Prepared for:
Trace-Mitchell Real Estate, LLC

Prepared by:
Ramboll US Consulting, Inc.
Milwaukee, Wisconsin

Date:
March 18, 2021

Ramboll Project:
1690020998

NR 716 SITE INVESTIGATION WORK PLAN

RETAIL STORE
1305 NORTH JOHNS STREET
DODGEVILLE, WISCONSIN

BRRTS: 02-25-587099

RAMBOLL

ENVIRONMENT
& HEALTH

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APPENDIXES

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CERTIFICATION

I, Jeanne Tarvin, hereby certify that I am a hydrogeologist as that term is defined in NR 712.03(1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to NR 726, Wis. Adm. Code.

Jeanne M. Tarvin, PG, CPG
License No. G-307-13

March 18, 2021
Date

NR 716 SITE INVESTIGATION WORK PLAN

RETAIL STORE
1305 NORTH JOHNS STREET
DODGEVILLE, WISCONSIN

BRRTS NO: 02-25-587099 and 07-25-586850

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Date: March 18, 2021

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Date: March 18, 2021

1. INTRODUCTION

Ramboll US Consulting, Inc. (Ramboll) submits this Wisconsin Administrative Code (WAC) NR 716 Site Investigation Work Plan (SI WP) for proposed investigation activities at the Trace-Mitchell Real Estate, LLC property located at 1305 North Johns Street, Dodgeville, Iowa County, Wisconsin (the "Site"). The Site location is presented on **Figure 1**. The Site layout depicting the Site features is presented on **Figure 2**.

This SI WP was developed based on a January 28, 2021 letter from the Wisconsin Department of Natural Resources (WDNR) in response to Ramboll's November 13, 2020 No Action Required (NAR) request. The January 2021 WDNR letter states that the "*Site should continue through the Wis. Admin. Code § NR 700 process as described in the August 28, 2020 RP Letter.*" The January 2021 WDNR letter is provided in **Appendix A**. The scope and detail of the site investigation will be performed according to the requirements outlined in WAC NR 716 and includes activities discussed with the WDNR project manager, Caroline Rice. The proposed site investigation will assist in defining the nature, degree, and extent of contamination; define the source or sources of contamination; determine the need for an interim and/or remedial action; and provide information needed to select an interim and/or remedial action.

1.1 Site Location

The Site is located in the southeast ¼ of the southwest ¼ of Section 22, Township 06N, Range 03E of the Public Land Survey System. The Site is bounded by a commercial property (north); undeveloped greenspace (east); Brown Street (south); and North Johns Street (west). The Parcel ID number and legal description obtained from the Iowa County Land Records Web Portal is as follows:

Parcel 216-1313

Wisconsin Transverse Mercator coordinates - X: 509679; Y: 278215

Legal Description

LOT 16 BLOCK 2 BROWN'S SUBDIVISION EXC THAT PT OF SAID LOT 16 DESC AS BEG AT THE SW CORNER OF SAID LOT 16, TH N 28 DEG 57'08"W ALONG THE EASTERLY R.O.W. OF JOHNS ST, 32.25', TH S 68 DEG 33'20"E, 41.85', TH S 61 DEG 02'52"W ALONG THE SOUTHERLY R.O.W. LINE OF BROWN ST 26.68' TO THE POB

1.2 Involved Parties

Responsible Party/Site Owner/Operator:	Marla Mitchell Trace-Mitchell Real Estate, LLC 3903 Berg Road Dodgeville, WI 53533 Site Contact: Marla Mitchell, 608.574.5382 mommamitchell@charter.net

Environmental Consultant:	Ramboll US Consulting, Inc. 234 West Florida Street, Fifth Floor Milwaukee, WI 53204 Contact: Richard Mazurkiewicz, 262.901.3502, rmazurkiewicz@ramboll.com
Agency:	Wisconsin Department of Natural Resources 3911 Fish Hatchery Road Fitchburg, WI 53711 Contact: Caroline Rice, 608-219-2182, caroline.rice@wisconsin.gov

2. BACKGROUND

The Site is located on the northeast corner of North Johns Street and Brown Street. The current single-story building was constructed in 1982 on land totaling 0.37 acre. There is one, one-story, building on the Site with a storage shed located at the northwest corner. The on-Site building is approximately 5,000 square feet and built as a slab on grade foundation. Historically, the building housed dry-cleaning operations from approximately 1982 to 2003. Reportedly, the one dry-cleaning machine was a self-contained/closed loop systems. The building is currently occupied by NAPA Auto Parts, which is a retail store for automotive supplies (parts, tools, paint, etc.).

