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June 13, 2022

WDNR BRRTS#: 02-30-586299

David Thornton
Westgate Property Management
5223 26th Avenue
Kenosha, WI 53140

Dear Mr. Thornton,

Enclosed is our "Site Investigation Field Procedures Workplan" concerning the Rosselli Dry Cleaning site in Kenosha, Wisconsin. This document outlines the procedures and the methods used to conduct such an investigation.

A copy of this workplan will be sent to the Wisconsin Department of Natural Resources for review.

We appreciate the opportunity to be of service to you on this project. Should you have any questions or require additional information, do not hesitate to contact our La Crosse office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Dahl".

Eric Dahl
Hydrogeologist

C: Paul Grittner – WDNR

Site Investigation Field Procedures Workplan

Rosselli Dry Cleaning
715 57th Street
Kenosha, Wisconsin

June 13, 2022
by METCO
WDNR File Reference #: 02-30-586299



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This document was prepared by:

A handwritten signature in blue ink, appearing to read "Eric Dahl", written over a horizontal line.

Eric Dahl
Hydrogeologist

A handwritten signature in blue ink, appearing to read "Ronald J. Anderson", written over a horizontal line.

Ronald J. Anderson, P.G.
Senior Hydrogeologist/Project Manager

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**Site Investigation Field Procedures Workplan - METCO
Rosselli Dry Cleaning**

OBJECTIVES

Requirements of the WDNR

A Site Investigation is being required by the Wisconsin Department of Natural Resources (WDNR) by authority of Section 292.11 of the Wisconsin Statutes. According to the WDNR, any soil that tests over the Chapter NR720 Groundwater RCLs, Direct Contact RCLs, or Soil Saturation Values an investigation and possible remediation. Any groundwater that tests over the Preventive Action Limits (PAL) or Enforcement Standards (ES) for compounds listed in Chapter NR140 of the Wisconsin Statutes requires an investigation and possible remediation. For a further explanation of WDNR rules and regulations, see Appendix D.

Purpose of Document

This document briefly outlines all methods and procedures used by METCO personnel concerning "Site Investigations". These guidelines are strictly followed unless changed by managing personnel, site conditions, or project situations. All changes will be clearly noted.

All work conducted by METCO is undertaken in accordance with approved methods and regulations of the WDNR Bureau for Remediation and Redevelopment.

This document is site specific and will always be on-site during the project.

INTRODUCTION

Site Name

Rosselli Dry Cleaning

Site Address

715 57th Street
Kenosha, Wisconsin

Legal Description

SE ¼, SE ¼, Section 31, Township 2 North, Range 23 East, Kenosha County

Contact or Client

David Thornton
Westgate Property Management
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Kenosha, WI 53140
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david@westgatewi.com

Site Investigation Field Procedures Workplan - METCO Rosselli Dry Cleaning

WDNR Project Manager

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Consultant

METCO
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Eric Dahl
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SITE BACKGROUND

Facility

Sanborn Fire Insurance maps for the years 1886, 1890, 1894, 1900, and 1905 show that the property was originally used for residential purposes. By 1911, a commercial building was constructed on the property with the east and rear portions of the building occupied by a wash house/steam laundry. The 1918 Sanborn map also shows that this commercial space was occupied by a laundry. The 1949 and 1969 Sanborn maps show this commercial space being occupied by a dry cleaner.

The 1911 Sanborn map shows a gas & electrical supplier in the west portion of the building. The 1918, 1949, and 1969 Sanborn Maps show a storefront in the west portion of the building

Based on the Kenosha City Directory records, a laundry operated in the east and rear portion of the building from approximately 1910 until 1923. After the laundry, subsequent tenants of the eastern and rear portion of the building included the following: Stephen Bachman Furniture (1925), Kamm Tire Service (1927-1929), Vacant (1931-1939), Dunlop Tire & Rubber (1941), Vacant (1943-1945), Kenosha Leather & Luggage (1947), Travel Shop Leather Goods (1950-1954), Rosselli Dry Cleaning (1955-1998), Fashion Drapery & Carpeting (1999-2000), No Listing (2001-2005), Jolie's Closet (2006), No Listing (2007), Peace Tree Jewelers (2008-2009), and No Listing (2011-present).

Kenosha City Directory records show the commercial space in the western portion of the building was occupied by various tenants over the years which include Adolph Bromson Hatter (1910), Clark Construction Co. (1912), Schippers Electric Construction Co. (1916), Abr. Prince Dyer (1918), Mrs. Lillian Hansen (1921), Vacant (1923), H.L. Bullamar & Son Real Estate (1925-1996), Vacant (1997), Perfect Image Photo Studios (1998), Great Lakes Staffing (1999-2000), Job Express (2001), No Listing (2002), Trinity Resource Corp

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(2003-2009), and No Listing (2011-present).

The property was purchased by 757 Properties LLC, who removed the dry cleaning equipment. An above ground storage tank (AST) containing Naphtha, which was used as a dry cleaning solvent, was also removed. The dry cleaning equipment and Naphtha AST were located in the southeastern portion of the building. Until recently, Book Restoration Company operated at the site, restoring books and maps. The building is currently vacant.

Based on our research on the historical records of the past property use and according to David Thornton the property owner, there are no known on-site use of materials containing any compounds on the DNRs emerging contaminants list including perfluoroalkyl and polyfluoroalkyl substances or 1,4-dioxane.

Prior to completing planned building renovations, EPS Environmental Services, Inc was hired to collect soil and groundwater samples. On July 24, 2020, EPS personnel supervised the completion of four Geoprobe soil borings (GP-1 thru GP-4) and the installation of one temporary monitoring well (MW-1). Five soil samples were collected from the soil borings for PAH and VOC analysis. There was no water accumulation in the temporary monitoring well and therefore a groundwater sample was not collected. Soil sample GP-3 (6 feet) showed a detection for Tetrachloroethene (PCE) at 0.1 ppm, which exceeds the WDNR Groundwater RCLs. The PCE contamination was subsequently reported to the WDNR, who then required that a site investigation be conducted.

On September 29, 2020, Terracon installed one sub-slab vapor monitoring point (SS-1) in the floor of the on-site building. A sub-slab soil vapor sample was collected from SS-1, along with an indoor air sample and an outdoor air sample, which were analyzed for VOCs. On October 26, 2020, Terracon completed two Geoprobe soil borings (P-1 and P2) with four soil samples collected for VOC analysis. A temporary monitoring well (MW-2) was installed in soil boring P-1. On November 10, 2020, Terracon collected a groundwater sample from temporary monitoring well MW-2 for VOC analysis. The results of the additional investigation by Terracon confirmed the presence of chlorinated solvents in soil and also showed these contaminants to be present in groundwater with the levels of PCE (11.7 ppb) slightly exceeding the NR140 Enforcement Standards (ES). The sub-slab vapor and indoor air sampling results showed no exceedances of the WDNR Small Commercial Vapor Risk Screening Levels (VRSL) or Vapor Action Levels (VAL).

Numerous other LUST, ERP, and Spill sites exist in the City of Kenosha. The nearest known site is the Former Heritage House site (BRRS# 02-30-577677), which is located approximately 315 feet to the southwest of the subject property. The Former Heritage House site is an investigation of unregulated foundry sand fill. Currently it does not appear that this site is impacting or being impacted by the Rosselli Dry Cleaning site.

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Potential Risks and Impacts

Water Supply Wells

The subject property and surrounding properties are all served by the City of Kenosha municipal water supply. The City of Kenosha draws its municipal water from Lake Michigan. There are no known private water supply wells in the area of the subject property.

Surface Waters

The nearest surface water is the Lake Michigan Harbor, which exists approximately 1,425 feet to the north of the subject property. Due to the significant distance, impacts to surface waters are not expected.

Utility Corridors

Per discussion with the City of Kenosha, the sewer and water utilities in 57th Street, 7th Avenue, and 8th Avenue were installed in the late 1800s and are backfilled with native soil. Since these utility corridors are backfilled with native soil, these do not appear to be preferential contaminant migration pathways.

Buildings/Nearby Structures

Based on the indoor air and sub-slab vapor sampling results of the samples collected by Terracon, there were no exceedances of the small commercial indoor air Vapor Action Levels (VAL) or Vapor Risk Screening Levels (VRSL). Therefore, there does not appear to be any risk of vapor intrusion to the on-site building. After monitoring wells are installed and the groundwater flow direction is determined, METCO will determine if other nearby buildings should be assessed for potential vapor intrusion.

METCO is not currently aware of any other impacts, receptors, risks, or local problems associated with the subject property.

SITE CONDITIONS

Topography

According to the USGS Hydrologic Atlas, Kenosha is located in the southern portion of the Lake Michigan Basin. Present day landforms in this area were formed by continental glaciers, which advanced from the north and east scouring the bedrock surface and transporting rock debris in the ice. As the glaciers melted, this unconsolidated material was deposited on the bedrock surface. Kettle moraine deposits, which consist of permeable stratified sediments and till, exist in much of this area. Glacial lake deposits of poorly permeable clay, silt, and sand occur along the shores of Lake Michigan.

The elevation of the site is approximately 605 feet above Mean Sea Level (MSL). See Appendix A for site location.

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Geology

Native unconsolidated materials in this area generally consist of silt/clay with lenses of sand present in some locations. The unconsolidated materials are underlain by dolomite bedrock at approximately 50 to 100 feet below ground surface.

Hydrogeology

Based on data collected from nearby LUST/ERP sites, groundwater is expected to exist at approximately 6 to 12 feet below ground surface. Based on nearby LUST/ERP sites, groundwater flow direction in the area has been highly variable ranging from southeast, southwest, west, northwest, to north.

SCOPE OF WORK

Site Investigation

An investigation consists of collecting samples of soil and groundwater for analysis by a laboratory for compounds related to dry cleaning products (VOCs). The WDNR requires that the investigation determine the degree and extent of contaminants in these mediums, which is commonly referred to as "defining the contaminant plume". Further background information will also be collected to assist in the investigation.

Drilling Project

METCO has proposed 4 monitoring wells to be installed on/off site.

The goal of the Drilling Project is to complete the following:

1. Determine general subsurface geotechnical characteristics.
2. Determine the general extent of contaminants in soil and groundwater.
3. Install monitoring wells in an arrangement that fully defines the horizontal and vertical extent of groundwater contamination based on calculated groundwater flow directions from other nearby sites in the area.
4. Develop the monitoring wells.
5. Collect at least two rounds of groundwater samples from the monitoring wells for VOC analysis.
6. If conditions warrant, perform slug tests on at least one monitoring well.

This data will either completely define the extent of contamination or be used to guide any additional investigation, if required.

Report Preparation

The final report, prepared by METCO, will include background information, observations, procedures, methods, field data, laboratory analysis, site maps,

Site Investigation Field Procedures Workplan - METCO Rosselli Dry Cleaning

data analysis, risk assessment, conclusions, and recommendations concerning all activities conducted for this project. This report will be submitted to the client and the WDNR for review and discussion.

METCO PROCEDURES AND METHODS

Drilling

Drilling is conducted with a truck or track mounted Geoprobe auger drill rig. To penetrate any unconsolidated materials, work is conducted in accordance with ASTM D-1452 "Soil Investigation and Sampling by Auger Boring". If bedrock is encountered and cannot be penetrated with auger boring, an accepted air-rotary drilling procedure will be used.

Continuous soil samples are collected using a Geoprobe macro-core or dual tube system, in which a 4-foot or 5-foot long, 1 to 2-inch diameter soil sampler is advanced to the sampling location. Soil samples are brought to the surface for analysis by either retracting the complete sampling assembly and retrieving the sample from a polycarbonate inner liner or retrieving the polycarbonate liner from inside the rods using the dual-tube system.

PID Screening

Each of the samples, for headspace analysis, are placed in a clean, clear, plastic Ziploc bag. These containers are to be filled $\frac{1}{4}$ full. All containers are the same size and filled to the same volume. The containers are then sealed.

Once collected and sealed, samples are shaken for 30 seconds to break apart soil clods. They are then allowed to establish headspace. The following table is used to determine headspace equilibration time.

Outside temperature	Time to establish headspace
• <40 deg. F	40 minutes
• 41-55 deg. F	20 minutes
• 56-69 deg. F	10 minutes
• >70 deg. F	5 minutes

To take readings, the PID probe is inserted into the plastic bag halfway between the sample and the highest meter response recorded. The samples are screened with a Rae Systems, Mini Rae Lite Meter equipped with a 10.6 eV lamp. Metered calibration is done at the beginning of each workday. Other notes taken are as follows:

1. Temperature and weather conditions.
2. Date of last factory calibration.
3. Field calibration gas used and concentration.
4. Date and time of last calibration.
5. Instrument gain setting.

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6. Erratic instrument readings.
7. Cleaning or repairs performed in the field.
8. Sample moisture (saturated, wet, moist, damp, dry).
9. Petroleum odors or staining of samples.
10. Any instrument quenching.
11. Other relevant information.

Monitoring Wells

Groundwater monitoring well installations are completed under the direction of a METCO hydrogeologist and in accordance with Wisconsin Department of Natural Resources Chapter NR141, "Groundwater Monitoring Well Requirements." The monitoring wells are constructed of flush-threaded, two-inch inside diameter schedule 40 polyvinyl chloride (PVC) piping. Ten-foot well screens with 0.010-inch slots are installed approximately 5 to 6 feet into the watertable. A uniform washed sand is installed around the well screens to serve as a filter pack. Granular bentonite is used above the filter pack to provide a surface seal. Steel, locking protective well casings are cemented in at each well. Any variances from NR141 will be reported to the WDNR.

