

Gray, Jane K - DNR

From: Gray, Jane K - DNR
Sent: Friday, February 7, 2025 1:54 PM
To: graczyk.lisa@epa.gov; ramanauskas.peter@epa.gov
Cc: Carey, Angela J - DNR; Mylotta, Pamela A - DNR
Subject: Community Within the Corridor - East Block (BRRTS #02-41-263675) - PCB in Exceedance of EPA's MCL Notification
Attachments: 0241263675_20250107_PCB_Notice.pdf; PCB_GW_tables.pdf; GW_figure_PCBs.pdf; 20210406_13_Reopener.pdf

Good afternoon – I am the WI DNR Project Manager for the Community Within the Corridor East Block site, which is an open DNR environmental repair program site located at 2748 N 32nd Street, Milwaukee, WI. The purpose of this email is to inform you that PCBs have been identified in groundwater at the site in exceedance of the EPA's MCL value, as required under, *DNR and EPA's One Cleanup Program Memorandum of Agreement Between the United States Environmental Protection Agency Region 5 and the Wisconsin Department of Natural Resources* (DNR guidance document RR-064). As outlined in the attached figures and data tables, in the most recent groundwater monitoring event, PCBs were identified at 0.5 ppb at monitoring well location MW-2 and at 59 ppb at monitoring well location MW-4RR. Limited soil investigation of PCBs has been conducted at the site to-date, and has identified PCB detections below 1 ppm. Wis. Admin. Code ch. NR 716 site investigation is underway at this site and has not yet been approved by the DNR. For additional information related to this site and access to the site file, you may review the DNR's online database, BRRTS on the Web, at the link here: [02-41-263675 COMMUNITY WITHIN THE CORRIDOR \(CWC\) EAST](#). The Responsible Party letter, dated April 6, 2021, has been attached for your convenience.

The site has been undergoing redevelopment since approximately 2020 to be transformed from a former industrial use building into an affordable housing multi-family apartment building. The primary contaminants of concern identified during site investigation activities thus far are chlorinated solvents related to historical engine manufacturing operations. In March 2023, indoor air samples collected throughout the occupied site building identified vapor action level exceedances for trichloroethene. Since March 2023, the DNR has been closely working with the responsible party, their environmental consultant, the City of Milwaukee, and WI Department of Health Services to focus our attention to the human and environmental health concerns related to vapor intrusion at this site. Vapor assessment, remediation, and mitigation efforts have been implemented and the DNR now focuses our attention to the Wis. Admin. Code ch. NR 716 site investigation status, which is why we now bring the subject topic to your attention.

Given the site status within our regulatory framework and the site's recent history outlined above, the DNR would like to schedule a meeting with you to discuss next steps for managing the PCB contamination at this site once additional investigation has been performed. Please let us know if you would like to meet sooner.

Please do not hesitate to reach out with any immediate questions you might have.

Thank you, Jane

Jane Gray
she/her/hers
Hydrogeologist Program Coordinator – West Central Region
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Phone: (414) 435-8021
jane.gray@wisconsin.gov



dnr.wi.gov

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Notice #1 – DNR Notification to EPA Form for PCB Contamination per OCP MOA

For notification of EPA new discovered PCB sites entered onto BRRTS. EPA will also track these cases. DNR agrees to provide the following in electronic form:

	(to be completed by DNR)
BRRTS #	02-41-263675
Start Date	Activity re-opened on 04/06/2021. Original case opened on 01/11/2001 and closed on 08/26/2008.
Site Name	Community Within the Corridor (CWC) East
Site Address	2748 N 32 nd Street, Milwaukee, WI 53210
County	Milwaukee
DNR PM Name	Jane Gray
DNR PM Phone #	(414) 435-8021
DNR PM Email	Jane.Gray@wisconsin.gov
PCB Site MOA Type if known (A, B or C – see guidance)	Site Type to be determined; Investigation into the PCB source, date of discharge and degree and extent of contamination is ongoing.
Impact (Soil, GW, etc. if received)	Soil and GW

DNR will identify PCBs as being a substance type in BRRTS for these sites.