In June 2020, AEI Consultants, Inc. prepared a Phase I Environmental Site Assessment (ESA; the "2020 Phase I ESA report") for a potential sales transaction. The 2020 Phase I ESA report concluded that "This assessment has revealed no evidence of Recognized Environmental Conditions (RECs) or Controlled Recognized Environmental Conditions in connection with the Site, except for the following:

- Former Dry-Cleaner - Based on a review of historical records, a dry-cleaning facility was located on the Site from approximately 1982 to 2003. Dry-cleaning operations typically use chlorinated solvents, particularly tetrachloroethene (PCE), during the dry-cleaning process. These solvents, even when properly stored and handled, can readily migrate into the subsurface due to small releases associated with on-Site operations. Chlorinated solvents are highly mobile chemicals that can easily accumulate in soil and soil gas and migrate to groundwater beneath a facility. However, according to the prior owner, Mr. Charlie King, the dry-cleaning operations used solvent-based chemicals in a closed-loop system machine. No known subsurface investigation has been performed on the Site. Based on this information, the former presence of a dry-cleaning operation on the Site represents evidence of a REC.

The June 2020 Phase I ESA report also identifies the presence of an area-wide chlorinated volatile organic compound (cVOC) groundwater plume in the area. The source of the cVOC groundwater plume is the adjacent east and northeast property (located at 305 County Highway YZ, Dodgeville, Wisconsin), which is currently the location of the Humane Society. This adjacent site is listed as closed Bureau of Remediation and Redevelopment Tracking System (BRRTS) case 02-25-001456 (Advanced Photonix Inc/Silicon Sensors). A copy of the 2020 Phase I ESA report was provided as Attachment B in Ramboll's November 13, 2020 NAR. The following paragraphs summarize Ramboll's review of the BRRTS case 02-25-001456 based on available on-line documentation.

Based on the WDNR BRRTS website[1], the Silicon Sensors site had a release of trichloroethene (TCE) in the late 1980s, and that TCE was used as weed control on the property. According to a 1992 *Phase I Dodgeville VOC Contamination Investigation* report prepared by STS Consultants Ltd (STS), multiple sampled wells in the area, Dodgeville municipal well No 7 (DMW-7), private wells in the area and 11 monitoring wells installed during a previous investigation in 1988-1989. Groundwater samples were analyzed for volatile organic compounds (VOCs). The monitoring wells closest to the Site, W-8 and Dave Baker Chevy and Buick private well, were located on the east and north adjoining properties, respectively. In June 1991, W-8 had groundwater detections of 1,1-dicloroethene (1,1-DCE) at 110 micrograms per liter (µg/L), 1,2-dichloroethane at 5.3 µg/L, PCE at 148 µg/L[2], and TCE at 2900 µg/L. The latest sampling according to the 1992 STS report was conducted on November 20, 1991, at the Dave Baker well, and PCE was detected at 48[3] µg/L, 1,1,1-trichloroethane at 4.1 µg/L, and TCE at 200 µg/L.

The 1992 STS report identified multiple sources of contamination. A plume containing 1,1-DCE, 1,2-dichloroethane, PCE and TCE is present in the vicinity of Dave Baker Chevrolet and monitoring well W-8. A second plume consisting primarily of carbon tetrachloride appears to be centered around monitoring well W-3 and extends northward beyond W-1 and southward beyond the Township Garage. A third plume consisting primarily of TCE exists around the Township Garage, the Site, and Skip's and appears to extend northward to DMW No 7. Silicon Sensors was identified as the source of cVOC contamination around W-8 and the Dave Baker well. The second plume appears associated with the Joe King Landfill near W-3, which was the center of a carbon tetrachloride plume. The W-3 well is located approximately 880 feet northwest of the Site. No carbon tetrachloride was detected in either well near the Site.

STS identified an area-wide cVOC groundwater plume and recommended installing additional monitoring wells to determine vertical and horizontal extent of contamination. The groundwater table was documented to be present in bedrock at 51 feet below ground surface (bgs) with groundwater flow to the southeast.