Each well is developed by alternately surging and purging with a clean polyethylene bailer for 20 to 30 minutes to remove fines from the well screen, after which ten well volumes are removed using a submersible pump.

Groundwater level measurements are obtained using an electronic water level indicator. All measurements are recorded to the nearest 0.01-foot. The probe is thoroughly washed between measurements.

At least two rounds of samples are collected using a bottom loading, disposable, polyethylene bailer and disposable polyethylene cord. Approximately four well volumes are purged from each well before collecting samples.

Depending on site conditions and groundwater sampling results, slug tests may be conducted on two or three of the monitoring wells to determine hydrogeologic parameters (hydraulic conductivity, transmissivity, and flow velocity). During the slug test, groundwater in a monitoring well is displaced using a solid plastic slug, while water levels are recorded using a transducer and data logger. Water levels are recorded until the water level in the well returns to equilibrium. Slug test data is evaluated using the Bouwer and Rice method.

Well Elevation Survey

All wells are surveyed to the nearest 0.01-foot MSL by a qualified surveying company.

Sample Analysis

Environmental samples are collected to minimize both soil disturbance and

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exposure of the sample to the air.

Field observations such as soil characteristics, odors, and staining associated with the samples are continuously noted throughout sampling.

The amount of sample taken, the size of the container used, and the type of sample preservation used, will depend on the laboratory contracted and for which parameters the soil samples are analyzed. See Appendix C for sample guidelines.

All collected samples are stored in a cooler that maintains a temperature of, at most, 4 degrees Celsius. The coolers are accompanied by a complete chain of custody and are delivered to the laboratory within two days of sampling.

Quality Assurance/Quality Control/Waste Management

All drilling and sampling equipment advanced into the subsurface is cleaned between sampling locations. This consists of washing with a biodegradable Alconox solution and rinsing with potable water. Wash and rinse water are disposed of atop an isolated area of asphalt for evaporation or discharged into a local storm sewer.

Drill cuttings, field screened as being contaminated, are contained in 55-gallon DOT barrels, characterized, and properly disposed of by METCO and/or client.

Development and purge waters are contained in 55-gallon DOT barrels, characterized, and properly disposed of by METCO and/or the client. Disposal options will depend on the amount of water, type of contaminants, and concentration of contaminants. All wastewater contaminants and disposal activities are recorded with complete documentation submitted to the WDNR.

Variations

We are not aware of any variations needed at this time.

SCHEDULE FOR INVESTIGATION PROJECT

The following is a checklist of activities that have been, or will be completed, concerning the Site Investigation, along with an estimated time frame. A typical Site Investigation takes approximately 2 to 6 months. The investigation may take up to 12 months if bedrock or groundwater is contaminated.

- 1) METCO submits a Site Investigation Project proposal to client (completed).
- 2) Proposal acceptance by client. METCO notifies the WDNR that a consultant has been contracted (completed).
- 3) METCO submits a Site Investigation Field Procedures Workplan to client and WDNR for review and approval (completed).
- 4) METCO conducts Drilling Project (2-4 weeks). More than one field mobilization may be needed to complete project depending on complexity of the site and project

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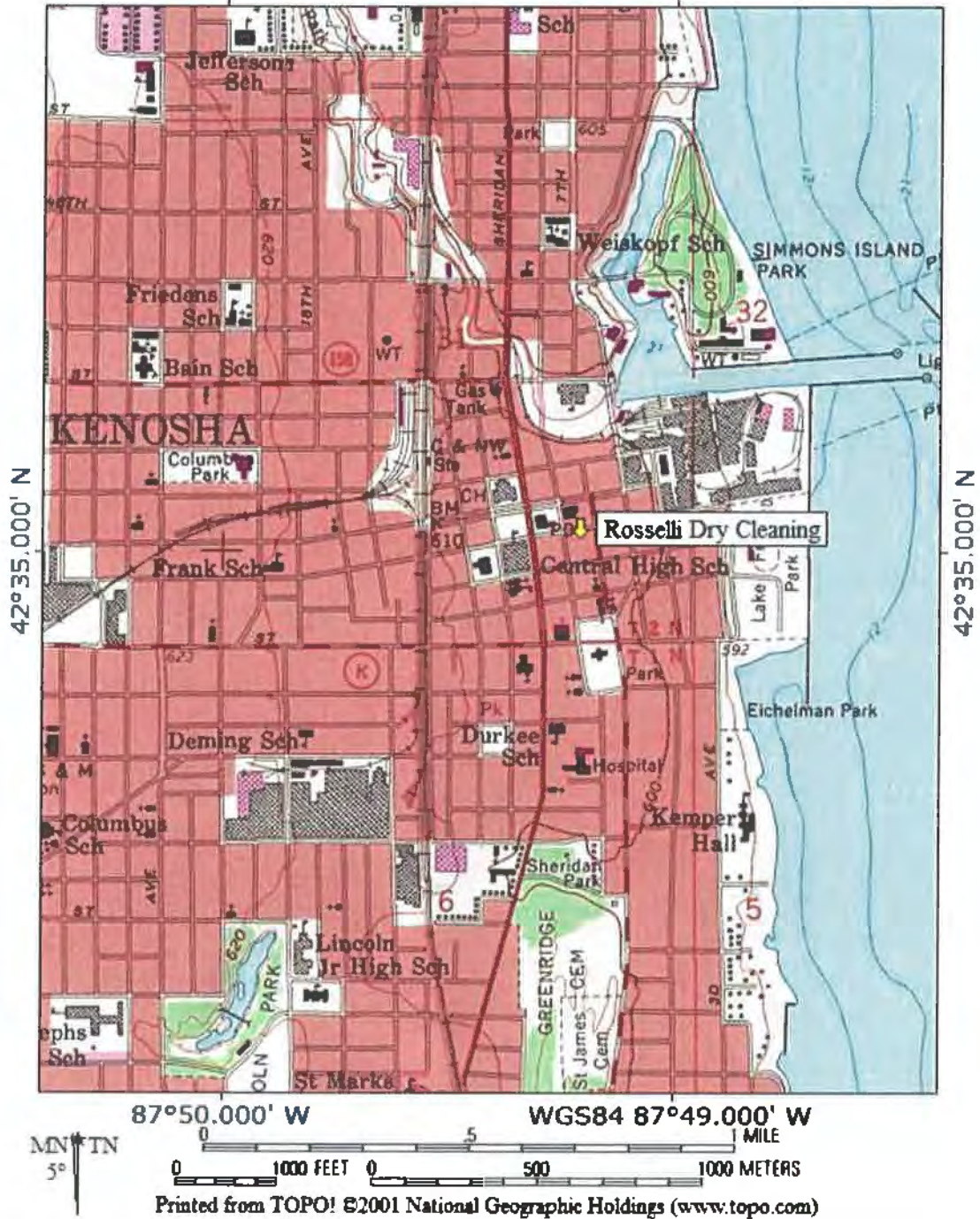
(1 month to receive lab results).

- 5) METCO develops/surveys the installed monitoring wells and collects Round 1 groundwater samples for laboratory analysis (1 month to receive lab results).
- 6) METCO collects Round 2 groundwater samples for laboratory analysis (1 month to receive lab results).
- 7) METCO completes any additional work that is needed, such as slug tests (1 month).
- 8) METCO prepares a Site Investigation report that contains all collected data and submits to the client and WDNR (3-6 months).
- 9) If no further investigation work is required, METCO will apply for "site closure" with the WDNR.
- 10) If further investigation and/or remediation is required METCO will provide further assistance.

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APPENDIX A/ SITE MAPS

TOPO! map printed on 05/06/22 from "Wisconsin.tpo" and "Untitled.tpg"
87°50.000' W WGS84 87°49.000' W



B.1.a LOCATION MAP
CONTOUR INTERVAL 10 FEET
ROSSELLI DRY CLEANING – KENOSHA, WI
SEAMLESS USGS TOPOGRAPHIC MAPS ON CD-ROM

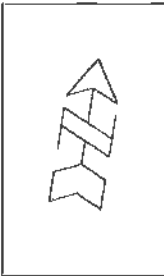
B.I.b. DETAILED SITE MAP
MAP

ROSSELLI DRY CLEANING

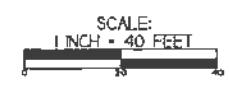


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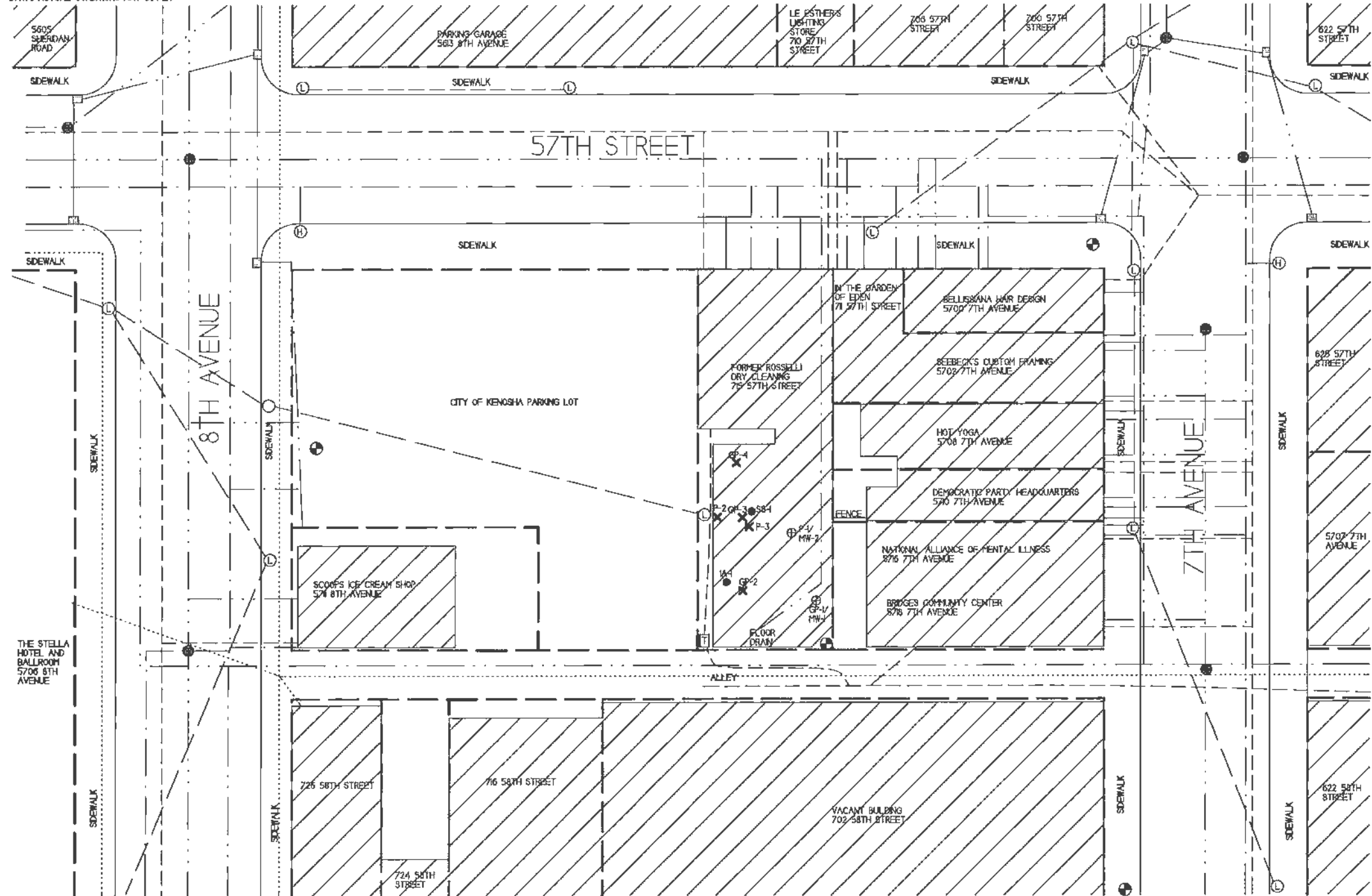
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- - - - - PHONE LINE
- - - - - OVERHEAD UTILITIES
- - - - - BURIED ELECTRIC LINE
- - - - - WATER LINE
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - NATURAL GAS LINE
- - LIGHT POLE
- ⊕ - FIRE HYDRANT
- - UTILITY POLE
- - SEWER MANHOLE
- ⊞ - STORM DRAIN
- ✕ - GEOPROBE BORING LOCATION
- ⊕ - TEMPORARY WELL LOCATION
- - VAPOR SAMPLING LOCATION
- ⊕ - PROPOSED MONITORING WELL LOCATION



NOTE: INFORMATION BASED ON AVAILABLE DATA. ACTUAL CONDITIONS MAY DIFFER



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APPENDIX B/ INVESTIGATION CHECKLIST

SITE INVESTIGATION CHECKLIST
Revised February 1992 PUBL-SW-115

This checklist was prepared by the Department of Natural Resources. It lists the necessary information to include in a site investigation report, for investigations conducted in accordance with guidelines prepared by the Emergency and Remedial Response Section, of the Bureau of Solid and Hazardous Waste Management, Wisconsin DNR. Sites include those where actions are conducted under the LUST, Spills and Environmental Repair programs. If some of this information is not submitted the report should clearly state why it is omitted. More complete information regarding site investigations is available in the Department's "Guidance on Conducting Environmental Response Actions".

