



April 5, 2022

Mr. Tom Schafer
4300 Oak LLC
2551 North Wahl Avenue
Milwaukee, WI 53081
Via *Electronic Mail Only* to tschafer@wi.rr.com

Subject: Technical Assistance Request
Shirton Inc. DBA Shorewood Queensway Cleaners, 4300 North Oakland Avenue, Shorewood,
WI
BRRTS #s 02-41-552089 and 03-41-586899; FID # 241094590

Dear Mr. Schafer:

On February 8, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Results and Remedial Action Documentation Report* (Report) submitted by your consultant Ken Ebbott from Sand County Environmental, Inc. for the site mentioned above. The site includes two open activities: an Environmental Repair Program (ERP) activity BRRTS # 02-41-552089 for the tetrachloroethylene (PCE) discharge from the dry cleaner operations and a leaking underground storage tank (LUST) activity BRRTS # 03-41-586899 for the petroleum discharge. A technical assistance fee was submitted with the Report for the DNR's review and response to four questions in the Report. The DNR provides our responses to the questions below.

1. Agreement that the site investigation for solvents and petroleum is complete.

ERP Activity

The site investigation report (SIR) for the ERP activity was approved by the DNR in 2015. The remedial actions completed at the site are currently being monitored. The DNR concurs that the soil investigation is complete.

LUST Activity

Three underground storage tanks (USTs) were encountered during the remedial excavation for the ERP activity. The tanks included one 500-gallon unleaded gasoline tank, one 1,000-gallon unleaded gasoline tank and one presumed 500-gallon heating oil tank. The gasoline tanks were located on the south side of the site while the heating oil tank was located next to the former dry cleaner building. The tanks appear to be associated with the use of the site as a gas station in the 1950s prior to the dry cleaning operations. All USTs were removed and disposed offsite. A tank-system site assessment (TSSA) was conducted to document the removal of the tanks. Laboratory analysis of the TSSA soil samples were below detection limits for volatile organic compounds (VOCs) and below the background threshold value for lead. The DNR concurs that the soil investigation is complete.

The DNR has received the TSSA report and site investigation work plan for this LUST activity. At this time, your consultant should submit an SIR for the petroleum discharge per Wis. Admin. Code § NR 716.15(1).

2. Concurrence that previously completed investigations conducted into utility migration pathways and vapor migration are adequate.

The DNR concurs that the investigations into utility migration pathways and vapor migration are complete.

3. Agreement that testing for PFAS at this site is not warranted, due to historic minimal use of only aerosol waterproofing products.

The DNR is requiring PFAS sampling since the discharge of the PCE appears to be associated with the waste stream, and the discharge was significant. Groundwater samples are requested from wells with the highest and lowest chlorinated volatile organic compound (CVOC) concentrations.

4. Estimation of the number of additional groundwater sample events and timing needed to support stable to decreasing contaminant trends in the post-remediation groundwater per NR 700 closure requirements.

ERP Activity

Additional rounds of groundwater sampling are required to be collected to establish a decreasing or stable trend. The last round of groundwater sampling at MW-9 identified PCE above its Wis. Admin. Code ch. NR 140 enforcement standard (ES). The previous round was below the ES. A groundwater monitoring well may be needed downgradient if the concentrations of PCE remain elevated. All wells should be surveyed with each groundwater sampling event to determine groundwater flow direction.

LUST Activity

Groundwater monitoring well MW-10 was installed in the gasoline tank excavation cavity after removal of the two gasoline USTs. Additional groundwater sampling is needed to establish a decreasing or stable trend. The DNR concurs that the continued removal of the free product from MW-10 is appropriate.

ES exceedances were identified in the last round of groundwater samples collected at MW-3R, MW-5R, MW-9 and MW-10. To close a site with ES exceedances in groundwater, the site must comply with Wis. Admin. Code § NR 726.05(6).

DNR Comments

1. It is the DNR's understanding that the northern footing wall of the dry cleaner building was left in place during razing of the dry cleaner building. The footing wall extends 6.5 feet below ground surface and is located a foot from the offsite 4312 North Oakland Avenue building basement wall. The wall was left in place to preserve the structural integrity of that building. This footing should be considered a structural impediment to the remediation when case closure is requested.
2. Confirmation is needed that the owner of the Oakland Avenue right-of-way has been notified of the contamination.
3. Operation of the vapor mitigation system shifts to the current owner at the time of closure.
4. A future vapor risk continuing obligation will be needed for both the ERP and LUST activities and affected properties with vapor mitigation systems.

Next Steps

Within 60 days of the date of this letter by June 5, 2022, respond in writing with a schedule of your plans to meet these requirements. Once the additional work has been completed, the DNR requests submittal of a Post-Remedial Investigation Addendum for the ERP Activity to demonstrate that the applicable requirements have been met. An SIR is required to be submitted for the LUST activity. Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact the project manager Alice Egan at 414-639-4007 or at alice.egan@wisconsin.gov

Sincerely,



Alice Egan
Hydrogeologist
Remediation & Redevelopment Program

cc: Ken Ebbott, Sand County Environmental, Inc. – ken.ebbott@sandcountyenv.com