According to a subsequent 1993 Dodgeville VOC Contamination Investigation Report prepared by STS, additional investigative work focused on areas near Silicon Sensors, Municipal Well No. 7 and the Joe King Landfill. In June 1993, all groundwater monitoring wells, private wells and DMW-7 were sampled. In the June 1993, W-8 1,1-DCE at 12 µg/L, PCE at 130 µg/L[4], and TCE at 13,000 µg/L. At the Dave Baker well, PCE was detected at 83 µg/L[5], 1,1,1-trichloroethane at 23 µg/L, and TCE at 510 µg/L. Based on data from 1991 and 1993, STS identified a shallow TCE plume located in the area of W-8 and the Dave Baker well. The vertical and horizontal extent of these plumes were not defined in this investigation. The NR 140 TCE enforcement standard (ES) was exceeded in samples collected from the Dave Baker and W-8 wells. PCE was detected in both the Dave Baker well and Monitoring Well W-8 in both 1991 and 1993.

Historically, TCE concentrations decreased in W-8 from 1989 to 1993 and increased in the Dave Baker Chevrolet well from 1991 to 1993. STS concluded in the 1993 report that the plume may be extending vertically and/or horizontally away from the Silicon Sensors source area. STS

[1] https://dnr.wi.gov/botw/SetUpBasicSearchForm.do

[2] A concentration of PCE at 148 µg/L is equivalent to 148,000 micrograms per cubic meter (**Appendix B**; becomes relevant later and will be discussed in the Site Investigation Report).

[3] A concentration of PCE at 48 µg/L is equivalent to 48,000 micrograms per cubic meter (**Appendix B).**

[4] A concentration of PCE at 130 µg/L is equivalent to 130,000 micrograms per cubic meter (**Appendix B).**

[5] A concentration of PCE at 83 µg/L is equivalent to 83,000 micrograms per cubic meter (**Appendix B).**

recommended that the potential source of contaminants in the unsaturated zone at Silicon Sensors be delineated and remediated. No further documentation related to investigation work is in the BRRTS file.

On October 25, 2006, the Silicon Sensors site received a closure letter from the WDNR. The letter stipulates that an asphalt cap should be maintained over the impacted area and the soils must not be disturbed.

Vapor sampling was conducted in March 2019 at the Iowa County Humane Society/Former Silicon Sensors (305 County Road YZ). Five vapor samples were collected; two soil gas samples and three sub-slab samples. The samples were analyzed for VOCs. Although no compounds were detected at concentrations exceeding the commercial Vapor Risk Screening Levels (VRSLs) for the samples media/location, PCE was detected in both of the soil gas samples and in two of the sub-slab vapor samples. Three compounds were present above the indoor air vapor action level standard. These included TCE and acrolein in soil gas at SG-1 and chloroform in sub-slab vapors at SS-3.

Based on Ramboll's review of the above information, the extent of groundwater contamination was not defined and well W-8, which is located 200 feet east of the Site, had elevated cVOCs including PCE and TCE in 1993 (the last sampling round based on the BRRTS document review). Therefore, Ramboll concluded that there is a potential that the area-wide cVOC groundwater impacts may be a source of vapor risk to the Site.

On July 7, 2020, Ramboll (on behalf of Motor Parts & Equipment Corporation) completed a limited Phase II ESA, based on review of the historical site investigation activities and focusing on the historical use of the Site as a dry-cleaner. Ramboll advanced three shallow soil borings in the northeast portion of the building, where historical dry-cleaning operations occurred. Shallow soils consisted of brown sand and gravel fill down to 1 to 2.5 feet bgs with silty-clay beneath. There were minimal PID measurements in soil samples collected from all three borings (the highest were observed in soil samples collected from boring SB-1, located near the drain inside the building). There were only three VOC analytes detected, dichlorodifluoromethane (DCDFM), ethylbenzene and styrene, however, not at concentrations above the NR 720 Residual Contaminant Levels (RCLs). The detected analytes were only present in the soil sample collected from boring SB-1 (located near the drain inside the building). These analytes appear to be related to current Site use activities and building materials and are not indicative of historical dry-cleaning operations. The VOCs were not detected in samples collected from borings SB-2 (located outside the garage door at the northwest corner of the building) and SB-3 (located outside the shed door near the northwest corner of the building).