The purpose of the site investigation is to 1) define the extent and degree of contamination and 2) to provide a basis for choosing a remedial action alternative. The narrative portion of the investigation report should clearly address these goals.

The Department strongly recommends that the site investigation report follow the sequence of information listed here. This will allow for a quick completeness check and more timely review of submittals. Incomplete reports will not be reviewed until all the necessary information has been received. The following information should be included in the site investigation, (as appropriate to each case):

I. INTRODUCTION/COVER LETTER

- ___ 1. Project title
- ___ 2. Purpose of report and desired department action
- ___ 3. Client(s)
- ___ 4. Author(s), with signatures
- ___ 5. Scope of Services
- ___ 6. Dates the work was performed
- ___ 7. Date of report
- ___ 8. Subcontractors employed by the consultant

II. GENERAL and BACKGROUND INFORMATION

1. General Information

- A. Identify the owner/operator and/or person(s) responsible: (include all applicable)
 - ___ 1. name
 - ___ 2. address
 - ___ 3. day phone number
 - ___ 4. contact person (name)
 - ___ 5. address
 - ___ 6. phone number
 - ___ 7. verification of ownership: photocopy of deed or exact legal description of property
- B. Specify the site of contamination:
 - ___ 1. name
 - ___ 2. phone number
 - ___ 3. specific location (street corner, miles from an intersection, etc)
 - ___ a. legal address (street address if applicable, do not supply just a P.O. Box #)
 - ___ b. location of impacted properties by latitude and longitude, to an accuracy of seconds, at a minimum (preferred method) or State Plane coordinate system
 - ___ c. location of impacted properties by quarter, quarter, section, township, range, civil township, county, or other locational criteria if site(s) are not within the Public Land Survey system
 - ___ 4. type of operation: gas station, tank farm, private residence, manufacturer, etc.
- C. Site Location Maps
 - ___ 1. General Location Map
 - ___ locate on a USGS topographic base map (include quadrangle name, series and scale)
 - ___ locate on a plat map, if applicable
 - ___ 2. Local Base Map: the map must be drawn to scale and include the following items. Other features may also be needed:
 - ___ a. bar scale
 - ___ b. North arrow
 - ___ c. legend
 - ___ d. location of benchmark used
 - ___ e. origin of horizontal grid system

3. Including Site Specific Features: more than one map may be appropriate, use the local map for the base map (These maps may be used for several purposes.)

- ___ a. location of discharge on site or facility, for example, the location of (former) tank and pump islands and piping
- ___ b. location of all buildings on site
- ___ c. locations of public utilities, appropriately marked
- ___ d. property boundaries
- ___ e. location of all soil borings and wells (monitoring wells and potable wells)
- ___ f. location of soil vapor points
- ___ g. locations of where field screenings and lab confirmation samples were taken
- ___ h. nearby/neighborng structures and private wells (within 1200 feet)
- ___ i. any nearby surface waters (within map scale)
- ___ j. roads and paved areas, and other access areas
- ___ k. known and potential sources of contamination
- ___ l. known and potential receptors
- ___ m. limits of excavation

2. Site Background

A. General Site Information

- ___ 1. site description, including features like:
 - ___ - number of tanks/containers
 - ___ - volume/size of tanks/containers
 - ___ - tank/container contents, past and present
 - ___ - tank/container age, installation dates
 - ___ - tank/container construction materials
 - ___ - presence and type of leak detection
 - ___ - presence and type of secondary containment
- ___ 2. general site construction history
- ___ 3. any past reports of spills, or other incidents
- ___ 4. periods of nonoperation
- ___ 5. proximity of sensitive sites such as schools, homes, private or public wells, etc.

B. Description of Discharge Incident

- ___ 1. type of hazardous substances discharged, known or suspected (released, spilled, lost, etc.)
- ___ 2. approximate amounts discharged
- ___ 3. location of impact
- ___ 4. dates of discharge
- ___ 5. local problems associated with discharge, e.g. vapors in homes, well contamination, etc.
- ___ 6. known receptors

C. Impacts

- ___ 1. existing impacts to human health, safety, welfare and the environment
- ___ 2. any impacts to adjacent or nearby buildings, wells or other structures
- ___ 3. names and addresses of owners of adjacent properties, if those properties have been adversely impacted by the hazardous substance discharge

D. Past Activities, Monitoring and Testing

- ___ 1. dates of site activities, duration and type and potential amounts of discharges
- ___ 2. description of emergency actions taken and of interim actions taken, including dates
- ___ 3. record of activities conducted at the site which had potential to cause contamination
- ___ 4. inventory record system data
- ___ 5. summary of monitoring results, including:
 - ___ - product monitoring records according to ILHR 10
 - ___ - groundwater monitoring
 - ___ - surface water monitoring
 - ___ - soil monitoring
 - ___ - sediment monitoring
 - ___ - atmospheric monitoring
- ___ 6. records of testing, repair, removal or replacement, including dates
- ___ 7. tank/container/line integrity testing
 - ___ method
 - ___ testing firm
 - ___ dates
 - ___ results

E. Hazardous Waste Generation

- ___ 1. hazardous waste manifest
- ___ 2. was hazardous waste ever generated or stored on site?

- F. Description of Tank/Container and Soil Removal Activities
- 1. description of soil conditions in the area of the tank/container excavation or in area of discharge
 - 2. volume of (contaminated) soils removed from the excavation
 - 3. location of stockpiled contaminated soils
 - 4. type of impermeable base for stockpiled soils
 - 5. type of impermeable cover for stockpiled soils
 - 6. if excavation was backfilled, what was used as fill?
 - 7. final disposition of soil excavated, where and how were they used? (daily cover, backfill on/off site, roasted, buried, etc.)
 - 8. condition of tanks, lines, pumps (corrosion, visible leaks, etc?)
 - 9. product (other than petroleum) or waste delivery or storage systems

- G. Land Use Information
- 1. current and past land uses of site and neighboring properties
 - 2. description of zoning of property and adjacent properties

3. Environmental Analysis

- A. Site Historical Significance
- 1. impacts or potential impacts to significant historical or archeological features due to any response activities or the discharge itself
 - 2. presence of buildings greater than 50 years old on or next to discharge site

- B. Presence of "Sensitive" Environmental Receptors
- 1. wildlife habitat
 - 2. state or federal threatened or endangered species
 - 3. sensitive or unique ecosystems or species
 - 4. areas of special natural resource interest
 - 5. other surface waters and wetlands, as appropriate

- C. Geology (use maps as appropriate)
- 1. geologic origin, nature and distribution of bedrock
 - 2. geologic origin, nature and distribution of overlying soils
 - 3. thicknesses of various strata (consolidated and unconsolidated)
 - 4. depth to bedrock
 - 5. geophysical characteristics
 - 6. soil types and texture
 - 7. soil descriptions to include:
 - structure
 - mottling
 - voids
 - layering
 - lenses
 - geologic origin
 - Unified Soil System Classification
 - grain size distribution, if applicable
 - evidence of secondary permeability
 - odor, if evident
 - staining, if evident
 - 8. bedrock descriptions, if impacted:
 - rock type
 - grain size
 - bedding thickness
 - presence of fractures
 - orientation of fractures
 - sedimentary structures
 - secondary porosity/solutional features
 - other
 - 9. topography
 - 10. site hydrology, including
 - intermittent and ephemeral streams,
 - drain tile systems,
 - surface waters
 - wetlands
 - location of floodway and floodplain (this may be best located on a site map)

- D. Hydrogeology
- 1. depth to water table
 - 2. flow directions, seasonal variations

- 3. horizontal and vertical gradients
- 4. hydraulic characteristics: (define as field test results or non-field estimates)
 - hydraulic conductivity, variation
 - transmissivity
 - storativity
- 5. aquifer definition:
 - size
 - use
 - presence of aquitards
- 6. local and regional recharge or discharge area(s)
- 7. potentiometric surface
- 8. location, seasonal variation of groundwater divides
- 9. location and extent of perched groundwater
- 10. local and regional groundwater quality
- 11. hydraulic connection between aquifers
- 12. saturated thickness of aquifer
- 13. estimates of flow volume passing below the discharge site/facility (include calculations in the appendices)
- 14. drillers logs which indicated any abnormal drilling difficulties
- 15. isoconcentration maps
- 16. other

III. RESULTS

1. Contaminant Migration Pathway and Receptor Assessment

A. Potential Vapor and Product Migration Pathways (include depth of burial and construction material)

- 1. sewer lines
- 2. storm sewers
- 3. buried power cables
- 4. buried telephone lines
- 5. tile lines
- 6. more permeable soil lenses
- 7. water lines
- 8. road beds
- 9. foundations
- 10. other

B. Potential Receptors of Contamination (description of impacts or potential impacts, if applicable)

- 1. buildings on site
- 2. neighboring basements/buildings
- 3. nearby wells (locations must be provided on a map)
- 4. nearby surface waters, including wetlands
- 5. critical habitats
- 6. endangered species
- 7. outstanding resource waters
- 8. exceptional resource waters
- 9. sensitive or unique ecosystems
- 10. other

C. Potential Health Impacts

- 1. danger of explosion
- 2. contaminated private wells
- 3. contaminated public water supply wells
- 4. exposure to vapors
- 5. dermal exposure
- 6. other

2. Sampling and Analysis Results (figures and tables should be used, but general trends and the overall evaluation should be in narrative form) Provide units of measurement for all results. Describe or provide the following information for each media impacted:

A. soil chemistry results, per parameter, per location

- 1. field screening results with locations identified
- 2. laboratory (confirmation) sample results with locations identified
- 3. any indication of contamination of soils encountered (staining, odor, etc.)

B. groundwater sample results, per parameter, per well, over time

- 1. laboratory results
- 2. trends analysis

- ___ 3. compliance evaluation with NR 140 groundwater standards, if applicable
- C. soil vapor results (define type of survey used)
 - ___ 1. by parameter
 - ___ 2. per location
- D. sampling results from other media impacted by the discharge
 - ___ 1. parameters
 - ___ 2. locations
- 3. Sampling Methods Used (for each media impacted, lists provided for soil and groundwater only)
 - A. Soils:
 - ___ 1. description of sample collection method
 - ___ 2. field screening or analytical instrument type used
 - ___ lamp strength
 - ___ calibration
 - ___ operating procedure
 - ___ 3. sample container
 - ___ 4. temperature at which the sample was collected
 - ___ 5. time allowed for PID or FID samples to achieve at least 70° F, and location
 - B. Groundwater
 - ___ 1. method and instruments used to obtain sample
 - ___ 2. any indication of contamination noticed in field
 - ___ 3. whether the well was purged or not, why and how, and amount removed
 - ___ 4. drilling method used
 - ___ 5. monitoring well construction features
 - ___ 6. abandonment methods
 - ___ a. boreholes
 - ___ b. monitoring wells
 - ___ c. excavations
 - ___ 7. survey methods
 - ___ 8. sample container size
 - ___ 9. sample description
 - ___ - turbid
 - ___ - clear
 - ___ - sheen
 - ___ - free product
 - ___ 10. other
 - C. Vapors/Ambient Air
 - ___ 1. description of sample collection method
 - ___ 2. field screening, if conducted
 - ___ 3. sample container
- 4. Quality Control and Quality Assurance
 - A. General QA/QC (for all media impacted)
 - ___ 1. name and address of laboratory
 - ___ 2. laboratory certification number
 - ___ 3. number of blanks, with results:
 - ___ - field blanks
 - ___ - trip blanks
 - ___ - lab spikes
 - ___ - split samples
 - ___ - replicate spikes
 - ___ 4. name and training of person collecting the samples (including certification, if applicable)
 - B. Field Instrument Quality Control (for all media impacted)
 - ___ 1. instrument make, model and lamp energy
 - ___ 2. limitations of field screening instruments
 - ___ - temperature changes
 - ___ - humidity changes
 - ___ - other
 - ___ 3. any repairs to the instrument
 - ___ 4. field instrument calibration measures conducted
 - ___ 5. time and frequency or schedule of field instrument calibration
 - ___ 6. composition of the calibration gas used (calibration product ?)
 - ___ 7. calibration curves used
 - ___ 8. correction factor if one was used

- ___ 9. results of any calibration checks
- ___ 10. time of day and ambient temperature when calibrations, calibration curves or calibration checks were completed
- ___ 11. time and temperature that samples were equilibrated if the outside temperature is below 60°F at the time of field analysis

C. Field Sampling and Transportation Quality Control and Assurance (for all media impacted)

- ___ 1. sample type
- ___ 2. sample location and associated field and laboratory identification
- ___ 3. sampling technique used
- ___ 4. sampling techniques used to minimize exposure of samples to the atmosphere
- ___ 5. date and time of sampling
- ___ 6. field preservation performed
- ___ 7. date and time of preservation or extraction
- ___ 8. decontamination procedures used during the site investigation
- ___ 9. deviations from standard operating procedures
- ___ 10. shipping time and technique

