plan

A summary of the proposed sampling/analysis strategy is presented as follows:

<u>Sample Locations</u>	<u>Matrix/Analyses</u>	<u>No. of Samples</u>	<u>Lab Method</u>
P-1 and P-2	Soil: VOCs	4	8260B
SS-1	Sub-Slab Vapor: CVOCs	1	TO-15
IA-1, OA-1	Indoor/Outdoor Air: CVOCs	2	TO-15
MW-2	Groundwater: VOCs	1	8260B

3.8 Reporting

Assuming the extent of contamination is defined, Terracon will prepare a report that will include the following:

- Documentation of field activities;
- Sample location map;
- Soil boring logs;

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- Analytical laboratory results;
- Data evaluation and presentation of pertinent findings; and
- Recommendations regarding further action.

Assuming the results of the site investigation are consistent with the previous investigation and indicate that impacts at the site are limited, Terracon will submit the final report to the WDNR with a completed “Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request” (WDNR form 4400-237), a request for a “No Action Required” determination, and the associated review fee, requesting WDNR concurrence that no further action is required.

3.9 Schedule

Field activities are tentatively scheduled for September 24, 2020. The report will be available within 6 to 8 weeks from authorization.

On behalf of 757 Properties, LLC, we are submitting this SIWP for the WDNR project file. A review fee is not being submitted at this time.

We appreciate your assistance with this project. If you have any questions or comments regarding this SIWP, please contact us at (414) 423-0255.

Sincerely,



Krista L. Kroeninger
Staff Geologist

Edmund A. Buc, P.E.
Senior Environmental Engineer

KLK/EAB/klk:N:\Projects\2020\58207200\Working Files\DRAFTS (Proposal-Reports-Communications)\Rosselli_SIWP.docx

Attachment: Site Diagram

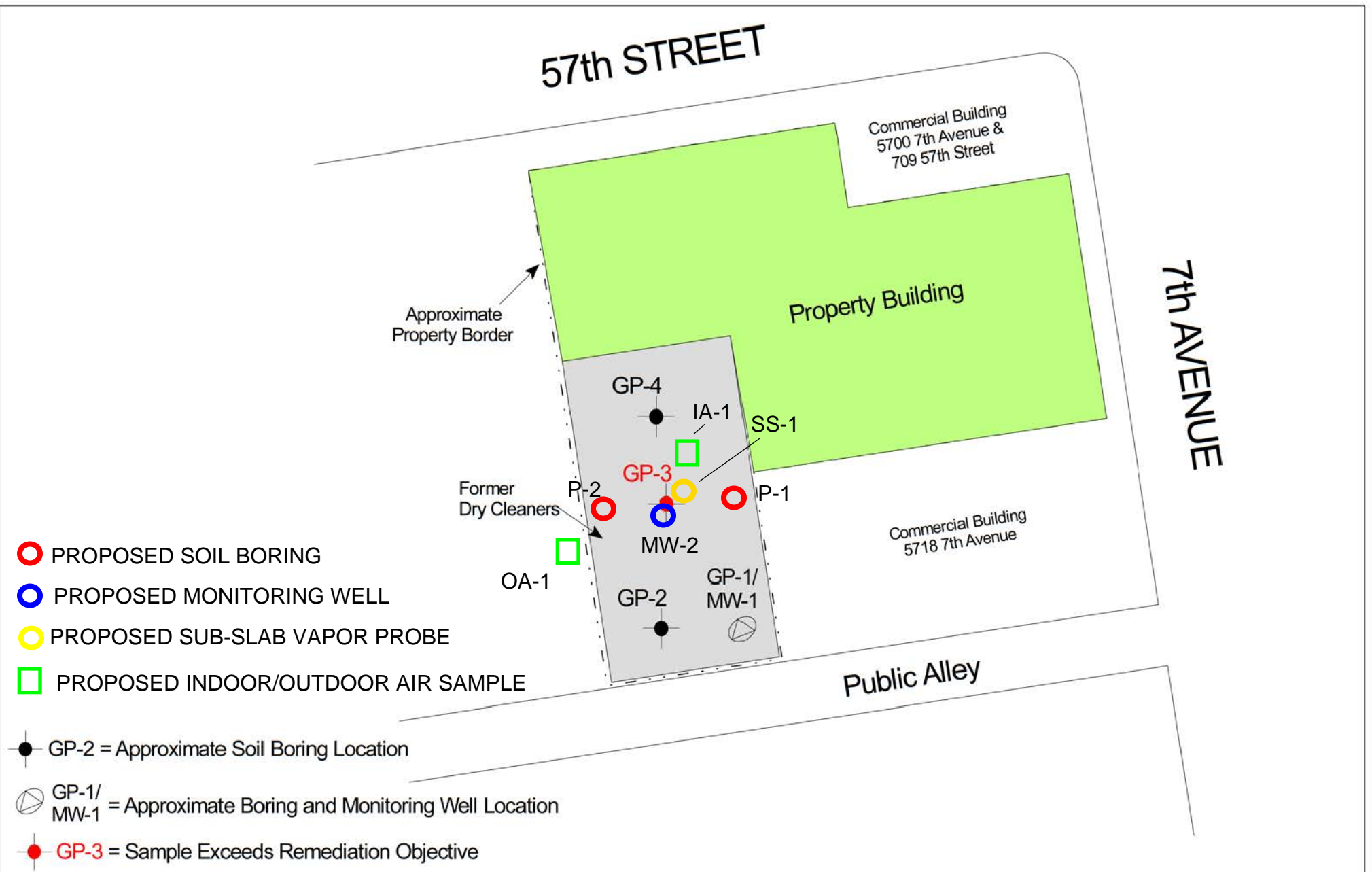


FIGURE ONE - BORING AND MONITORING WELL LOCATION MAP

DATE: 07/24/20

PROJECT # 22437-0720CO#1

DRAWN BY: N. CUZZONE

SCALE: NONE



North

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