Additionally, on July 7, 2020, Ramboll installed and sampled six temporary sub-slab Vapor Pins™ in locations to represent the entire slab-on-grade building floor (with extra Vapor Pins™ located at the former dry-cleaning area, located at the northeast corner of the building). Three VOC analytes (PCE, ethylbenzene and DCDFM) were detected above residential sub-slab VRSLs. The concentrations of PCE and ethylbenzene were below the applicable small commercial building VRSLs. Only DCDFM was detected at concentrations above the small commercial VRSL (in all six sub-slab vapor samples). However, the DCDFM found in the sub-slab soil vapor samples is likely related to a building material, insulating foam (foamboard was observed beneath the concrete slab in boring SB-1), and not to a release or discharge of a hazardous chemical to the environment.

On August 28, 2020, Ramboll submitted a Notification for Hazardous Substance Discharge to the WDNR for the Site, based on the results of the sub-slab residential VRSL exceedances. Subsequently

the WDNR issued a Responsible Party Letter to Trace-Mitchell Real Estate, LLC on October 5, 2020, assigning BRRTS case number 02-25-587099 to the Site.

Ramboll submitted a NAR request to the WDNR on November 13, 2020. In a letter dated January 28, 2021, the WDNR denied Ramboll's NAR request stating that a site investigation is required to assess the origin of the PCE vapors beneath the building at the Site. The remainder of this report presents Ramboll's SI WP for the Site.

3. PHYSICAL SETTING

An evaluation of the physical setting of the Site was completed to assess the potential for migration of hazardous substances and/or VOCs onto the Site from one or more off-Site source(s) and to assess the potential for releases on the Site to impact groundwater, soil, and soil gas.

3.1 Topography

Based on the topographic map (**Figure 1**), the surface elevation of the Site is at approximately 1,240 feet above Mean Sea Level. The Site appears relatively level. No surface water bodies are on the Site.

3.2 Hydrology

No potable or site investigation wells are currently present on the Site. However, according to the 1993 Dodgeville VOC Contamination Investigation Report prepared by STS, the water table is estimated to be about 51 feet bgs in the vicinity of the Site. The water table gradient (direction of groundwater flow) was estimated to be generally to the east-southeast, which follows the land surface topography in the area. The depth and gradient of the water table likely varies seasonally with changes in precipitation and may change significantly over time in response to development, including impervious surfaces, storm water controls, and pumping wells (domestic, industrial, or irrigation).

3.3 Geology/Soils

The Site lies in the unglaciated part of southwestern Wisconsin. According to the United State Department of Agriculture Web Soil Survey, the surficial geology in the vicinity of the Site consists of two units of the loess deposited Dodgeville silt loams. The Dodgeville silt loams consists of moderately eroded silt and silty clay loams at 0-2 percent slopes and 2-6 percent slopes. The silt loam overlies the Galena and Platteville dolomite bedrock formations. The depth the bedrock in the area likely varies. A well log (8EP556), which is located approximately 600 feet north of the Site, was obtained from the WDNR Well Construction reports website and indicates depth to bedrock was at 3 feet bgs (the log indicated clay from 0-3 feet below ground surface, Galena Dolomite 3-140 feet bgs, and Trenton Limestone 140-142 feet bgs.)

4. TECHNICAL STRATEGY AND SCOPE OF WORK

The technical strategy proposed is based on additional information required by the WDNR project manager, Caroline Rice, in January 2021 and items discussed in the January 2021 WDNR NAR response letter. Refer to **Figure 2** for the proposed sampling locations presented herein. As well as satisfying the standard NR 716 site investigation requirements, Ramboll's scope of work will focus on four objectives in particular:

1. Install and sample six sub-slab vapor probes at the previous sub-slab vapor sample locations

to verify that concentrations of PCE and ethylbenzene are still below the small commercial building sub-slab VRSLs (in comparison to Ramboll's July 2020 sub-slab soil vapor sampling). This sampling was already performed in order to collect the samples when the ground was still frozen and sub-slab soil vapors are likely to be the highest.

