



June 15, 2020

Mr. Qefli Neziri
Innovative Properties Group, LLC
628 N 8th Street
Manitowoc, WI 54220

Subject: Additional Information/Documentation and Actions Needed for One Hour Martinizing,
1233 South Military Avenue, Green Bay, Wisconsin
BRRTS # 02-05-217270

Dear Mr. Neziri:

On June 3, 2020, the Wisconsin Department of Natural Resources (DNR) received the May 20, 2020 indoor air sampling results submitted by your consultant, Paul Killian of GEI Consultants, on your behalf for the One Hour Martinizing site located at 1233 South Military Avenue in Green Bay, Wisconsin (“the Site”). The DNR performed a review of the indoor air results, along with a review of site investigation and interim action activities that have been performed thus far. The review revealed areas that need immediate attention:

Public Participation and Notification

Wis. Admin. Code § NR 714.07 requires responsible parties to conduct all necessary public participation and notification activities. Vapor sampling results shall be reported to occupants and DNR within 10 days of receiving results. Status of the occupancy of the businesses at the building is required to be provided to the DNR as chlorinated solvents / chlorinated volatile organic compound (CVOC) vapor concentrations remain at unacceptable concentrations within the building. Demographic information shall be submitted to the DNR, along with hours that each business is operating, and a listing of rooms and areas of the stores where employees have access. **Documentation of required data notifications, status of the occupancy and demographics should be submitted to the DNR by June 22, 2020.** The DNR has tools available to assist with these communications at <https://dnr.wi.gov/topic/Brownfields/Vapor.html> under the “Community Outreach” tab.

Interim Action Design and Documentation

Complete documentation of the mitigation design was not submitted per Wis. Admin. Code § NR 708.11(4)(b), ch. NR 712 and § NR 724.09 for the interim action. For example, there was no Professional Engineering certification, detailed description of the interim action proposal of a vapor mitigation system (VMS) & heating, ventilation and air conditioning (HVAC) adjustments, discussion of anticipated operation, maintenance or monitoring activities or time lines for installation or required documentation (e.g., construction report, operation, maintenance and monitoring plan, etc.). **Proper documentation of vapor mitigation construction including adjustments to plumbing and HVAC, and what actions have been taken thus far, should be submitted to the DNR by June 29, 2020.** Documentation should include proposed criteria for commissioning and verifying effectiveness of the actions and a time frame for submittal of an operation, maintenance and monitoring plan. Reference *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, RR-800*, available at dnr.wi.gov and search “RR-800”.

Immediate Action for Vapor Investigation

Additional investigation into the increased vapor concentrations in indoor air at the property, including investigation into the sanitary sewer vent, is necessary in accordance with Wis. Admin. Code chs. NR 708 and 716. Indoor air contaminant concentrations continue to be a concern for the DNR and the Department of Health

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Services (DHS) and the Brown County Health Department, as well as a concern for migration of vapors off-site to the north (1216 St. Agnes Drive, Green Bay) and through utilities. The property to the north at 1216 St. Agnes Drive is located less than 30 feet from the confirmed groundwater and vapor contamination and a concern for vapor intrusion.

Wis. Admin. Code § NR 716.11(5)(a) requires investigation of utility corridors along which vapors or contaminated water may flow. Disposal of wastewater containing CVOCs was a common historical practice at dry-cleaning operations. The vapor sampling performed by SCS Engineers in April 2020, found tetrachloroethylene vapors, a CVOC, in several plumbing vents, including a reading of over 10,000 parts per billion in the vent at 1219 (Jim's Music). This data is an indication that the sewer system is contaminated. SCS hypothesizes that this contamination may be also related to the sump pump discharges to the sanitary sewer. The concern is both migration of vapors back into your building and migration of contaminated effluent and vapors beyond the property and impacting surrounding properties. The mitigation system installed to date does not appear to address possible vapor intrusion via this route. The most important first step is obtaining accurate plans of the plumbing, sewerage, drain tile and other utilities on and leading away from your property. This may require supplemental investigation, such as video logging of lines.

A workplan to investigate the areas defined above both on and beyond the property should be submitted by June 29, 2020, which includes the following elements:

- Plan sheets showing the location (including depth if applicable) of all floor drains, plumbing features connected to the sewer system (sinks, toilets), sewer vent pipes, cleanouts, sumps, drain tile system external to the building, sump discharge points, sewer laterals on the property leading to the municipal sanitary sewer main, abandoned laterals on the property, locations of penetrations of the building foundation by sanitary sewer lines and other utilities, the municipal sewer main 500 feet in an up-flow and down-flow direction from where the lateral from your property joins it, laterals that serve other properties and manholes along that distance, and storm sewers on your property.
- A discussion of the construction (date, pipe material), repair, and cleaning or video-logging of any of sanitary sewer system pipes, if known. Some of this information may be available from the City of Green Bay.
- A proposal to sample the sewer system to assess whether chlorinated solvents are migrating in the vapor phase back into the building through preferential pathways or offsite through sewer conduits. This should include collection of vapor samples from cleanouts, vents, drains, and additional indoor air samples in rooms served by plumbing features.
- A plan and timing to perform a full column vapor investigation at 1216 St. Agnes Drive, Green Bay.

Workplan for Site Investigation

The steps taken at this Site since 2019 have been driven by the more time-sensitive concern for vapor intrusion into the occupied spaces of the building as well as concerns to finance the necessary work. As a result, progress at the Site has drifted substantially away from the typical iterative investigation to define the degree and extent of contamination in all affected media (soil, groundwater and air) as required in Wis. Admin. Code § NR 716.11(3). As you work to address the required actions discussed above, submittal of a workplan per Wis. Admin. Code § NR 716.09 is also necessary to bring this Site back into compliance. **The workplan for investigation into the soil and groundwater along with a timeline for implementation should be submitted by July 30, 2020.**

Be aware that during your investigation, you are required to comply with Wis. Admin. Code chs. NR 700-754 and all other applicable statutes and administrative rules, including those pertaining to solid and hazardous waste

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management and/or wastewater discharges. Wis. Admin. Code ch. NR 716 details specific requirements for site investigations and for interpretation and presentation of your findings.

The DNR appreciates your efforts to investigate and remediate this property. If you have any questions or concerns, please feel free to contact me at 920-366-5685 or via email at Josie.Schultz@Wisconsin.gov.

Sincerely,



Josie Schultz
Hydrogeologist
Remediation & Redevelopment Program

cc: Paul Killian, GEI Consultants (pkillian@geiconsultants.com)
Matthew Bookter, Bank First (mbookter@bankfirstwi.bank)
Don Gallo, Axley Brynelson, LLP (dgallo@axley.com)
Roxanne Chronert, DNR (Roxanne.Chronert@wisconsin.gov)
Curtis Hedman, DHS (Curtis.Hedman@dhs.wisconsin.gov)
Clara Jeong, DHS (Clara.Jeong@dhs.wisconsin.gov)
Deanne Van Kirk, Brown County Health Department (Deanne.VanKirk@browncountywi.gov)