



June 14, 2024

VIA EMAIL

Mr. Larry Bennett
LJB Investments, LLC
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W171 N4882 Greenview Avenue
Menomonee Falls, WI 53051

Subject: Review of Site Investigation Work Plan
Falls Cleanville (FMR), N88 W16761 Appleton Ave, Menomonee Falls, WI 53051
BRRTS # 02-68-593826, FID # 268708110

Dear Mr. Bennett,

The Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (SIWP) prepared for LJB Investments, LLC by Endpoint Solutions Corporation (Endpoint). The SIWP was submitted with a fee for DNR review and response. The DNR reviewed the SIWP for compliance with Wis. Admin Code ch. NR 716, as this site is subject to regulation under Wis. Stat. ch. 292.

Background

The subject property (Site) is a 0.1464-acre parcel located at N88 W16761 Appleton Avenue in Menomonee Falls, Wisconsin identified by the Waukesha County Tax Key Number MNFV0011233. The Site is currently occupied by a two-story building with multiple commercial tenant spaces on the first floor and residential apartments on the second floor. A basement and a sump are present. Land use adjacent to the Site is mixed commercial and residential.

Prior to 1941, the Site use appears to have been residential. Between 1941 and 1950, the current building was constructed. City directory information is available starting in 1969, and lists several businesses as operating at the site between 1969 and 2013. Notably, the 1969 and the 1973 directories list Falls Cleanville, a dry cleaner, as operating at the Site.

The site investigation activities completed to date have identified volatile organic compounds (VOCs) in soil, groundwater, and sub-slab vapor at the Site at concentrations exceeding their respective Wis. Admin. Code ch. NR 720 soil residual contaminant levels (RCLs), Wis. Admin. Code ch. NR 140 groundwater preventative action limits (PALs) and/or enforcement standards (ESs), and sub-slab vapor risk screening levels (VRSLs).

Summary of Proposed Work

The SIWP proposes advancing three soil borings and converting them to monitoring wells. Two soil samples, one from the direct contact interval and one from directly above the observed water table, will be collected from each boring and submitted to a laboratory for analysis of VOCs. It is proposed that the wells be developed and also sampled for VOCs.

It is expected that bedrock will be encountered between 10' and 15' below ground surface (bgs). The monitoring wells are proposed to be set at 20' bgs, which will necessitate coring through any bedrock that is encountered. The

wells are proposed to be constructed as 3/4-inch inner-diameter pre-packed wells. A variance from Wis. Admin. Code Chapter NR 141 well construction requirements is requested in the SIWP for the small-diameter wells.

The DNR understands that the wells will be constructed with 10' screens instead of 5' screens as stated in the SIWP.

Review of Site Investigation Work Plan

The DNR has reviewed the SIWP for compliance with Wis. Admin. Code ch. NR 716 and approves the plan with the following comments and recommendations:

1. Conceptual site model
 - a. Develop a conceptual site model (CSM) that identifies all potential source areas, contaminated media, migration pathways, and receptors.
 - i) The historical layout of the site building must be evaluated when determining potential source areas. Provide figures showing the current and historical site layout and features, such as the location of the former drycleaning machine, where dry cleaning solvents were transported, transferred, or stored, entrances to the building, floor drain locations, and other pertinent information.
 - ii) Provide a figure showing all utilities on the subject property, including pertinent historical utilities and utilities underneath the site building.
 - b. The CSM may identify additional areas that need to be investigated/sampled, including underneath the site building.
2. Monitoring well installation and sampling
 - a. The DNR approves the well construction variance request.
 - b. Drilling through bedrock typically uses more drilling water than drilling through unconsolidated material. When developing the groundwater wells, ensure that this additional volume of water is taken into account during purging activities so that drilling water is not sampled and interpreted as groundwater.
3. Vapor investigation and mitigation
 - a. Wis. Admin. Code § NR 708.11(1)(b) states that the DNR may require the use of a vapor mitigation system (VMS), or other engineering control, when vapor concentrations beneath a slab, foundation, or building exceed a VRSL. Vapor mitigation is necessary at the site building due to the presence of tetrachloroethene in sub-slab vapors at concentrations exceeding the applicable VRSLs. Install a VMS at the site building as soon as possible and conduct VMS commissioning activities such as indoor air sampling and pressure field extension testing to demonstrate that the VMS is effectively mitigating the vapor intrusion pathway. Guidance regarding vapor intrusion mitigation and VMS commissioning can be found in the DNR document *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin* (RR-800).

- i) The basement sump represents a potential vapor migration pathway that would not be mitigated by a VMS. Sample the sump liquid and headspace to determine whether the sump is acting as a migration pathway and, depending on the results, seal the sump to interrupt the pathway.
 - ii) Determine the configuration of the air intake for the forced air heating system. If the air is being drawn from inside the basement, the system may be influencing indoor air contaminant concentrations throughout the building.
- b. Due to the presence of tetrachloroethene in sub-slab vapors at concentrations exceeding the applicable VRSL, remedial action(s) to reduce the mass and concentration of volatile compounds to the extent practicable must be completed prior to case closure per Wis. Admin. Code § NR 726.05(8)(b)1.
 - c. Conduct a sanitary sewer investigation. Typically, this involves sampling sanitary sewer vapors from at least one manhole up-flow and two manholes down-flow from where the Site building's lateral connects to the mainline. The DNR recommends using passive samplers appropriate for use in sanitary sewers. See the DNR document *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors* (RR-649) for more information on conducting preferential pathway investigations.
 - d. Perform a vapor intrusion screening assessment to determine whether vapor sampling is warranted at off-site properties. Site specific information such as contaminant type, concentrations, preferential pathways, and distances from receptors should be considered in the screening assessment. Guidance regarding the performance of vapor intrusion screening assessments can be found in the DNR document *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin* (RR-800).

Emerging contaminants statement

Submit a revised emerging contaminants statement that lists the specific commercial activities that have taken place at the site and assesses their relationship with potential emerging contaminant sources.

Next Steps

The site investigation can be an iterative process, and data results may indicate further assessment is needed to define the degree and extent of contamination. As site investigation activities are conducted, sampling results must be submitted to the DNR within 10 days of receiving laboratory data. A site investigation report (SIR) should be submitted to the DNR within 60 days of completion of the field investigation and receipt of laboratory data. The DNR recommends submitting a fee with this report for a technical review and response.

Until requirements are met, the site will remain "open", and the submittal of semi-annual progress reports will be required per Wis. Admin. Code § NR 700.11.

This site has been renamed as "Falls Cleanville (FMR)" to identify the source of contamination for this BRRTS activity. The new name should be referenced on all future correspondence for this site.

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If you have any questions or would like to discuss the letter, please contact me, the DNR project manager, at (414) 704-4348 or by email at connor.mulcahy@wisconsin.gov.

Sincerely,



Connor Mulcahy
Hydrogeologist – Southeast Region
Remediation and Redevelopment Program

cc: Michele Norman, DNR – michele.norman@wisconsin.gov
Travis Manser, Endpoint – travis@endpointcorporation.com