A copy of DNR's RP notification letter should be converted to a pdf file and accompany this form.

Upon completion of this form by DNR, please email this form and a pdf of the RP letter to the EPA Region 5 PCB coordinator with an email cc to the DNR RR Bureau PCB Contact.

Add BRRTS Action Code 99 with the date and comment stating "OCP PCB Notice #1, Notification of a PCB Contamination Site sent to EPA"

Upon receipt of the form by EPA, EPA will assign a Region 5 contact to the case and notify the DNR PM and the DNR RR Bureau PCB contact. The DNR PM should enter the name of the EPA contact into BRRTS for the site.

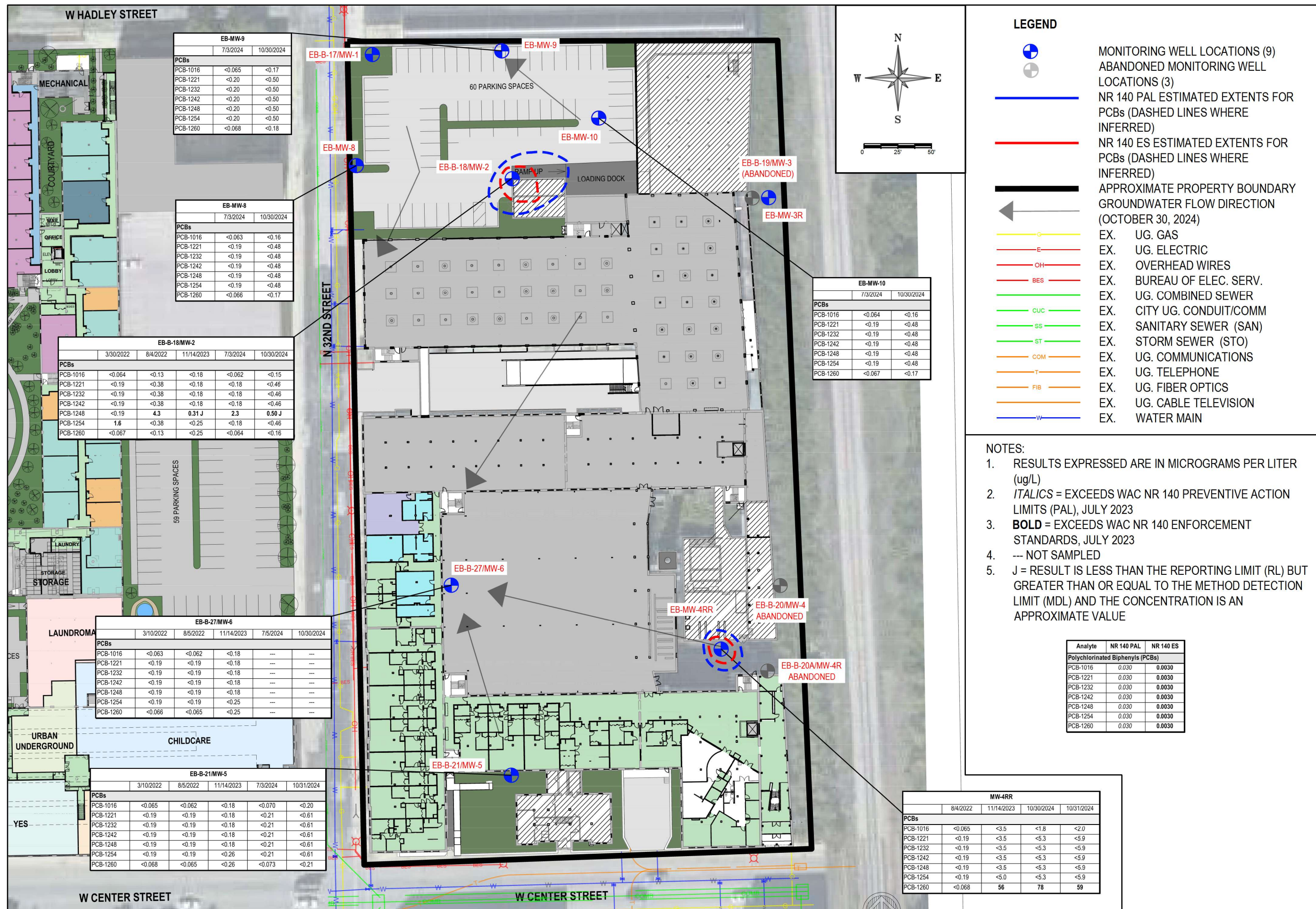


TABLE 5
GROUNDWATER QUALITY TEST RESULTS-PCBs
COMMUNITY WITHIN THE CORRIDOR - EAST BLOCK
MILWAUKEE, WI
PROJECT NUMBER: 40441

Sample	Units	EPA Method	NR 140 PAL	NR 140 ES	EB-B-18/MW-2 ¹						EB-MW-3	EB-B-20/MW-4	EB-B-20A/MW-4R			MW-4RR				
Date					6/30/2021	3/30/2022	8/4/2022	11/14/2023	7/3/2024	10/30/2024	11/29/2021	7/29/2021	12/14/2021	3/10/2022	3/30/2022	8/4-5/2022	11/14/2023	7/5/2024	10/30/2024	10/31/2024
Polychlorinated Biphenyls (PCBs)																				
PCB-1016	ug/L	8082A	0.03	0.003	---	<0.064	<0.13	<0.18	<0.062	<0.15	---	---	---	---	<0.065	<0.065	<3.5	---	<1.8	<2.0
PCB-1221	ug/L	8082A	0.03	0.003	---	<0.19	<0.38	<0.18	<0.18	<0.46	---	---	---	---	<0.19	<0.19	<3.5	---	<5.3	<5.9