D. Laboratory Receipt and Analysis (for all media impacted)

- ___ 1. chain of custody forms (4400-151)
- ___ 2. time and date of receipt of samples by the laboratory
- ___ 3. sample condition on receipt by the laboratory including
 - the temperature of the samples and
 - whether the samples were properly sealed
- ___ 4. time and date of analysis
- ___ 5. method of analysis
- ___ 6. laboratory detection limit
- ___ 7. sample results with units of measurement
- ___ 8. accuracy and precision of replicate spikes
- ___ 9. results or percent recovery of matrix spikes with every batch of samples not to exceed eight hours

5. Investigative Wastes (for all media impacted, to include but which is not limited to contaminated water from excavations, borings, purge water, rinse waters from decontamination procedures, extra sample)

- ___ A. analytical results (hazardous determination, if listed?)
- ___ B. ultimate disposal
- ___ C. other

IV. SUMMARY AND EVALUATION OF RESULTS (Analysis of Degree and Extent of Contamination)

- ___ 1. degree and extent of soil contamination
- ___ 2. degree and extent of groundwater contamination
- ___ 3. degree and extent of contamination of other media impacted
- ___ 4. known or potential impacts to receptors, such as water supply wells
- ___ 4. vapor migration potential
- ___ 5. impacts from seepage into basements, utility lines, surface waters
- ___ 6. difficulties experienced during the investigation
- ___ 7. unanticipated or questionable results
- ___ 8. details needing emphasis

V. CONCLUSIONS

- ___ source and type of release defined
- ___ soil and groundwater contamination adequately defined?
- ___ further study needed
- ___ further remediation needed
- ___ known or potential impacts from the release defined?
- ___ clean site, ready for case closure
- ___ other

VI. RECOMMENDATIONS

- 1. Investigation Incomplete
 - ___ continued monitoring
 - ___ additional investigation
- 2. Remedial Action Alternatives (provide description of alternatives) e.g.:
 - ___ remediation method (to be) used for contaminated soil

soil removal, treatment and disposal
soil venting
product recovery
groundwater extraction and treatment
insitu biological treatment
other actions (define)

3. Other
work plans for further action
construction proposals for further action
pilot study, other treatability studies
schedules for further actions
required permits
 air quality
 wastewater discharge

VII. FIGURES

1. Site Maps
- location maps (regional and local)
- water table and/or potentiometric surface maps
- isoconcentration maps
- surface water depth maps
- bedrock and soil type and distribution maps

2. Flow Cross Sections

3. Extent of Contamination in Soil

4. Extent of Contamination in Groundwater (Isoconcentration)

5. Locations of Potential Receptors

6. Geologic Cross-Sections

a. geologic setting

b. boring location

c. soil classification

d. analytical sampling

e. monitoring well locations

f. water table

g. extent of contaminant plume

h. concentrations at referenced date and point

i. sampling intervals (for soil and groundwater)

j. of excavation walls showing location of field screening and/or analytical results, as appropriate

7. Photographs (NO black and white photocopies)

VIII. TABLES

1. Groundwater Chemistry Results

2. Soil Chemistry Results

3. Analytical Methods Used

4. Standards for Comparison and Compliance Determinations (Tables with compliance standards should be combined with analytical results for comparison)

5. Geologic and Hydrogeologic Results

6. Groundwater Elevations

7. Screening Results

8. Other

IX. APPENDICES (up to the author)

1. Table giving data for compounds found, such as:
Chemical formula, Molecular weight, Ionic potential, Solubility,
Vapor pressure, Henry's Law Constant, Kow

2. References used to support methods or provide standards methods, including previous reports

3. All raw data

4. All documentation on forms: (DNR form number)

a. soil boring logs (4400-122)

b. monitoring well construction logs (4400-113A)

c. soil boring/well abandonment forms (3300-5B)

d. chain of custody forms

e. lab/chemistry results

f. groundwater monitoring well information form (4400-89)

g. monitoring well development form (4400-113B)

5. Variances (for well construction, hazardous waste storage requirements, etc.)

- ___ 6. Well logs of all impacted wells and potentially impacted wells within 1200' of the discharge site (locate wells on a map)
- ___ 7. All calculations and assumptions
- ___ 8. Landfill receipts for disposed soil
- ___ 9. Regional hydrogeological information references used

Other information that may be needed includes:

- access
- public information plan
- health and safety plan

**Site Investigation Field Procedures Workplan - METCO
Rosselli Dry Cleaning**

APPENDIX C/ SAMPLING GUIDELINES

SYNERGY ENVIRONMENTAL LAB – Sample Bottle Requirements

**TABLE 1
SAMPLE & PRESERVATION REQUIREMENTS FOR WATER and
DRINKING WATER SAMPLES**

Test	Original Sample Container	Preserved	Storage Time to Analysis
WET CHEMISTRY			
Alkalinity SM2320B/EPA 310.2	250 mL HDPE	4°C	14 days
Ammonia EPA 350.1	250 mL HDPE	4°C, pH<2 with H ₂ SO ₄	28 days
BOD, cBOD SM5210B	500 ml HDPE	4°C	48 hrs.
COD EPA 410.4	250 ml HDPE	4°C, pH<2 with H ₂ SO ₄	28 days
Chloride EPA 300.0/EPA 325.2	250 mL HDPE	4°C	28 days
Cyanide SW846 9012A/SM4500-CN-C	250 mL HDPE	4°C, pH>12 with NaOH	14 days
Flashpoint SW846 1010	250 mL HDPE	4°C	28 days
Fluoride EPA 300.0	250 mL HDPE	4°C	28 days
Hardness SW846 6010B	250 mL HDPE	4°C, pH<2 with HNO ₃	180 days
TKN EPA 351.2	250 Liter HDPE	4°C, pH<2 with H ₂ SO ₄	28 days
Nitrate EPA 300.0	250 mL HDPE	4°C	48 hours
Nitrate+Nitrite EPA 300.0	250 mL HDPE	4°C, pH<2 with H ₂ SO ₄	28 days
Nitrite EPA 300.0	250 mL HDPE	4°C	48 hours
Oil & Grease EPA 1664	1 Liter Glass	4°C, pH<2 with H ₂ SO ₄	28 days
Organic Carbon SW846 9060/ EPA 415.1	250 ml amber Glass	4°C, pH<2 with H ₂ SO ₄ or HCL	28 days
Phenol, Total EPA 420.1	1 Liter Glass	4°C, pH<2 with H ₂ SO ₄	28 days
Phosphorus, Total EPA 365.3	250 mL HDPE	4°C, pH<2 with H ₂ SO ₄	28 days
Sulfate EPA 300.0	250 mL HDPE	4°C	28 days
Total Dissolved Solids EPA 160.1	500 ml HDPE	4°C	7 days
Total Solids EPA 160.3	500 ml HDPE	4°C	7 days
Total Suspended Solids EPA 160.2	500 mL HDPE	4°C	7 days
METALS			
Metals	250 mL HDPE	4°C, pH<2 with HNO ₃	6 months
Mercury SW8467470/EPA 245.1	250 mL HDPE	4°C, pH<2 with HNO ₃	28 days
ORGANICS			
Semivolatiles SW846 8270C	1 Liter amber glass, collect 2 for one of the samples submitted.	4°C	7 days extr. 40 days following extr
PAH SW846 8270C	250 ml amber glass, collect 2 for one of the samples submitted	4°C	7 days extr. 40 days following extr
PCB SW846 8082	250 ml amber glass, collect 2 for one of the samples submitted.	4°C	7 days extr. 40 days following extr
DRO, Modified DNR Sep 95	1 Liter amber glass with Teflon lined cap	4°C, 5 mL 50% HCl	7 days extr. 40 days following extr
VOC'S SW846 8260B/EPA524.2	(3) 40 mL glass vials with Teflon lined septum caps	4°C, 0.5 mL 50% HCl, No Headspace	14 days
GRO/VOC	(4) 40 mL glass vials with Teflon lined septum caps	4°C, 0.5 mL 50% HCl prior to adding sample to jar	14 days
GRO, Modified DNR Sep 95	(3) 40 mL glass vials with Teflon lined septum caps	4°C, 0.5 mL 50% HCl prior to adding sample to jar	14 days
GRO/PVOC	(3) 40 mL glass vials with Teflon lined septum caps	4°C, 0.5 mL 50% HCl prior to adding sample to jar	14 days
PVOC	(3) 40 mL glass vials with Teflon lined septum caps	4°C, 0.5 mL 50% HCl prior to adding sample to jar	14 days

**All samples are to be cooled to 4°C until tested.
HDPE = High Density Polyethylene.**

SYNERGY ENVIRONMENTAL LAB – Sample Bottle Requirements

**TABLE 2
SAMPLE & PRESERVATION REQUIREMENTS FOR SOIL SAMPLES**

Test	Original Sample Container	Preserved	Holding Times from Date and Time of Collection			
			Solvent Addition	Shipping	Extraction	Analysis
METALS						
Metals	2 oz glass or soil cup	4°C	NA	NA	NA	180 days
Mercury SW846 7471	2 oz glass or soil cup	4°C	NA	NA	NA	28 days
Chromium Hexavalent SM3500-Cr	2 oz glass or soil cup	4°C	NA	NA	NA	24 hours
ORGANICS						
Any combinations of GRO, VOC, PVOC	1- tared VOC vial with 10 mls methanol, 13 grams of soil collected with syringe	4°C, 1:1 with methanol	Immediately	4 days	21 days	21 days
DRO, Modified	1- tared VOC vial, 13 grams of soil collected with syringe jar	4°C, Hexane	10 days	4 days	47 days	47 days
PAH, SW846 8270C	2 oz glass untared	4°C	NA	NA	14 days	40 days
Semivolatife SW846 8270C	2 oz glass untared	4°C	NA	NA	14 days	40 days
PCB SW846 8082	2 oz glass untared	4°C	NA	NA	14 days	40 days

All samples are to be cooled to 4°C until tested.

**Site Investigation Field Procedures Workplan - METCO
Rosselli Dry Cleaning**

APPENDIX D/ WDNR DOCUMENTS

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



August 19, 2020

Mr. James Twomey
757 Properties, LLC
S3254 Union Avenue
La Farge, WI 54639

Subject: Reported Contamination at Rosselli Dry Cleaning (FMR)
715 57th Street #101, Kenosha, WI 53140
DNR BRRTS Activity # 02-30-586299
DNR FID # 230013850

Dear Mr. Twomey:

On August 6, 2020, you on behalf of 757 Properties LLC, notified the Department of Natural Resources ("department") that soil contamination was detected at the site described above.

Information submitted to the department regarding this site indicates 757 Properties, LLC is responsible for the discharge of a hazardous substance or other environmental pollution (hereafter referred to as "contamination") at the above-described site. "Site" refers to the property where the contamination occurred and any other property it has migrated to, as defined in Wisconsin Administrative Code ("Wis. Admin. Code") § NR 700.03(56).

This letter explains how to initiate the investigation and cleanup of contamination of the site, and how to access further information and assistance from the department. The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination.

Legal Responsibilities:

Persons meeting the definition of "responsible party" under § NR 700.03(51) must follow applicable law to address the discharge of a hazardous substance to the environment or other environmental pollution. Wisconsin Statutes ("Wis. Stats.") ch. 292 and Wis. Admin. Code chs. NR 700 through NR 754 provide specific requirements for undertaking appropriate response actions to address contamination, including requirements for emergency and interim actions, public information, site investigations, remedy selection, design and operation of remedial action systems, and case closure.

General Recommendations for Responsible Parties:

The department recommends that you:

1. *Hire a Qualified Environmental Consultant*

To ensure response actions you plan to undertake comply with Wisconsin law, you should hire an environmental consultant within **30 days**, by September 18, 2020 to meet the regulatory deadlines listed below. A delay in hiring an environmental consultant could result in you missing key submittal deadlines.

Hiring a consulting firm with staff that have the appropriate State of Wisconsin qualifications to supervise and certify the submittals is a critical component and necessary to meet your requirements. Further, an environmental consultant should be knowledgeable of Wisconsin's technical procedures and laws, and be able to answer questions regarding cleanup requirements. Required qualifications for environmental consultants are specified in Wis. Admin. Code ch. NR 712. Program guidance is available, see *Wis. Admin. Code ch. NR 712 Qualifications and Certifications, RR-081*.

2. Properly Submit Reports on Time with Required Information Included

Wisconsin law includes timeframes for submitting technical documents and conducting work, as well as specifications for what should be included in those submittals. This letter provides a general overview of the timeframes and first steps to take for site investigation and cleanup. For an overview of timing requirements, please refer to *NR 700 Process and Timeline Overview, RR-967*, enclosed.

The department developed the publication *Guidance for Electronic Submittals for the Remediation and Redevelopment Program, RR-690*, to assist responsible parties and consultants in properly submitting documents. Wis. Admin. Code § NR 700.11(3g), and other specific provisions within Wis. Admin. Code ch. NR 700, outline the requirements for submittals, including electronic submittals. Consultants and representatives of responsible parties are required to submit one paper copy and one electronic copy of submittals, including case closure documents. The electronic version must be an exact duplicate of the paper version. Failure to submit both a paper copy and electronic copy delays acceptance of your submittals.