2. Install and collect soil samples from three soil borings to evaluate potential deeper chlorinated impacts in soil and to evaluate the primary soil type at the Site, which may provide a rationale that sub-slab soil vapors may be mitigated, e.g. if there is an adequate thickness of less transmissive soils like clay or clayey-silt.

3. Advance borings along the utility lines around the on-Site building to evaluate potential preferential pathways for vapor intrusion.

4. Complete a desktop study of groundwater flow at properties adjacent to the Site.

5. METHODS OF INVESTIGATION

5.1 Health and Safety

Prior to implementation of field activities, Ramboll will prepare a site-specific Health and Safety Plan (HASP) to address health and safety issues related to the proposed field activities. Ramboll will review the HASP with all field personnel prior to commencing the field activities. Ramboll will also prepare a COVID-19 safety plan that will comply with state and Center for Disease Control protocols.

5.2 Sub-Slab Soil Vapor Probe Installation and Sampling

Ramboll will perform a second round of sub-slab soil vapor sampling to confirm the results documented in July 2020, i.e. to verify the concentrations of PCE and ethylbenzene are below the applicable small commercial building sub-slab VRSLs, as they were in July 2020. The second round of soil vapor sampling was completed on March 12, 2021 to monitor potential seasonal variability and to address the detected PCE sub-slab vapor concentrations that were above the residential VRSL (in July 2020) but well below the applicable small commercial VRSL. Ramboll will install six sub-slab Vapor Pins™[6] (SS-1 through SS-6) at the same locations as the July 2020 sub-slab soil vapor sampling event at the Site. The locations of the proposed sub-slab vapor sampling points will cover the entire building (with four probes) and also focus around the former dry-cleaning machines that were formerly located near the northeast portion of the building (two additional sub-slab vapor sampling points). The locations of the proposed sub-slab vapor sample locations are depicted on **Figure 2**.

Ramboll will perform and document shut in (line leak) testing using a hand operated vacuum pump holding a vacuum of approximately 30 inches of mercury for 1 minute. Ramboll will also verify the Vapor Pin™ seal using the water dam method (i.e., sealing a piece of polyvinyl chloride tube with plumbers' putty to create a mote around the Vapor Pin™). If the water level stays static during the sub-slab soil vapor sampling, the Vapor Pin™ is considered adequately sealed. All sub-slab vapor samples will be analyzed for VOCs via United States Environmental Protection Agency (USEPA) Method TO-15. The Vapor Pins™ will be not be abandoned subsequent to the vapor sampling and will remain in place for potential future sampling.

[6] Vapor Pin™ is a registered trademark used by Cox-Colvin & Associates located in Plain City, Ohio.

5.3 Soil Boring Advancement and Screening

Ramboll proposes to advance three soil borings (SB-4, SB-5 and SB-6) to 20 feet bgs, or to bedrock (whichever is encountered first). The locations of the proposed soil borings are depicted on **Figure 2**. Prior to mobilization for drilling activities, Diggers Hotline will be contacted to mark out public utility locations on the Site. Likewise, Ramboll will contract with a private utility locator to clear any on-Site subsurface private utilities, structures, or obstructions within the immediate vicinity of the proposed boring locations.

All three borings will be advanced to evaluate potential deeper chlorinated impacts in soil and to evaluate the soil type at the Site. Borings SB-5 and SB-6 will be advanced along the utility lines leading to the on-Site building to evaluate potential preferential pathways for vapors (primarily PCE and ethylbenzene) to enter the building. The soil borings will be advanced using a direct push drill rig to collect soil samples. Soils will be continuously collected from polyvinyl chloride sleeves inside the direct-push (5 feet long, 2-inch diameter stainless steel) samplers. Soil characteristics will be recorded in the field and screened for total VOCs using a photoionization detector (PID) equipped with a 10.6 electron volt lamp. The PID will be calibrated and zeroed in the field according to manufacturer's instructions, using 100 parts per million isobutylene span gas and air (zero gas), and checked between each screening event for proper response. The PID readings and any organoleptic evidence of contamination will be recorded on boring logs. Up to two vadose zone soil samples will be collected from each boring, one from the depth interval showing the greatest evidence of impacts/highest PID reading and one from the soil boring termination depth. If no evidence of impacts are found, soil samples will be collected from the depth of the utilities and one from the soil boring termination depth. All soil samples will be analyzed for VOCs via USEPA Method 8260B.

