



December 10, 2021

Robert Jenior  
Jenior-Bagneski, LLC  
N85 W16345 Arthur Avenue  
Menomonee Falls, WI 53051  
*Via Electronic Mail Only* to robert.jenior@yahoo.com

Subject: Site Investigation Report Review  
Bay Cleaners, 201-207 South Main Street, Thiensville, Wisconsin  
BRRTS #: 02-46-587191; FID #: 246042170

Dear Mr. Jenior:

On October 12, 2021, the Department of Natural Resources (DNR) received the *NR 716 Site Investigation & Interim Action Report* (Report) for the Bay Cleaners site (Site). The Report was submitted by Moraine Environmental, Inc. (Moraine) on behalf of Jenior-Bagneski, LLC with a fee for DNR review and response. The submittal of a site investigation report is required per Wis. Admin. Code § NR 716.09, as this Site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09. The DNR has determined that additional actions and information are required to complete the site investigation.

### **Background**

The approximately 0.68-acre property was developed as a gas station in the 1950s. In the 1970s, an auto repair building with storefront was constructed. The gas station operations ceased in 1996 and the auto repair in the mid-2010s. A leaking underground storage tank (LUST) activity (BRRTS # 03-46-003888) is associated with the Site and was closed in 2006 with residual groundwater contamination. In the late 1990s Bay Cleaners began operating as a dry cleaner in the southeast corner of the onsite building. A Phase II Environmental Site Assessment (ESA) was conducted in 2019 that identified chlorinated volatile organic compounds (CVOCs) in the soil beneath and south of the onsite building where Bay Cleaners operated. The DNR was notified of the contamination on January 22, 2021, and a case was opened to address the contamination.

### **Summary of Report**

The Report provided an overview of the investigation completed at the Site to define the degree and extent of the CVOC contamination identified from the Phase II ESA. The investigation included the installation of soil probes and hand augers with one to two soil samples collected at each location for laboratory analysis of volatile organic compounds (VOCs). Groundwater monitoring wells were installed on and offsite. One to two rounds of groundwater samples were collected from each well and laboratory analyzed for VOCs. A vapor investigation was conducted to determine potential impacts beneath the building.

Laboratory analytical results identified soil contaminated with CVOCs in an area around the southern access door to the Bay Cleaners area of the building. Laboratory analytical results of the groundwater identified CVOCs above Wis. Admin. Code ch. NR 140 Enforcement Standards (ESs) or Preventive Action Limits (PALs). Results of the vapor investigation did not identify VOCs above Vapor Risk Screening Levels (VRSLs).

An excavation was conducted on the south side of the building to remove CVOC impacted soil. Confirmation soil samples were collected from the excavation cavity and additional groundwater monitoring wells were installed. Additional groundwater sampling was conducted after the excavation. Additional vapor samples were collected in the maintenance building and in the southeast corner of the Bay Cleaners building.

Results of the post excavation investigation identified residual CVOC-contaminated soil around the perimeter of the excavation. The latest round of groundwater sample results identified PALs or no detections for CVOCs. The second vapor sampling event detected VOCs but below VRSLs.

### **DNR Review**

The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716. The DNR has determined that additional actions and information are required to complete the site investigation.

### **Degree and Extent of Contamination in Affected Media**

Wis. Admin. Code § NR 716.11(3) requires the site investigation to determine the degree and extent, both horizontally and vertically of the hazardous substances or environmental pollution in all affected media.

#### 1. Soil

Contaminants of concern at the Site are CVOCs beneath and south of the building. An excavation was conducted to remove CVOC contaminated soil. Soil contaminated with CVOCs remains beyond the excavation. The DNR concurs that the soil investigation is complete.

#### 2. Groundwater

Groundwater is impacted with CVOCs above PALs. Additional groundwater samples are requested from all wells for VOC analysis to determine a trend and plume stability.

#### 3. Vapor

A vapor sample was collected at SS-1 in the Bay Cleaners area of the building in February 2020. Additional vapor samples were collected in August 2021 at SS-2 located near the southeast corner of the Bay Cleaners area of the building and at SS-3 and SS-4 in the maintenance shop. The DNR is requesting an additional round of vapor samples from these locations to verify the results.

#### 4. Offsite stormwater pond

The offsite stormwater pond located south of the Site is downgradient and potentially hydraulically connected to the groundwater in this area. The DNR is requesting information about the construction of the pond to determine whether conditions at/near the pond would allow the groundwater plume to migrate offsite.

#### 5. Migration Pathways

Identify floor drains and sumps in the building that could be a migration pathway for contaminants. Additional sampling may be needed based on the locations of floor drains and sumps in the building.

### **Next Steps**

In accordance with Wis. Admin. Code ch. NR 716 within 60 days of the receipt of this letter, submit a work plan with your plans to conduct the additional activities requested above. Once the activities are completed, submit a supplemental site investigation report in accordance with Wis. Admin. Code ch. NR 716 within 60 days of the completion of field activities.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, contact me at 414-639-4007 or [alice.egan@wisconsin.gov](mailto:alice.egan@wisconsin.gov).

Sincerely,



Alice Egan – Hydrogeologist  
Remediation and Redevelopment Program  
Southeast Region

cc: Dave Lennon – Moraine (via email)