PCB-1232	ug/L	8082A	0.03	0.003	---	<0.19	<0.38	<0.18	<0.18	<0.46	---	---	---	---	<0.19	<0.19	<3.5	---	<5.3	<5.9
PCB-1242	ug/L	8082A	0.03	0.003	---	<0.19	<0.38	<0.18	<0.18	<0.46	---	---	---	---	<0.19	<0.19	<3.5	---	<5.3	<5.9
PCB-1248	ug/L	8082A	0.03	0.003	---	<0.19	4.3	0.31 J	2.3	0.50 J	---	---	---	---	<0.19	<0.19	<3.5	---	<5.3	<5.9
PCB-1254	ug/L	8082A	0.03	0.003	---	1.6	<0.38	<0.25	<0.18	<0.46	---	---	---	---	<0.19	<0.19	<5.0	---	<5.3	<5.9
PCB-1260	ug/L	8082A	0.03	0.003	---	<0.067	<0.13	<0.25	<0.064	<0.16	---	---	---	---	<0.068	<0.068	56	---	78	59
Notes:																				
Italics = Exceeds Wisconsin Administrative Code (WAC) NR 140 Preventive Action Limits (PAL), July 2023																				
Bold = Exceeds WAC NR 140 Enforcement Standard (ES), July 2023																				
--- No Established Standard/Not Sampled																				
ug/L= Results expressed in micrograms per liter (ug/L)																				
J = Result is less than the reporting limit (RL) but greater than or equal to the method detection limit (MDL) and the concentration is an approximate value																				
1 - Incorrectly labeled in the 6/30/2021 analytical lab report as EB-B-17/MW-2																				

TABLE 5
GROUNDWATER QUALITY TEST RESULTS-PCBs
COMMUNITY WITHIN THE CORRIDOR - EAST BLOCK
MILWAUKEE, WI
PROJECT NUMBER: 40441