3. Consider the Benefits of a Fee-based Technical Review of your Submittals

In-depth department review of technical reports and submittals is available for a fee. The Remediation and Redevelopment (RR) Program project managers are available throughout the process to answer general questions and provide general input as the site moves toward closure. However, if you want a formal written response from the department, a meeting or both on a specific submittal, a review fee will be required in accordance with Wis. Admin. Code ch. NR 749. **Obtaining technical assistance from department project managers throughout the process is an effective way to prevent problems and delays at the end of the process when case closure is requested.** Forms, a fee schedule, and further information on technical assistance is available at dnr.wi.gov and searching “brownfield fees”.

Required Steps to Take and Documents to Submit:

The steps listed below serve as a general overview only — all mandatory steps and submittals specified in state law must be met before the department can grant “case closure”, which is a determination by the department that no further cleanup is necessary at a site, as defined in Wis. Admin. Code § NR 700.03(3m).

1. **Scoping and Work Plan Submittal – NR 716.07 and 716.09:** The law requires that you appropriately scope out your site investigation and submit a work plan within **60 days of this notification**, by October 19, 2020, for completing a site investigation. The work plan must comply with the requirements in Wis. Admin. Code, chs. NR 700 through NR 754. For additional assistance,

the department has extensive guidance on its web page at dnr.wi.gov and search “brownfield publications”.

Prior to and during a site investigation, you must evaluate whether any interim actions are needed to contain or stabilize a hazardous substance discharge or environmental pollution, pursuant to Wis. Admin. Code § NR 708.11. If you undertake an interim action (e.g., free product removal), you must submit documentation of the action per Wis. Admin. Code § NR 708.15.

As you develop the site investigation work plan, you must include an assessment of the vapor intrusion pathway. Wis. Admin. Code § NR 716.11(5) outlines the requirements for when to evaluate for the presence of vapors in the sub-surface and in indoor air. The results and conclusions from the vapor assessment must be included in the Wis. Admin. Code § NR 716.15 site investigation report whether or not you elected to take vapor samples. *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, RR-800*, is available to help responsible parties and their consultants comply with these requirements.

2. **Field Investigation – NR 716.11:** Following submission of the work plan, the site investigation must be started within the timeframe provided under law. The timeframe varies depending on whether you are requesting the department’s fee-based review of the work plan. If you do not request a fee-based review of the work plan, you must initiate the field investigation within 90 days of submitting the work plan, and you may proceed with the field investigation upon department notification to proceed; however, if the department has not responded within 30 days, from submittal of the work plan, you may then proceed with the field investigation. If a fee and request for department review of the work plan is submitted, the field investigation must begin within 60 days after receiving department approval.
3. **Sample Results Notification Requirements – NR 716.14:** You must report sampling results to the department, owners, occupants, and various other parties within 10 business days after receiving the sampling results, unless a different timeframe is approved by the department, in accordance with Wis. Admin. Code § NR 716.14.
4. **Site Investigation Report – NR 716.15:** Within 60 days after completion of the field investigation and receipt of the laboratory data, the law requires you to submit a Site Investigation Report (SIR) to the department. As part of the SIR or in the Remedial Actions Options Report (RAOR), if there is soil contamination, the responsible party shall identify the current land use (i.e., industrial or non-industrial) and zoning for the site or facility in accordance with Wis. Admin. Code § NR 720.05(5). Also, as part of the SIR or in the RAOR, you must include any interim action report that may be required under Wis. Admin. Code § NR 708.15.
5. **Remedial Actions Options Report – NR 722:** Within 60 days after submitting the SIR, the law requires you to submit a RAOR. The selected remedy in the RAOR should include an evaluation of green and sustainable remediation criteria, as appropriate, as required by Wis. Admin. Code § NR 722.09(2m). This may be submitted as part of a broader SIR.
6. **Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Reports – NR 724:** Unless otherwise directed by the department, the responsible party shall submit all plans and reports required in Wis. Admin. Code ch. NR 724.
7. **Notification of Residual Contamination or Continuing Obligations – NR 725:** In situations where notification is required, the responsible party must provide submittal(s) that confirms that continuing

obligations have been identified and affected property owners have been notified by the responsible parties 30 days prior to case closure, as required by Wis. Admin. Code ch. NR 725.

8. **Semi-annual Reporting -- NR 700.11:** Wis. Admin. Code § NR 700.11(1)(a) requires responsible parties to submit semi-annual site progress reports to the department until final case closure is granted. The reports summarize the work completed over six months and additional work planned to adequately complete the response action at the site. Consultants may submit these reports on behalf of responsible parties. These reports are due in January and July of each year. Please refer to department publication *NR 700 Semi-Annual Site Progress Report, RR-082*, for more information.

Submittals required under Wis. Admin. Code chs. NR 700 - 726

These documents, as applicable, must be submitted to the department prior to the responsible party requesting case closure, unless otherwise directed by the department:

- Ch. NR 708 reports and documentation for any immediate or interim actions.
- Ch. NR 712 professional certifications and signatures are included with applicable submittals.
- Ch. NR 716 work plan(s) and site investigation report.
- Ch. NR 722 remedial action options report (exception is for Dry Cleaners Environmental Response Fund sites), with the selected remedial action identified.
- Ch. NR 724 design, construction documentation, operation, maintenance and monitoring plans and reports, including vapor mitigation commissioning.
- Ch. NR 725 submittal(s) that confirms that continuing obligations have been identified and affected property owners have been notified by the responsible parties 30 days prior to case closure.
- If requesting case closure, the Ch. NR 726 case closure form and documentation substantiating compliance with the NR 700 rule series.
- Ch. NR 749 fees have been paid, as applicable, including closure and database fees.
- Ch. NR 700 semi-annual site progress reports starting six months after notification.

Additional Information:

The department tracks information on all cleanup sites in a department database available at dnr.wi.gov and search "BOTW". The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this site is listed at the top of this letter. You may view information related to your site on this database at any time.

All correspondence regarding this site should be directed to:

Jennifer Dorman
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212
Jennifer.Dorman@wisconsin.gov

As previously noted, you are required to submit one paper copy and one electronic copy of plans and reports. To speed up processing, your correspondence should reference the BRRTS and Facility Identification (FID) numbers (if assigned) listed at the top of this letter.

Please visit the department's Remediation and Redevelopment Program website at dnr.wi.gov and search "Brownfields", for information on selecting a consultant, seeking financial assistance, and understanding the investigation and cleanup process. Information regarding review fees, liability clarification letters, post-cleanup liability and more is also available.

If you have questions, please call the Project Manager, Paul Grittner, at (414) 405-0764 or Jennifer Dorman at (608) 219-2205 for more information.

Thank you for your cooperation.

Sincerely,



Jennifer Dorman
Environmental Program Associate
Remediation & Redevelopment Program
Southeast Region

Enclosures:

NR 700 Process and Timeline Overview, RR-967
<https://dnr.wi.gov/files/PDF/pubs/rr/RR967.pdf>

Selecting a Consultant, RR-502
<http://dnr.wi.gov/files/PDF/pubs/rr/RR502.pdf>

Environmental Services Contractor List, RR-024
<http://dnr.wi.gov/files/PDF/pubs/rr/RR024.pdf>

VPLE Fact Sheet #2, RR-506
<http://dnr.wi.gov/files/PDF/pubs/rr/RR506.pdf>

Environmental Contamination Basics, RR-674
<http://dnr.wi.gov/files/PDF/pubs/rr/RR674.pdf>

NR 700 Semi-Annual Site Progress Report, RR-082
<https://dnr.wi.gov/files/PDF/pubs/rr/RR082.pdf>

Wis. Admin. Code ch. NR 712 Qualifications and Certifications, RR-081
<https://dnr.wi.gov/news/input/documents/guidance/NR712Guidance.pdf>

Technical Assistance and Environmental Liability Clarification Request, Form 4400-237
<http://intranet.dnr.state.wi.us/formscatalog/ffDispFormImage.aspx?FormID=943>

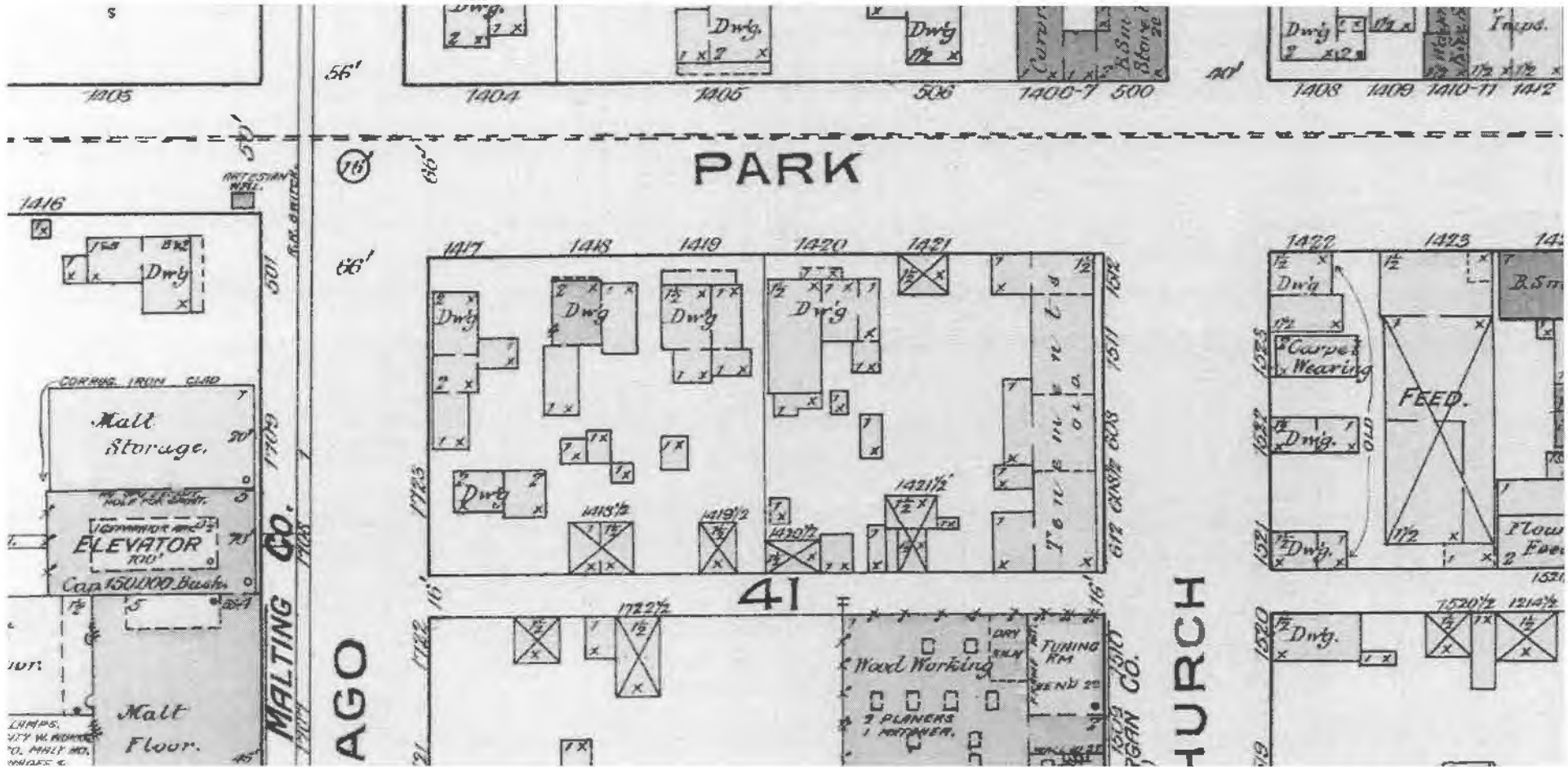
Dry Cleaner Environmental Response Fund (DERF) – Frequently Asked Questions, RR-784
<https://dnr.wi.gov/files/PDF/pubs/rr/RR784.pdf>

Dry Cleaner Environmental Response Fund (DERF) Program Highlights, RR-882
<https://dnr.wi.gov/files/PDF/pubs/rr/RR882.pdf>

cc: Annita Martini – Rosselli Dry Cleaning (FMR)

**Site Investigation Field Procedures Workplan - METCO
Rosselli Dry Cleaning**

APPENDIX E/ PROJECT DOCUMENTS



1886

16

66'

PARK

2nd Dwg x

1

Malt Storage 20'

5

70'

00 Bush

400

Malt Floor

50'

