

September 13, 2002

Sigma Reference # 7582

Mr. John Hnat
Department of Natural Resources
Southeast Region Headquarters
2300 N. Dr. Martin Luther King Jr., Drive
P.O. Box 12436
Milwaukee, Wisconsin 53212-0436


Subject: Work Plan, Kaiser Property, Located at 4763 N. 32nd Street,
Milwaukee: BRRTS # 341055770; FID# 02-41-306192

Dear Mr. Hnat:

Sigma Environmental Services, Inc. (Sigma), on behalf of Ed Kaiser, co-trustee of the Kaiser Properties Trust, which currently owns the referenced property, respectfully submits this work plan. The work plan has been prepared in response to the Wisconsin Department of Natural Resource's (WDNR's) July 2, 2002 letter (prepared by Debby Roszak).

Sincerely,

SIGMA ENVIRONMENTAL SERVICES, INC.


Joshua J. Neudorfer, CHMM
Senior Project Mgr./Hydrogeologist


Randy E. Boness, P.G.
Geosciences Group Leader

Attachments

Cc: Mr. Ed Kaiser - Kaiser Properties Trust
Mr. Scott Fleming - Weiss, Berzowski
Ms. Debby Roszak - WDNR, Enforcement
Mr. Scott Ferguson - WDNR, Emergency Response Coordinator



**WORK PLAN
FOR THE KAISER PROPERTY
4763 N. 32ND STREET
MILWAUKEE, WISCONSIN**

BRRTS#: 341055770

Prepared For:
Mr. Ed Kaiser
Kaiser Properties Trust
3201 W. Hampton Avenue
Milwaukee, Wisconsin 53209

Prepared By:
Sigma Environmental Services, Inc.
220 East Ryan Road
Oak Creek, Wisconsin 53154

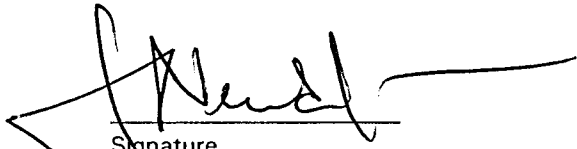
September 2002

Title and Approval Page

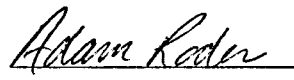
**Work Plan
Kaiser Property
Draft**

Prepared by: Sigma Environmental Services, Inc.
220 East Ryan Road
Oak Creek, Wisconsin 53154
(414) 768-7144
(414) 768-7158 - fax
jneudorfer@thesigmagroup.com - e-mail


Project Manager:
Joshua J. Neudorfer, CHMM


Signature
9/13/02
Name and Date

Asst. Project Manager:
Adam Roder, P.E.


Signature
9/13/02
Name and Date

Project QA Officer/Senior Geoscientist:
Randy E. Boness, P.G.


Signature
9-13-02
Name and Date

PROJECT DESCRIPTION

The Kaiser Properties Trust, c/o Ed Kaiser, co-trustee, has retained Sigma Environmental Services, Inc. (Sigma) as their consultant to complete a work plan to conduct environmental activities at the Kaiser property located at 4763 N. 32nd Street.

Based on a review of the existing data set, it is not apparent that an immediate or near term threat to human health or the environment exists which would necessitate an expeditious investigation, interim action, or remedial action. Instead, we recommend a phased approach to limit site access and evaluate real versus perceived conditions. Therefore, this work plan addresses those issues that will ensure public safety as it relates to the subject property and which are tangible concerns with immediately correctable outcomes. A comprehensive NR 716 investigation will be completed at such time as a redevelopment plan has been prepared for the site; for the time being, the current data appears sufficient to document site conditions, particularly because the known historical sources of potential impacts to the environment have been sampled, including the former chrome tanks, on-site storage tank, and storm sewer outlet, and because soil and groundwater at the down-gradient portion of the site have been extensively sampled.

The environmental site activities addressed in this work plan consist of the following:

- Extending the existing fence along the western property boundary to prohibit trespass on the site and restrict site access;
- Pursuing the current site user to properly dispose of drums containing oil, car repair, and paint wastes;
- Properly abandoning the water well located near the northeast corner of the property; WDNR WTR
- Conducting a VisuSewer evaluation of the sewer lateral that apparently originates on-site and terminates at Lincoln Creek and coordinating its bulkhead termination with the Milwaukee Metropolitan Sewage District; EPA Region 5
- Conducting a detailed site walk through and reevaluate potential sources as they relate to those impacts encountered during prior assessment activities;
- Evaluating WDNR files of adjacent property owners.

ΣSigma Environmental Services, Inc.

Work Plan

Kaiser Property

Final Version I:\weissbbd\7582\dnrwrkpln2.doc

Sigma estimates that the field activities for the specified site investigation activities will require approximately 12 weeks. Upon completion of the activities specified above, a report documenting the activities will be completed and submitted to the WDNR.

The work activities conducted pursuant to this Work Plan are intended to address the issues of concern identified by the WDNR in their letter dated July 2, 2002 (prepared by Debby Roszak).

BACKGROUND INFORMATION

Responsible Party. The Responsible Party and current site owner is the Kaiser Properties Trust, c/o Mr. Ed Kaiser, co-trustee. Mr. Kaiser's mailing address is 1460 Peregrine Point Drive, Sarasota, Florida 34231.

Site Location. The site is referred to as the Kaiser Property and is located at 4763 N. 32nd Street, in the City of Milwaukee, in Milwaukee County, at the NW1/4 of the NE1/4 of Section 1, Township 7 North, Range 21 East. Figure 1 attached illustrates the site location.