Sample	Units	EPA Method	NR 140 PAL	NR 140 ES	EB-B-21/MW-5							EB-B-27/MW-6							EB-MW-8		EB-MW-9		EB-MW-10		DUP-1
Date					6/30/2021	11/12/22021	3/10/2022	8/5/2022	11/14/2023	7/3/2024	10/31/2024	8/25/2021	11/12/2021	3/10/2022	8/5/2022	11/14/2023	7/5/2024	10/30/2024	7/3/2024	10/30/2024	7/3/2024	10/30/2024	7/3/2024	10/30/2024	7/3/2024
Polychlorinated Biphenyls (PCBs)																									
PCB-1016	ug/L	8082A	0.03	0.003	---	---	<0.065	<0.062	<0.18	<0.070	<0.20	---	---	<0.063	<0.062	<0.18	---	---	<0.063	<0.16	<0.065	<0.17	<0.064	<0.16	<0.062
PCB-1221	ug/L	8082A	0.03	0.003	---	---	<0.19	<0.19	<0.18	<0.21	<0.61	---	---	<0.19	<0.19	<0.18	---	---	<0.19	<0.48	<0.20	<0.50	<0.19	<0.48	<0.19
PCB-1232	ug/L	8082A	0.03	0.003	---	---	<0.19	<0.19	<0.18	<0.21	<0.61	---	---	<0.19	<0.19	<0.18	---	---	<0.19	<0.48	<0.20	<0.50	<0.19	<0.48	<0.19
PCB-1242	ug/L	8082A	0.03	0.003	---	---	<0.19	<0.19	<0.18	<0.21	<0.61	---	---	<0.19	<0.19	<0.18	---	---	<0.19	<0.48	<0.20	<0.50	<0.19	<0.48	<0.19
PCB-1248	ug/L	8082A	0.03	0.003	---	---	<0.19	<0.19	<0.18	<0.21	<0.61	---	---	<0.19	<0.19	<0.18	---	---	<0.19	<0.48	<0.20	<0.50	<0.19	<0.48	<0.19
PCB-1254	ug/L	8082A	0.03	0.003	---	---	<0.19	<0.19	<0.26	<0.21	<0.61	---	---	<0.19	<0.19	<0.25	---	---	<0.19	<0.48	<0.20	<0.50	<0.19	<0.48	<0.19
PCB-1260	ug/L	8082A	0.03	0.003	---	---	<0.068	<0.065	<0.26	<0.073	<0.21	---	---	<0.066	<0.065	<0.25	---	---	<0.066	<0.17	<0.068	<0.18	<0.067	<0.17	<0.065
Notes: Italics = Exceeds Wisconsin Administrative Code (WAC) NR 140 Preventive Action Limits Bold = Exceeds WAC NR 140 Enforcement Standard (ES), July 2023 --- No Established Standard/Not Sampled ug/L= Results expressed in micrograms per liter (ug/L) J = Result is less than the reporting limit (RL) but greater than or equal to the method dete 1 - Incorrectly labeled in the 6/30/2021 analytical lab report as EB-B-17/MW-2																									



April 6, 2021

Mr. Shane LaFave (via electronic mail)
Community Within the Corridor Limited Partnership
110 Cheshire Ln., Ste. 120
Minnetonka, MN 55305

Subject: Reopening of Closed Case at
Community Within the Corridor – East Block
(Former Wisconsin Industries Pension Plan & Trust)
2748 N. 32nd St., Milwaukee, WI
DNR BRRTS #02-41-263675, FID #241025400

Dear Mr. LaFave:

On August 3, 2020, the Wisconsin Department of Natural Resources (DNR) received a 'Request for Post Closure Modification' (PCM Request), submitted by K. Singh & Associates, Inc. (K Singh), on behalf of the Community Within the Corridor Limited Partnership, for the property described above. Additional sampling was conducted on the property and the results were included as part of the PCM Request. A sub-slab vapor sample detected Trichloroethylene (TCE), 1,1-Dichloroethane and 1,2,4-Trimethylbenzene at concentrations exceeding their respective vapor risk screening levels. A groundwater sample collected found Naphthalene at a significantly higher level than previously detected. A shallow soil sample collected in an area near the building not previously tested found Trichloroethylene, Benzene and Naphthalene above groundwater protection residual contaminant levels, indicating a potential additional area of vapor intrusion risk.