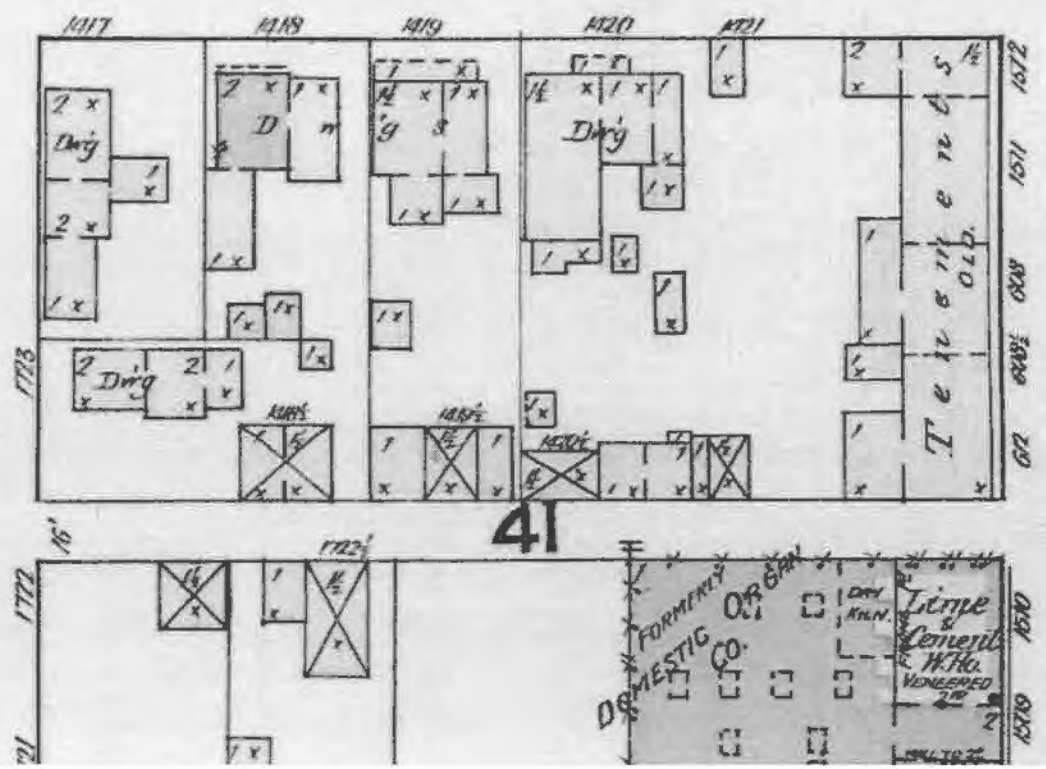
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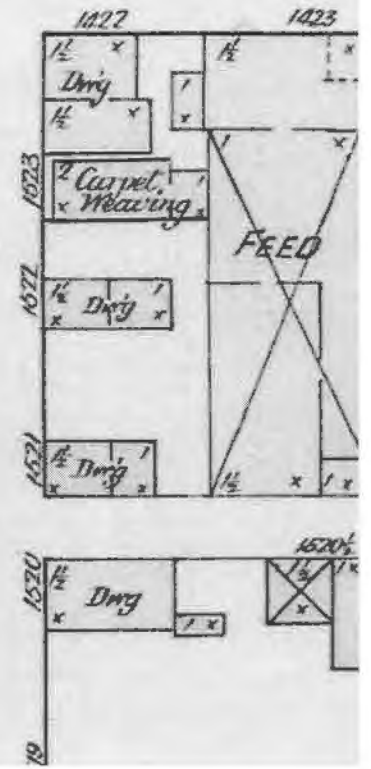
1708