5.4 Investigative Waste Management

Following soil sample collection activities, all soil borings will be properly abandoned with the soil cuttings from each boring. The cuttings will be tamped down with the end of a drilling rod (or similar) and any excess space in the borings filled with 3/8-inch chipped bentonite swelling clay. Each boring will be completed with a surface patch matching the surrounding material (grass).

6. DATA EVALUATION AND REPORTING

Laboratory results will be provided to WDNR within 10 days of receipt of the analytical data. Ramboll will also prepare a WAC NR 716 Site Investigation Report following completion of site investigative activities.

Note that Ramboll has been granted approval for conducting the sub-slab soil vapor sampling prior to submission of the SI WP in an email dated March 10, 2021 (**Appendix C**). The sub-slab soil vapor sampling has been completed (March 12, 2021) at the time of this writing. The remainder of the site investigation activities will be initiated upon scheduling the work with Trace-Mitchell Real Estate, LLC and the subcontractors. Ramboll will continue conducting the required response actions in a timely manner and communicate the findings of those actions to Trace-Mitchell Real Estate LLC and the WDNR as they occur.

7. REFERENCES

https://dnr.wi.gov/WellConstructionSearch/#!/PublicSearch/Index, March 12, 2021.

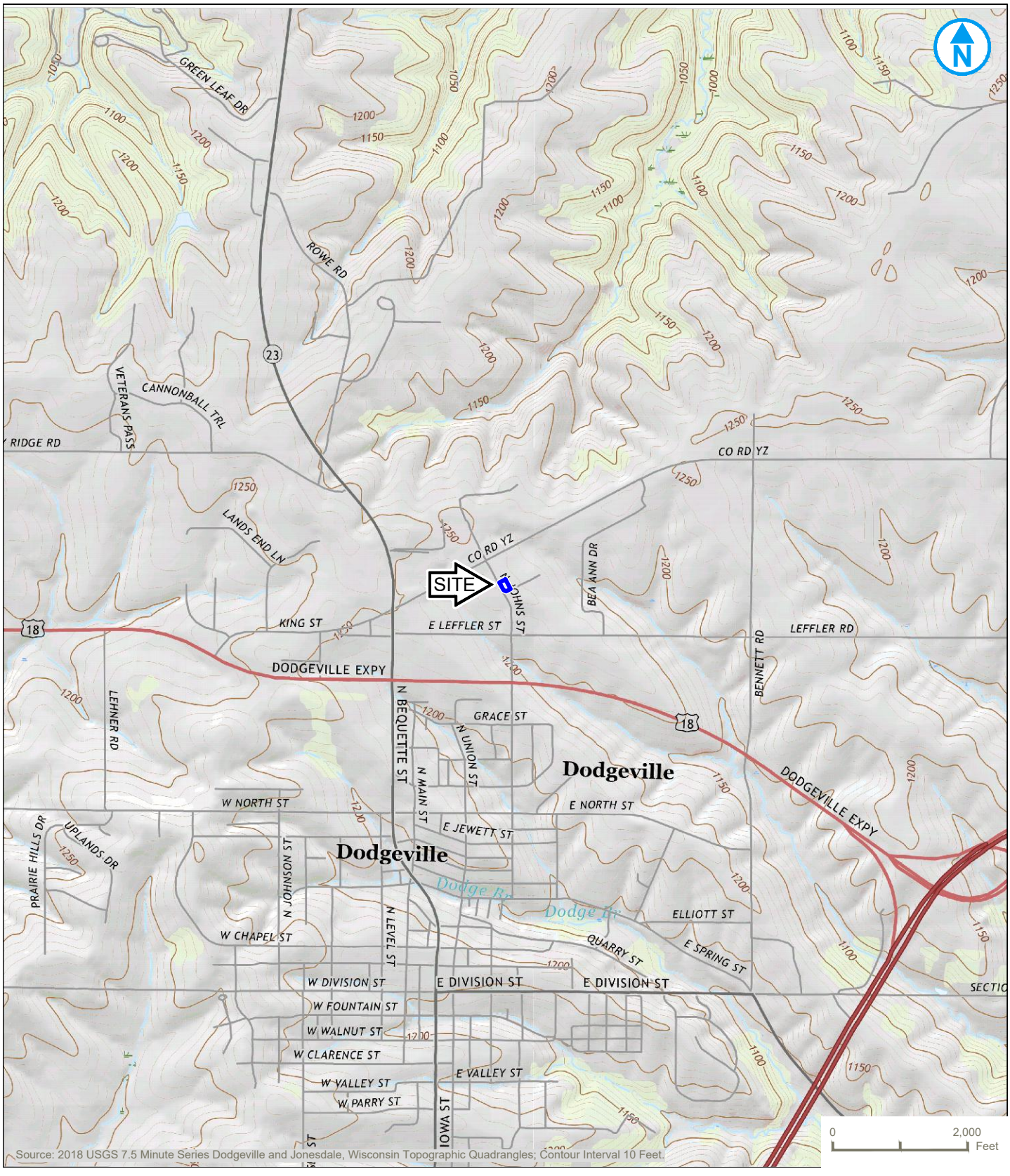
https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm, March 12, 2021.