Community Within the Corridor Limited Partnership agreed to conduct a more extensive vapor intrusion investigation for TCE due to redeveloping the former industrial complex into residential multi-family housing. A sub-slab vapor investigation work plan was submitted and approved by the DNR. The results of the additional vapor investigation indicate chlorinated sub-slab vapors are widespread beneath the sub-slab of the building.

Additional soil investigation activities were conducted in February and March 2021. Results indicate numerous residual contaminant level exceedances on areas of the property that were previously uninvestigated. Prior investigations up until this point identified residual contamination from a previously identified chlorinated volatile organic compound (CVOC) release for which Wisconsin Industries Pension Plan & Trust was responsible and closed by the DNR on August 26, 2008. The DNR has determined that the newly discovered contamination poses a threat to public health, safety, welfare or the environment and meets the statutory requirements for reopening the previously closed site in accordance with Wis. Admin. Code § NR 727.13.

A response action in the form of additional soil, vapor and groundwater investigation, vapor mitigation and additional remediation is needed to address the contamination that was discovered during the recent site investigation activities. The additional site investigation, mitigation and remediation activities may occur concurrently with the proposed redevelopment construction activities provided the requirements outlined in Wis. Admin. Code chapters NR 700-754 and associated DNR technical guidance documents are followed.

The remainder of this letter describes your legal responsibilities under Wis. Stat. § 292.11 and explains what you need to do to investigate and clean up the contamination under Wis. Admin. Code chs. NR 700-754. It also provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with DNR.

As the owner of the property where residual contamination is found, Community Within the Corridor Limited Partnership is responsible for restoring the environment at the above-described site under Wis. Stat. § 292.11, known as the hazardous substance spills law.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substance spills law, Wis. Stat. § 292.11 (3) states:

- **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 754 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wis. Admin. Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

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).

General Recommendations for Responsible Parties:

The DNR recommends that you:

1. Hire a Qualified Environmental Consultant

You have indicated that K Singh will be serving as your environmental consultant. Please inform the DNR if any consulting changes are made.

2. Properly Submit Reports on Time with Required Information Included

Wisconsin law includes timeframes for submitting technical documents and conducting work, as well as specifications for what should be included in those submittals. This letter provides a general overview of the

timeframes and first steps to take for site investigation and cleanup. For an overview of timing requirements, please refer to *NR 700 Process and Timeline Overview* (RR-967), enclosed.

The DNR developed the publication *Guidance for Electronic Submittals for the Remediation and Redevelopment Program* (RR-690), to assist responsible parties and consultants in properly submitting documents. Wis. Admin. Code § NR 700.11 (3g), and other specific provisions within Wis. Admin. Code ch. NR 700, outline the requirements for submittals, including electronic submittals.

3. Consider the Benefits of a Fee-based Technical Review of your Submittals

In-depth DNR review of technical reports and submittals is available for a fee. The Remediation and Redevelopment (RR) Program project managers are available throughout the process to answer general questions and provide general input as the site moves toward case closure. However, if you want a formal, written response from the DNR, a meeting with the DNR or both on a specific submittal, a review fee will be required in accordance with Wis. Admin. Code ch. NR 749. **Obtaining technical assistance from DNR project managers throughout the process is an effective way to prevent problems and delays at the end of the process when case closure is requested.** Forms, a fee schedule and further information on technical assistance is available at dnr.wi.gov by searching “brownfield fees.”

Required Steps to Take and Documents to Submit:

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. The following information provides the timeframes and required steps to take. Unless otherwise approved by DNR in writing you must complete the work by the timeframes specified.