MALTING

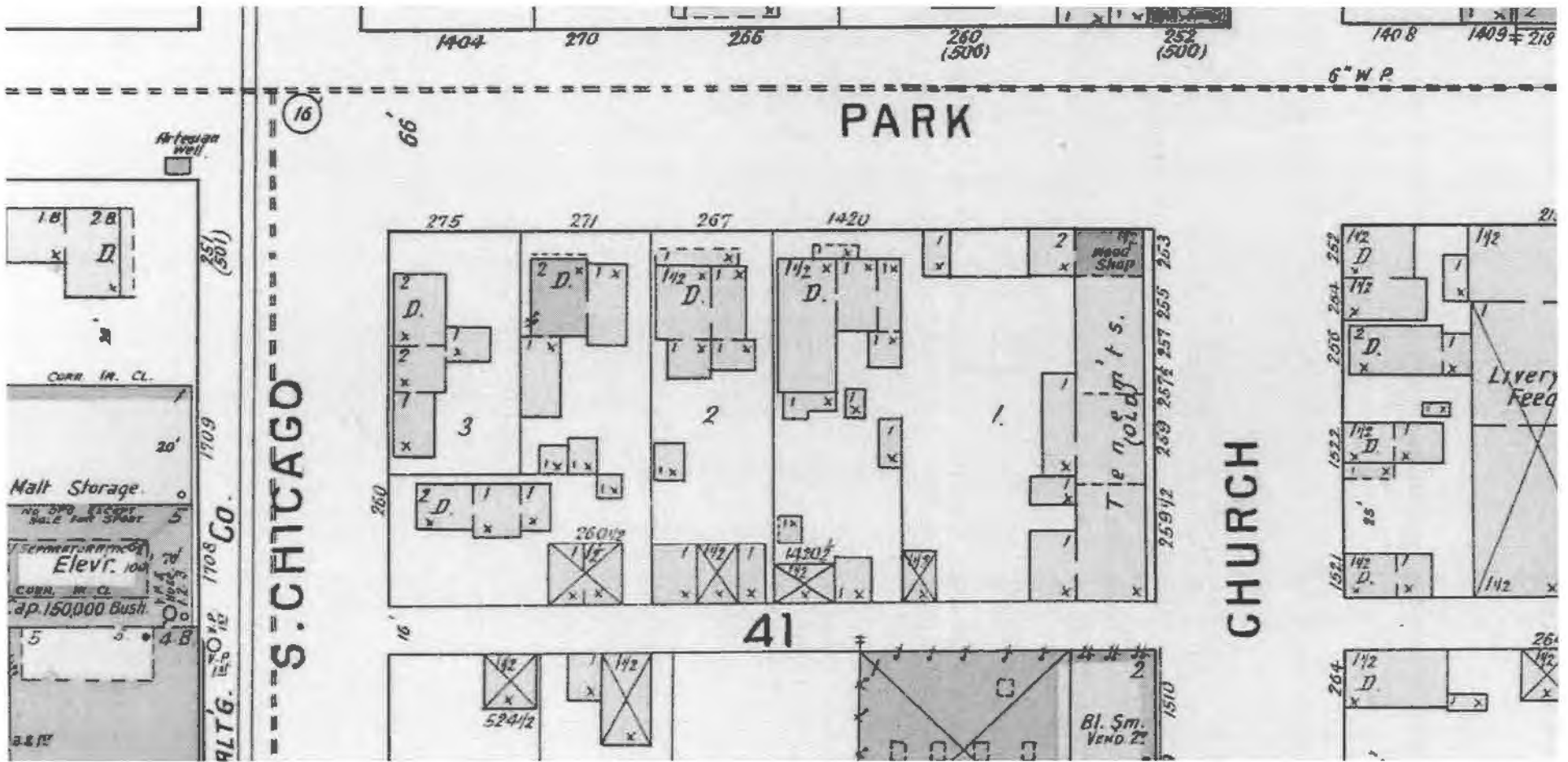
CHICAGO



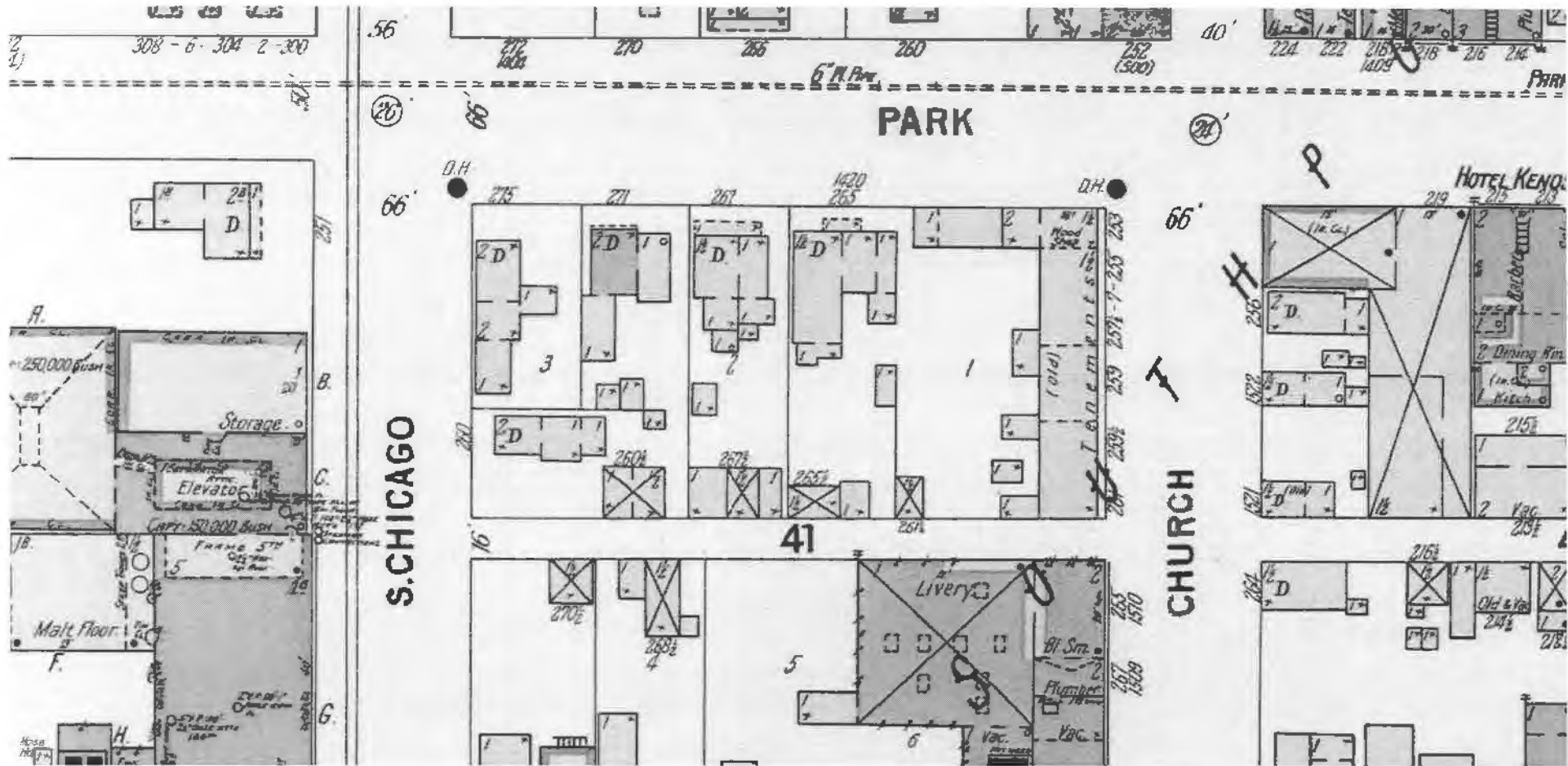
CHURCH



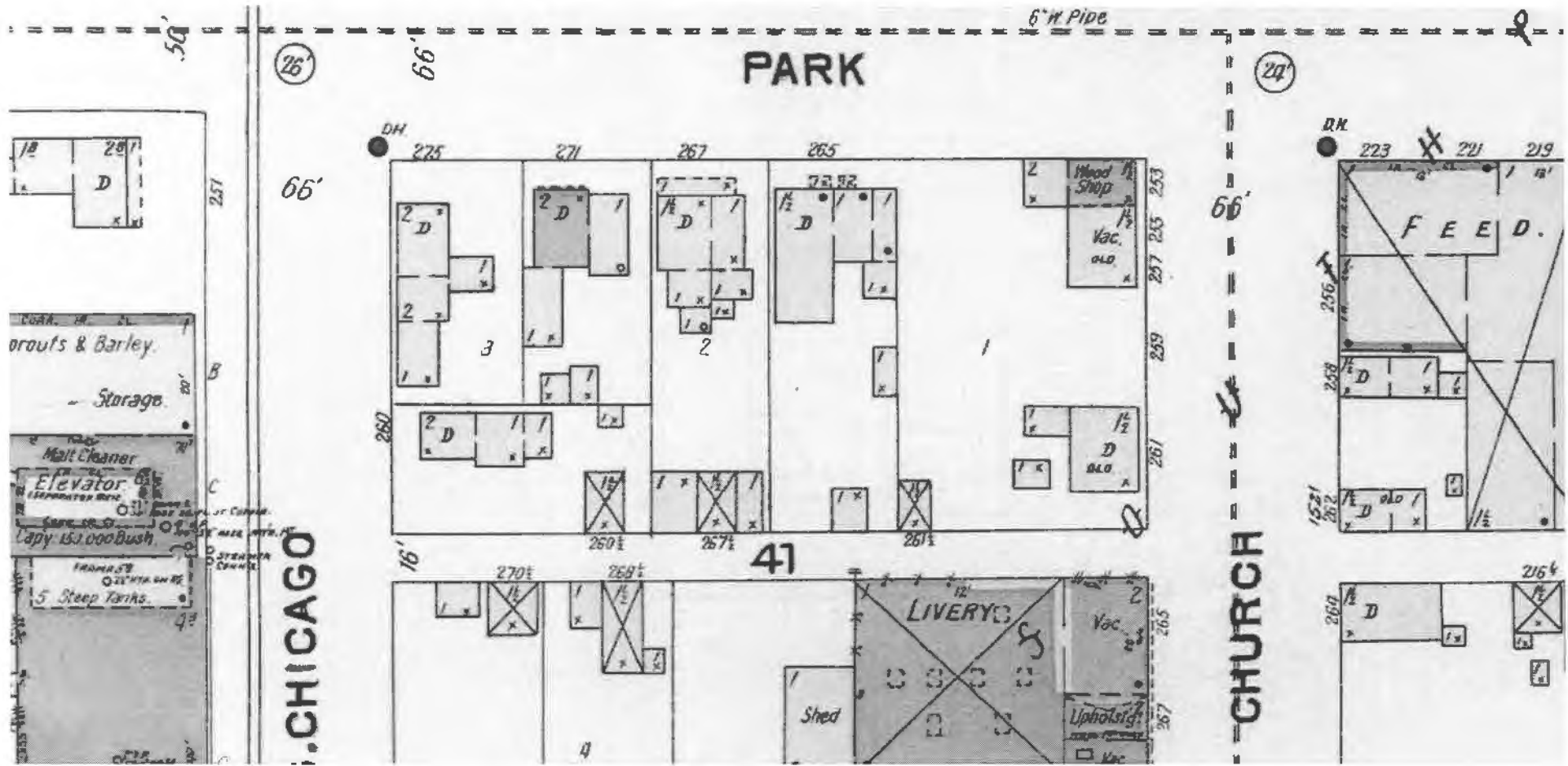
1890



1894



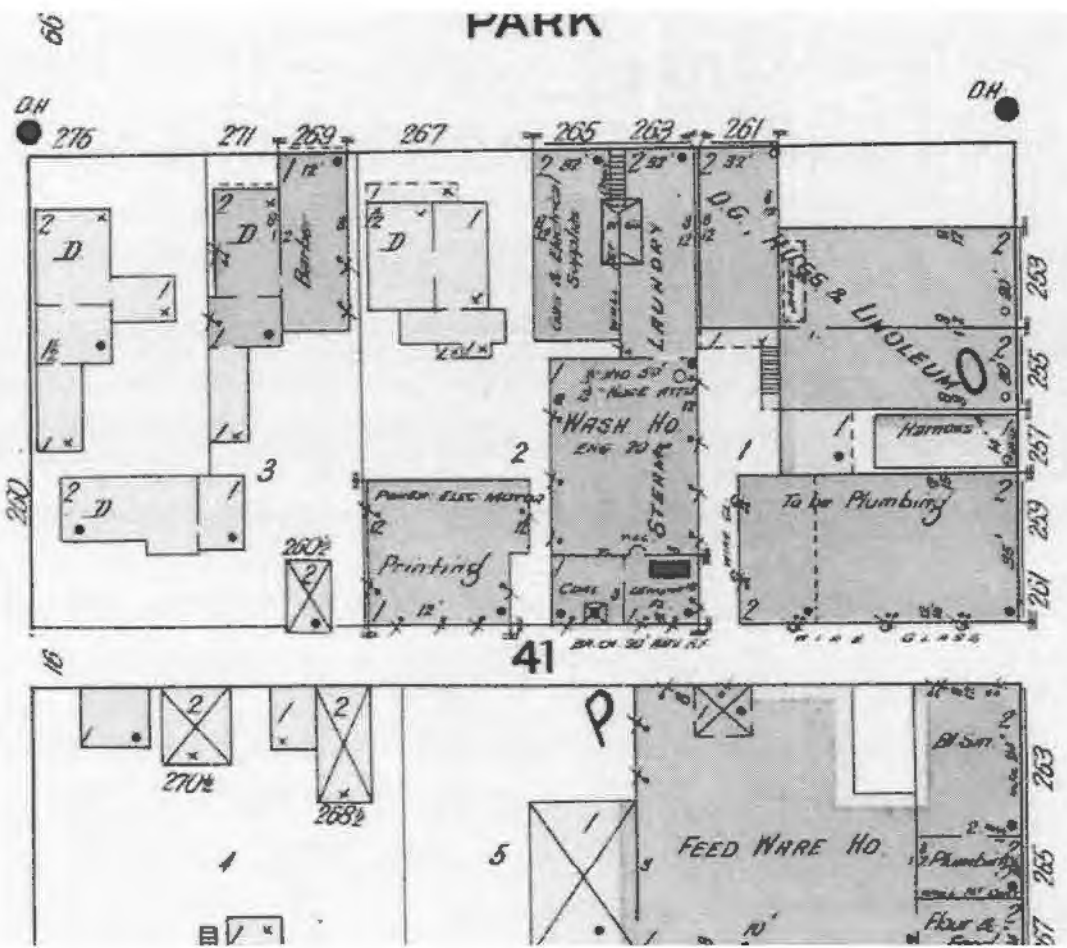
1900



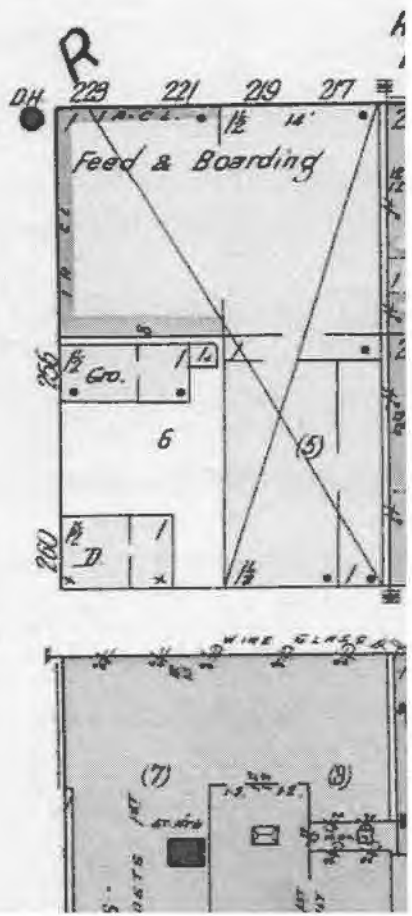
1905



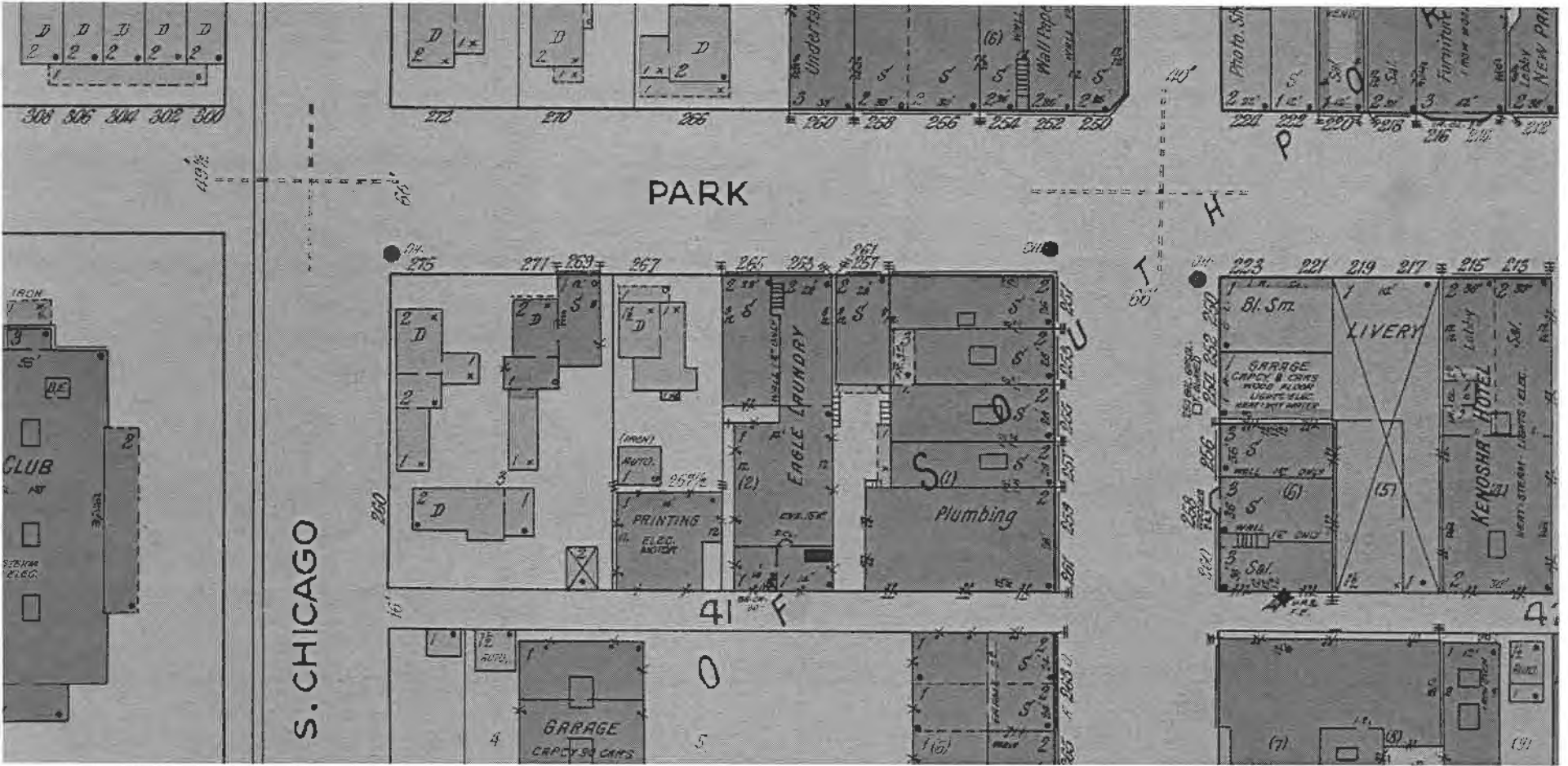
S. CHICAGO



CHURCH



1911



1918



1949



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**Site Investigation Field Procedures Workplan - METCO
Rosselli Dry Cleaning**

APPENDIX F/ HEALTH AND SAFETY PLAN

**Site Investigation Field Procedures Workplan
Rosselli Dry Cleaning**

Safety Plan Information

Company Name: METCO

Contact Information: Eric Dahl
1601 Caledonia Street, Suite C
La Crosse, WI 54603
(608) 781-8879

Site Information

METCO Project #: C2934

Site Name: Rosselli Dry Cleaning
Site address: 715 57th Street
Kenosha, WI 53140

County: Kenosha

WDNR Contact: Paul Grittner
141 NW Barstow Street
Waukesha, WI 53188
(414) 405-0764

WDNR BRRTS #: 02-30-586299

Purpose of Activity (Check all that apply)

- | | |
|---|-------------------------------------|
| Petroleum Release Investigation | <input type="checkbox"/> |
| Dry Cleaner Chemical Release Investigation | <input checked="" type="checkbox"/> |
| Install Soil Borings/Monitoring Wells | <input checked="" type="checkbox"/> |
| Tank/Piping Removal | <input type="checkbox"/> |
| Tank/Piping Closure Assessment | <input type="checkbox"/> |
| Phase 1/Phase 2 Environmental Site Assessment | <input type="checkbox"/> |
| Install Remedial System | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

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 Rosselli Dry Cleaning**

Potential Health and Safety Hazards (Check all that apply)

Handling/Transfer of Product (Fire, Explosions)	<input type="checkbox"/>
General Construction (Electrical Hazards, Physical Injury)	X
Confined Space Entry (Explosions)	<input type="checkbox"/>
Heavy Equipment	X
Noise	X
Underground and Overhead Utilities	X
Site Traffic	X
Oxygen Depletion	<input type="checkbox"/>
Excavation (Cave Ins, Falls, Slips)	<input type="checkbox"/>
Poisonous Plants	<input type="checkbox"/>
Snakes, Insects, Rodents	<input type="checkbox"/>
Heat, Cold	X
Other	<input type="checkbox"/>

Evaluation of Chemical Hazards

Name	Physical State	Route of Entry	TWA/STEL (ppm)	Symptoms of Exposure
Tetrachloroethene	Vapor/ Liquid	Inhalation/Absorption /Ingestion/Contact	100/200	Irritation, Nausea, Flushing, Dizziness, Drowsiness, Liver Damage

On-Site Personnel Responsibilities

<u>Team Member</u>	<u>Responsibility</u>
1. Ron Anderson	Senior Project Manager
2. Eric Dahl	Site Project Manager
3. Robert Wilmoth	Hydrogeologist

**Site Investigation Field Procedures Workplan
 Rosselli Dry Cleaning**

Method to Control Potential Health and Safety Hazards

Monitoring Instruments

Photoionization Detector (PID)	X
Flame Ionization Detector (FID)	
Combustible Gas Indicator	
Four Gas Meter	
Detector Tubes	

Action Levels

0-10% LEL (No Explosion Hazard)
 Oxygen Deficient (Less Than 21%)
 Oxygen Deficient (Less Than 19%)

Action

None
 Notify Health & Safety Officer
 Evacuate

Personal Protective Equipment

Minimum Requirements:

1. Hardhat
2. Safety Glasses/Goggles
3. Steel Toe Shoes or Boots
4. Flame Retardant Coveralls
5. Hearing Protection (Muffs or Ear Plugs)
6. Nitrile Gloves

Is additional PPE required? No

Additional Requirements

Uncoated Tyvek Coveralls	
Saranex Tyvek Coveralls	
Rubber Boots	
Overboots	
Surgical Inner Gloves	
Butyl Neoprene/Nitrile Outer Gloves	
Full Face Respirators	
Type of Cartridge:	
SCBA/SAR	
Other	

Level of Protection Designated: D

**Site Investigation Field Procedures Workplan
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Site Control

Work Zones

Support Zone: Beyond a 25 foot radius of drilling or excavation and upwind of operation.
Contamination Reduction Zone: Between 15 and 25 foot radius of drilling or excavation.
Exclusion Zone: Within 15 foot radius of of drilling or excavation.

Site Entry Procedure: Obtain all approval and instructions from project manager.