AEI Consultants, Inc., Phase I Environmental Site Assessment, June 19, 2020.

Ramboll US Consulting, Inc. 2020. No Action Required Request
1305 North Johns Street Dodgeville, Wisconsin, November 13, 2020.

WDNR Site File Silicon Sensors, BRRTS No. 02-25-001456, https://dnr.wi.gov/botw/Search.do,
January 26, 1993.

FIGURES



C:\Users\hjward\Desktop\WIP\1690020998_MTRE_NAPA_PHII\01_Site Location Map (Dodgeville WI).dwg

PROJECT: 1690020998 DATED: 3/10/2021 DESIGNER: HJW

KEY MAP

Map Scale: 1:24,000
Map Center: 42°58'35.6664", -90°7'35.6664"

SITE LOCATION MAP

NAPA RETAIL STORE
1305 NORTH JOHNS STREET
DODGEVILLE, WISCONSIN 53533

FIGURE 1

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY

RAMBOLL

Source: Iowa County GIS 06/29/2020

Site Layout
Former Dry Cleaner
1305 N Johns Street
Dodgeville, WI 53533

RAMBOLL

FIGURE
2

DRAFTED BY: rpm

DATE: 02/18/2021

APPENDIX A

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
3911 Fish Hatchery Road
Fitchburg WI 53711-5397

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

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]

APPENDIX B

Unit Conversion Calculator

Amount	148
Units	ug/L
Molecular Weight	165.85
ppbv	21818.51
ug/L	148
mg/m^3	148
ppmv	21.82
ug/m^3	148000
%	0.0021819

Compounds

Pyrene
Quinoline
Safrole
sec-Butyl Mercaptan
sec-Butylbenzene
Styrene
Styrene Oxide
Sulfurhexafluoride
Terphenyl-d14
tert-amyl methyl ether
tert-Butyl Alcohol
tert-Butyl Mercaptan
tert-Butylbenzene
tert-Butyltoluene
Tetrachloroethene

Calculate Clear

STP assumes 24.45 = (25°C and 1 atm).

June 1991, W-8

Unit Conversion Calculator

Amount	48
Units	ug/L
Molecular Weight	165.85
ppbv	7076.27
ug/L	48
mg/m^3	48
ppmv	7.08
ug/m^3	48,000
%	0.0007076

Compounds

Pyrene
Quinoline
Safrole
sec-Butyl Mercaptan
sec-Butylbenzene
Styrene
Styrene Oxide
Sulfurhexafluoride
Terphenyl-d14
tert-amyl methyl ether
tert-Butyl Alcohol
tert-Butyl Mercaptan
tert-Butylbenzene
tert-Butyltoluene
Tetrachloroethene

Calculate Clear

STP assumes 24.45 = (25°C and 1 atm).

November 20, 1991, Dave Baker potable well (adjacent-west)

Unit Conversion Calculator

Amount	130
Units	ug/L
Molecular Weight	165.85
ppbv	19164.91
ug/L	130
mg/m^3	130
ppmv	19.16
ug/m^3	130000
%	0.0019165

Compounds

Pyrene
Quinoline
Safrole
sec-Butyl Mercaptan
sec-Butylbenzene
Styrene
Styrene Oxide
Sulfurhexafluoride
Terphenyl-d14
tert-amyl methyl ether
tert-Butyl Alcohol
tert-Butyl Mercaptan
tert-Butylbenzene
tert-Butyltoluene
Tetrachloroethene

Calculate Clear

STP assumes 24.45 = (25°C and 1 atm).