1. **Scoping and Work Plan Submittal – NR 716.07 and 716.09:** K Singh conducted additional soil investigation in February and March 2021 and are recommending that a site investigation work plan be prepared to delineate the extent of soil and groundwater contamination in accordance with the requirements of NR 716. The DNR has reviewed that information and will be providing comments in a separate pending letter. Have your consultant submit the work plan for completing the site investigation according to the pending review letter. The consultant must comply with the requirements in the NR 700 rule series and should refer to DNR technical guidance documents. To facilitate prompt agency review of your reports, your consultant should use the site investigation and closure formats which are available on-line at <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.
2. **Field Investigation – NR 716.11:** You must initiate the additional site investigation activities within 90 days of submitting the site investigation work plan. If a fee for DNR review has been submitted, the site investigation must begin within 60 days after receiving DNR comments.
3. **Sample Results Notification Requirements – NR 716.14:** You must report sampling results to the DNR, owners, occupants and various other parties within 10 business days after receiving the sampling results, unless a different timeframe is approved by the DNR, in accordance with Wis. Admin. Code § NR 716.14.

4. **Site Investigation Report – NR 716.15**: Within 60 days after completion of the field investigation and receipt of the laboratory data, you or your consultant must submit a site investigation report to the DNR.
5. **Remedial Actions Options Report – NR 722**: A Remedial Action Plan was submitted to the DNR on March 23, 2021. The DNR will be providing some feedback on this proposal in a separate pending letter. Within 60 days after submitting the Site Investigation Report, you must submit a remedial actions options report (RAOR).
6. **Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Reports – NR 724**: Unless otherwise directed by the DNR, the responsible party shall submit all plans and reports required by Wis. Admin. Code ch. NR 724.
7. **Notification of Residual Contamination or Continuing Obligations – NR 725**: In situations where notification is required, the responsible party must provide a submittal(s) that confirms that continuing obligations have been identified and affected property owners have been notified by the responsible parties 30 days prior to case closure, as required by Wis. Admin. Code ch. NR 725 and § NR 726.13 (1) (d).
8. **Semi-Annual Reporting – NR 700.11**: Wis. Admin. Code § NR 700.11 (1) (a) requires responsible parties to submit semi-annual site progress reports to the DNR until case closure is granted. The reports summarize the work completed over six months and additional work planned to adequately complete the response action at the site. Consultants may submit these reports on behalf of responsible parties. These reports are due in January and July of each year. Please refer to DNR publication *NR 700 Semi-Annual Site Progress Report* (RR-082), for more information.

Additional Information:

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System (BRRTS), a version of which appears on the DNR's Internet site (BRRTS on the Web). You may view the information related to your site at any time (<http://dnr.wi.gov/topic/Brownfields/wrrd.html>) and use the feedback system to alert us to any errors in the data.

If you want a formal response from the agency on a specific submittal, please be aware that a review fee is required in accordance with Wis. Admin. Code ch. NR 749. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation to maintain your compliance with the spills law and chapters NR 700 through NR 754. **The timeframes specified above are required by rule; do not delay the investigation of your site.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Attn: Environmental Program Associate
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Dr.
Milwaukee, WI 53212

Unless otherwise directed, submit one paper copy and one electronic copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers shown at the top of this letter. Electronic submittals required under the NR 700 rule series should be sent to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (<https://dnr.wi.gov/topic/Brownfields/Submittal.html>). Questions on using this portal can be directed to the contact below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (<https://dnr.wi.gov/topic/Brownfields/Contact.html>).

We encourage you to visit our website at <http://dnr.wi.gov/topic/Brownfields/>, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information about liability clarification letters, post-cleanup liability and more.

If you have questions, call the DNR Project Manager Jane Pfeiffer, at (414) 435-8021 for more information or visit the RR Web site at the address above. We will also be able to answer questions at our meeting this coming Friday.

Thank you for your cooperation.

Sincerely,



Pamela A. Mylotta
Team Supervisor, Southeast Region
Remediation & Redevelopment Program

cc: Mr. Que El-Amin, Scott Crawford, Inc.: que@scott-crawford.com
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