Decontamination Procedures:

Personnel: Remove protective equipment and wash hands prior to eating.
Equipment: Wash with brush and Alconox soap, rinse with fresh tap water.

Work Limitations: Daylight hours. No eating, drinking, or smoking in the exclusion zone or contamination reduction zone.

Employee Limitations:

Site Resources:

Shower	<input type="checkbox"/>
Water Supply	<input checked="" type="checkbox"/>

Contingency Planning

<u>Emergency Contacts</u>	<u>Phone Number</u>
Ambulance: Kenosha	911
Hospital Emergency Room: Froedtert Kenosha Hospital	(262) 656-2011
Poison Control Center: Milwaukee	(800) 222-1222
Police: Kenosha	911
Fire Department: Kenosha	911
Hazardous Waste Response Center: Wisconsin	(800) 943-0003
EPA	(800) 424-8802

Location Address: 715 57th Street, Kenosha, WI 53140

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Hospital: Froedtert Kenosha Hospital
6308 8th Avenue
Kenosha, WI 53143
(262) 656-2011

Emergency Route:

- Travel west on 57th Street ½ block to 8th Avenue.
- Turn left onto 8th Avenue.
- Travel south on 8th Avenue 4 blocks to 61st Street.
- Turn left onto 61st Street.
- Travel east on 61st Street ½ block to 8th Avenue.
- Turn right onto 8th Avenue.
- Travel south on 8th Avenue 2 blocks and hospital will be on right.

Emergency Procedures:

If an emergency develops at the site, the discoverer will take the following course of action:

- Notify the proper emergency service (fire, police, etc.) for assistance.
- Notify other personnel on the site. Notify project manager.
- Contact METCO and the client representative to inform them of the incident as soon as possible.
- Prepare a summary report of the incident for METCO and the client representative.

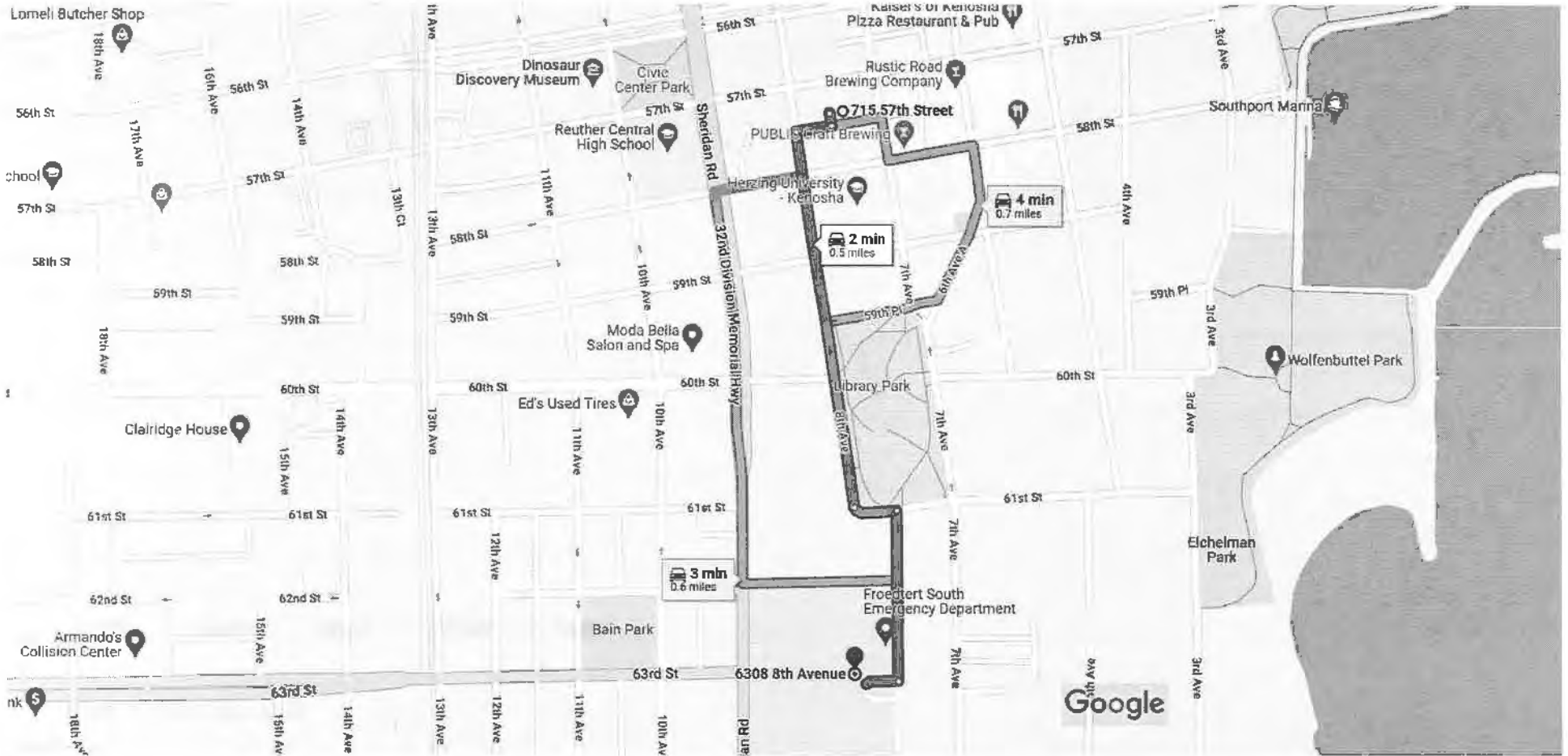
On-Site Organization

Phone Numbers

METCO Project Manager: Eric Dahl	work	(608) 781-8879
	cell	(608) 780-6187
METCO Safety Officer: Brian Hora	work	(800) 236-0448
	cell	(608) 604-2933
METCO Corporate Contact: Paul Knower	work	(800) 236-0448
	cell	(608) 604-2931
Client Contact: David Thornton		(262) 331-4121

Daily Safety Plan Check

1. Hard Hat
2. Visible Fire Extinguisher
3. Safety Glasses
4. Hearing Protection
5. No Smoking On Site
6. Safety Data Sheet
7. Route to Hospital
8. Barricades (Cones, Flags, Fences, Vehicle)
9. Emergency Phone Numbers
10. Know Where the Site Safety Plan Is



Map data ©2022 200 ft



via 8th Ave

2 min

Fastest route now due to traffic conditions

0.5 mile

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APPENDIX G/ QUALIFICATIONS

**Site Investigation Field Procedures Workplan
Rosselli Dry Cleaning**

Ronald J. Anderson, P.G.

Professional Titles

- Senior Hydrogeologist
- Project Manager

Credentials

- Licensed Professional Geologist in Wisconsin
- Licensed Professional Geologist in Minnesota
- Recognized by the State of Wisconsin Department of Natural Resources (Chapter NR712) as a qualified Hydrogeologist
- Certified tank closure site assessor (#41861) in Wisconsin
- Member of the Wisconsin Groundwater Association
- Member of the Minnesota Groundwater Association
- Member of the Federation of Environmental Technologist, Inc.

Education

Includes a BA in Earth Science from the University of Minnesota-Duluth. Applicable courses successfully completed include Hydrogeology, Applied Hydrogeology, Environmental Geology, Geological Field Methods, Geology Field Camp, Geomorphology, Structural Geology, Stratigraphy/Tectonics, Mineralogy/Petrology, Glacial/Quaternary Geology, Geology of North America, Oceanography, General Chemistry, Organic Chemistry, and Environmental Conservation.

Post-Graduate Education

Includes Personnel Protection and Safety, Conducting Comprehensive Environmental Property Assessments, Groundwater Flow and Well Hydraulics, Effective Techniques for Contaminated Groundwater Treatment, and numerous other continuing education classes and conferences.

Work Experience

Includes nine months with the Wisconsin Department of Natural Resources Leaking Underground Storage Tank Program regulating LUST sites and since June 1990, with METCO as a Hydrogeologist and Project Manager. Duties have included: managing, conducting, and reporting tank closure assessments; property assessment, LUST investigations; spill investigations; agricultural chemical investigations, dry cleaning chemical investigations, general geotechnical/environmental investigations; Geoprobe projects (soil, groundwater, soil gas sampling); drilling projects (soil boring and monitoring wells); and remedial projects. Since 1989, METCO has sampled/consulted over 1,465 environmental sites.

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Eric J. Dahl

Professional Title

- Hydrogeologist

Credentials

- Recognized by the State of Wisconsin Department of Natural Resources (Chapter NR712) as a qualified Hydrogeologist.

Education

Includes B.S. in Geology from the University of Wisconsin-Eau Claire. Applicable courses successfully completed include Environmental Geology, Physical Hydrogeology, Chemical Hydrogeology, Computer Modeling in Hydrogeology, Aqueous Geochemistry, Field Geology I and II, Mineralogy and Petrology I and II, Sedimentology and Stratigraphy, Petroleum and Economic Geology, Earth Resources, Earth History, and Structural Geology.

Post-Graduate Education

40-hour OSHA Hazardous Materials Safety Training course with 8-hour refresher course.

Work Experience

With METCO since November 1999 as a Hydrogeologist. Duties have included: Site Investigations, Phase I and Phase II Environmental Site Assessments, Case Closure Requests/GIS Registry, Geoprobe projects (oversight, direction, and sampling), drilling projects/monitoring well installation (oversight, direction, and sampling), soil excavation projects (oversight, direction, and sampling), Geoprobe operation, and operation and maintenance of remedial systems.

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Thomas P. Pignet, P.E.

Professional Titles

- Chemical Engineer
- Industrial Engineer

Credentials

- Licensed Professional Engineer in Wisconsin

Education

Undergraduate: B.S. in Chemical Engineering from the University of Wisconsin. Applicable courses include the standard chemistry curriculum - basic, physical, organic, etc. - plus engineering transport phenomena, chemical unit operations (e.g. separations), fluid mechanics, etc.

Post-Graduate Education

Ph.D. in Chemical Engineering from the University of Minnesota - with applicable special training in absorption & catalysis; M.S. in Industrial Engineering from the University of Wisconsin - Milwaukee - with special emphasis on statistical techniques and data analysis. Applicable further training: continuing education, semester-length courses in [1] Understanding Environmental & Safety Regulation; [2] Hazardous & Toxic Waste Management; and a number of 1-2 day workshops - Fire & Explosion Safety; Small Quantity Generations of Hazardous Waste.

Work Experience

Includes ten years as a research chemical engineer with a large chemical manufacturer; one year as process development engineer and demonstration-scale test analyst on a unique coal gasification project; ten years in association with UW-M, teaching and consulting to industry on energy efficiency, waste minimization and productivity improvement. One year working with a small engineering consulting firm on energy, environmental, and process improvement projects, including LUST Investigations and Remediations. With METCO since February 2000. Duties include Remedial Action Plan preparation, pilot test design and performance, remedial systems design and implementation, and general management of METCO's remedial projects.

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Robert Wilmoth

Professional Title

- Hydrogeologist

Credentials

- Recognized by the State of Wisconsin Department of Natural Resources (Chapter NR712) as a qualified Hydrogeologist

Education

Includes B.S. in Geology and Environmental Sciences from the University of Wisconsin – Eau Claire. Applicable courses successfully completed include Physical and Applied Chemical Hydrogeology, Geochemistry, Mineralogy and Petrology I and II, Glacial Geology, Sedimentology and Stratigraphy, Earth History, Computer Modeling in Geology, Geologic Field Mapping (Field Camp), Water Resources, Earth Resources, and Geographic Informational Systems.

Post-Graduate Education

- 40-hour OSHA Hazardous Materials Safety Training course with 8-hour refresher course.
- OSHA 10 Hour Construction Safety and Health

Work Experience

With METCO since April 2019 as Hydrogeologist. Duties have included: Site Investigations, Phase I and Phase II Environmental Site Assessments, Case Closure Requests/GIS Registry, Geoprobe projects (oversight, direction, and sampling), drilling projects/monitoring well installation (oversight, direction, and sampling), and operation and maintenance of remedial systems.

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APPENDIX H/ LIST OF ACRONYMS

AST - Aboveground Storage Tank
ASTM - American Society for Testing and Materials
Cd - Cadmium
DOT - Department of Transportation
DRO - Diesel Range Organics
ES - Enforcement Standards
gpm - gallons per minute
GRO - Gasoline Range Organics
ID - inside-diameter
LAST - Leaking Aboveground Storage Tank
LUST - Leaking Underground Storage Tank
MSL - Mean Sea Level
MTBE - Methyl-tert-butyl ether
MW - Monitoring Well
NIOSH - National Institute for Occupational Safety & Health
NR - Natural Resources
OD - outside-diameter
PAH - Polynuclear Aromatic Hydrocarbons
PAL - Preventive Action Limits
Pb - Lead
PID - Photoionization Detector
POTW - Publicly Owned Treatment Works
ppb ug/kg - parts per billion
ppm mg/kg - parts per million
psi - pounds per square inch
PVC - Polyvinyl Chloride
PVOC - Petroleum Volatile Organic Compounds
RAP - Remedial Action Plan
scfm - standard cubic feet per minute
SVE - Soil Vapor Extraction
USCS - Unified Soil Classification System
USGS - United States Geological Survey
UST - Underground Storage Tank
VOC - Volatile Organic Compounds
WDNR - Wisconsin Department of Natural Resources
WPDES - Wisconsin Pollutant Discharge Elimination System