



January 28, 2021

James M. Hansberry
Executive Vice Chairman
1670 Northrock Court
Rockford, Illinois 61125-0066

Transmitted via electronic mail

Subject: "No Action Required" Determination Not Approved, per Wis. Admin. Code NR § 716.05(2).
Retail Wholesale Store, 1305 N. Johns St. Dodgeville, Wisconsin
BRRTS#: 02-25-587099

Dear James M. Hansberry:

Purpose

The purpose of this letter is to provide you with clarifications as to the environmental liabilities at the Retail Wholesale Store (the Site). The Department of Natural Resources (Department) received the fee for providing assistance, in accordance with Wis. Admin. Code § NR 749.04(1).

Request

On November 13, 2020, Richard Mazurkiewicz of Ramboll requested, on your behalf, that the Department issue a liability clarification letter under Wis. Stat. § 292.55. Specifically, the Department was requested to review the site and decide if a No Action Required (NAR) determination, under Wis. Admin. Code § NR 716.05 (2), was warranted for this site at this time

In order to make this determination, the Department has reviewed information regarding both the subject site and the surrounding properties. The following submittals were reviewed:

- Retail Wholesale Store, No Action Required Request, November 5, 2020
- Silicon Sensor, Summary of Results, Phase I Dodgeville VOC Contamination Investigation, February 12, 1992
- Silicon Sensor, Dodgeville VOC Contamination Investigation Report, August 6, 1993
- Silicon Sensor, Field Investigation of Soil Conditions and VOC Concentrations at Silicon Sensors, March 1987
- United Parcel Service, Continuing Obligations Packet, March 2010

The November 5, 2020 No Action Required Request details the environmental investigation on Site to date. The investigation on Site thus far has included 3 soil borings. Soil sample locations were chosen based on areas of potential historical chlorinated volatile organic compound (CVOC) use and storage. Six sub-slab vapor samples were also taken; sample locations were chosen to be representative of the entire building with a focus around the historical location of the former dry-cleaning machine. The results of the sub-slab vapor sampling showed vapors from tetrachloroethylene at levels of regulatory concern.

Summary Determination

A NAR determination is not approved for the Site at this time. Information reviewed by the Department indicates that the property owner is responsible for the discharge of a hazardous substance or other environmental pollution at the above-described site. Preliminary data suggests that further investigation is warranted to characterize the source and the impact of the contamination. The Site should continue through the Wis. Admin. Code § NR 700 process as described in the August 28, 2020 RP Letter.

Special Vapor Intrusion Concern with Trichloroethylene:

Contamination that includes trichloroethylene (“TCE”), a chlorinated solvent and common degreaser, is of special concern from a human health perspective due to its potential for acute (short-term) health risks at relatively low concentrations in air. TCE is also a breakdown product of tetrachloroethylene (“PCE,” also known as “Perc”), a historically common dry-cleaning chemical. Vapors can travel from contaminated soil or groundwater and along preferential pathways, such as within sewer lines, and enter occupied buildings. This is known as vapor intrusion (VI). Screening for VI must be conducted at every contaminated site in Wisconsin, as defined in Wis. Admin. Code § 716.11 (5) (a). **However, when TCE is present, screening for VI should be made a priority and an interim action under Wis. Admin. Code § NR 708.11 may be necessary.** For an overview on VI, see *What is Vapor Intrusion?* (RR-892). For more information, go to dnr.wi.gov and search “vapor.” Additional technical guidance on VI is available in *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, (RR-800).

Liability Determination

Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700-754 require those who are responsible for a hazardous substance discharge or environmental pollution to take actions necessary to respond to the contamination.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the beginning of this letter. The Department tracks information on all case determinations such as this letter in a Department database that is available online at dnr.wi.gov and search: “BOTW”.

If you have any questions, please contact the Project Manager, Caroline Rice at (608) 219-2182 or by email at caroline.rice@wisconsin.gov.

Sincerely,



Steven L. Martin, P.G.
South Central Region, Team Supervisor
Remediation and Redevelopment Program

cc: Marla Mitchell, Trace-Mitchell Real Estate LLC
Richard Mazurkiewicz, [rmazurkiewicz@Ramboll.com]