June 1993, W-8

Unit Conversion Calculator

Amount	83
Units	ug/L
Molecular Weight	165.85
ppbv	12236.06
ug/L	83
mg/m^3	83
ppmv	12.24
ug/m^3	83000
%	0.0012236

Compounds

Pyrene
Quinoline
Safrole
sec-Butyl Mercaptan
sec-Butylbenzene
Styrene
Styrene Oxide
Sulfurhexafluoride
Terphenyl-d14
tert-amyl methyl ether
tert-Butyl Alcohol
tert-Butyl Mercaptan
tert-Butylbenzene
tert-Butyltoluene
Tetrachloroethene

Calculate Clear

STP assumes 24.45 = (25°C and 1 atm).

June 1993, Dave Baker potable well (adjacent-west)

APPENDIX C

Richard Mazurkiewicz

From: Rice, Caroline M - DNR <caroline.rice@wisconsin.gov>
Sent: March 10, 2021 4:55 PM
To: Richard Mazurkiewicz
Cc: Jeanne Tarvin; Marla
Subject: RE: WDNR Notice of sub-slab soil vapor sampling at the NAPA store in Dodgeville, WI

Good afternoon Richard,

Thank you for sending over the sub-slab vapor sampling work plan. I agree with the described scope of work.

Please reach out if you would like to discuss further.

Best regards,
Caroline

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Caroline Rice
Phone number (608) 219-2182
caroline.rice@wisconsin.gov

From: Richard Mazurkiewicz <RMAZURKIEWICZ@ramboll.com>
Sent: Wednesday, March 10, 2021 4:28 PM
To: Rice, Caroline M - DNR <caroline.rice@wisconsin.gov>
Cc: Jeanne Tarvin <jtarvin@ramboll.com>; Marla <mommamitchell@charter.net>
Subject: WDNR Notice of sub-slab soil vapor sampling at the NAPA store in Dodgeville, WI

Good day to you Caroline,

As described in our conversation today, Ramboll US Consulting, Inc. (Ramboll) is currently preparing the site investigation work plan for the subject Site. However, Ramboll wants to complete the sub-slab soil vapor sampling portion of the work inside the NAPA store building this week Friday (03/12/2021) while the ground is still frozen. This is to compare the March 2021 tetrachloroethene (PCE) and ethylbenzene concentrations to the PCE and ethylbenzene concentrations that were collected last July 2020 (**Table 2**). Note that Ramboll will assess and document the frozen ground condition while on-Site. Ramboll will install and resample the six sub-slab soil vapor sample locations as depicted on the attached **Figure 2** (Site Layout). The following language will be included in the forthcoming site investigation work plan. Samples will be collected consistent with WDNR guidance.

A second round of sub-slab soil vapor sampling will be completed on March 12, 2021 to confirm the results documented in July 2020, i.e. to verify the concentrations of PCE and ethylbenzene are below the applicable small commercial building sub-slab vapor risk screening levels (VRSLs), as they were in July 2020. The second round of soil vapor sampling will be completed during winter[1] to monitor potential seasonal variances to address the detected PCE soil gas concentrations that are above the residential VRSLs but well below the applicable small commercial VRSLs. Ramboll will install six sub-slab Vapor Pins™[2] in the same locations as the July sub-slab soil vapor sampling event at the Site. The locations of the proposed sub-slab vapor sampling points will cover the entire building (with four probes) and also focus around the former dry cleaning machines that were formerly located near the northeast portion of the building (with two additional sub-slab vapor sampling points). Ramboll will leave the Vapor Pins™ installed should additional sampling be required. The soil vapor samples will be submitted to Pace Analytical Services, Inc., located in

Minneapolis, Minnesota (a Wisconsin-certified laboratory) for analysis of volatile organic compounds using United States Environmental Protection Agency (US EPA) Method TO-15.

[1] - Winter 2021 ends March 20.

[2] - Vapor Pin is a registered trademark used by Cox-Colvin & Associates located in Plain City, Ohio.

Please respond to this email if you concur with the scope described herein.

Thanks much,

Richard Mazurkiewicz

Managing Consultant

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M 414.517.8846
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