Consultant(s)/Reviewed Documents. Sigma Environmental Services, Inc. (Sigma) has been retained to assist in the development of this work plan and subsequent activities. Sigma's mailing address is 220 E. Ryan Road, Oak Creek, Wisconsin 53154.

Other environmental engineering and consulting firms have been involved in collecting data at the site; these firms include:

- Jay Jatkar, Inc., 1335 Hunter Circle, Naperville, Illinois 60540.
- HNTB Corporation, One Park Plaza, Suite 500, 11270 West Park Place, Milwaukee, Wisconsin 53224.
- Giles Engineering Associates, Inc., N8 W22350 Johnson Road, Suite A1, Waukesha, Wisconsin 53186.

The following documents prepared by the referenced consultants were reviewed in preparation of this work plan:

ΣSigma Environmental Services, Inc.
Work Plan
Kaiser Property
Final Version I:\weissbbd\7582\dnrwrkpln2.doc

- *Remedial Investigation Report* [located in HNTB's Phase 1 Report], prepared by Jay Jatkar, Inc.: September, 1998.
- *Phase 1 Environmental Site Assessment, Kaiser Property, 4763 N. 32nd Street, City of Milwaukee, Milwaukee County, Wisconsin*, HNTB Corporation: March 15, 2000.
- *Initial Phase II Environmental Site Assessment, Kaiser Property, 4763 N. 32nd Street, City of Milwaukee, Milwaukee County, Wisconsin*, HNTB Corporation: April 28, 2000.
- Letter dated June 27, 2002, Entitled *Summary of Preliminary Phase II Site Investigation, Lincoln Creek – Kaiser Property Area*, Prepared by Giles Engineering Associates, Inc.
- Letter dated July 5, 2002, Entitled *Work Plan for Exploratory Trenching, Lincoln Creek – Adjacent to Kaiser Property Area*, Prepared by Giles Engineering Associates, Inc.

Site Description. The site consists of approximately 20 buildings, many adjoined, occupying almost the entire five acres of the property. Figure 2 illustrates the buildings and site layout. The buildings range in age from approximately 45 to 75 years old and vary in height from one to five stories. Historically the property was occupied by the J. Greenebaum Tanning Company. Mr. Kaiser purchased the facility in 1956. The buildings were empty at the time of purchase. Since 1956, the buildings have been used for a variety of manufacturing and warehouse operations.

The property is bordered by a rail line to the west, Hampton Avenue to the north, 32nd Street to the east, and Lincoln Creek to the south. The Kaiser property is within the 32nd Street Industrial Corridor with industrial manufacturing operations located both south of the site and north of the site across Hampton Avenue.

CURRENT SITE OPERATIONS

The only current lessee occupying the site is a local religious organization which runs a small ministry from a northern portion of the building. A former employee of Kaiser Properties Trust uses the property for his automobile repair business and storage of automobiles, automobile parts, drummed automobile wastes, and other automobile-related materials. The remainder of the buildings are empty, unoccupied warehouse space and,

ΣSigma Environmental Services, Inc.

Work Plan

Kaiser Property

Final Version I:\weissbbd\7582\dnrwrkpln2.doc

based on a site walkthrough, are not believed to currently contain sources of material that require management in order to prevent a threat to the environment.

SUBSURFACE ENVIRONMENTAL CONDITIONS

Sigma completed a review of the available documents that discuss subsurface conditions at the site; the documents reviewed by Sigma are enumerated above. Based on our review, a few site locations appear to have soil impacts above Wisconsin Administrative Code, Chapter NR 720.09 Table 1 and/or Table 2 values. These locations include impacts above NR 720.09 soil values for lead (HNTB sample locations SB06 and SB12/MW01) and petroleum volatile organic compound (PVOC) impacts of ethylbenzene, toluene, and xylene in the vicinity of SB11/MW02. Figure ES-1 (prepared by HNTB) summarizes the soil and groundwater conditions encountered during Phase 2 assessment activities. Based on the nature of the impacts, it is possible that the source of the observed impacts is car repair operations conducted by the current user of the property. Additional soil characterization of the lead and PVOC impacts should be conducted in accordance with NR 716. However, based on the likelihood of redevelopment, and in order to phase the investigation activities and determine potential sources for the impacts, it is recommended that additional investigation activities be coordinated with redevelopment activities, and that because site access will be limited as part of this work plan, no immediate environmental risk exists that would necessitate immediate action.

Based on the extremely low groundwater recharge at the site and the fact that only one sampling event was completed at one well, Sigma is in doubt of the reliability of the groundwater data, which indicates elevated metal concentrations. In addition, it is possible that the samples were not filtered for suspended solids. It is quite likely that proper well development and sampling will demonstrate greatly reduced metals concentrations. In order to evaluate groundwater conditions, it would be appropriate to install NR 141 monitoring wells. However, this work should be coordinated with the phased approach and be completed only after a more thorough evaluation of the former site history and future use have been conducted.

In Fall 1998, Jay Jatkar, on behalf of the site owner, conducted sampling activities beneath the former chrome vats in the basement of Building 10. A copy of Mr. Jatkar's report is attached in the *Phase 1 Environmental Site Assessment Report* completed by HNTB, dated March 15, 2000. The results of those sampling activities indicate that chrome concentrations in soil samples collected from beneath the pits did not exceed NR 720.09 Table 2 values. Arsenic concentrations were found in excess of NR 720.09

ΣSigma Environmental Services, Inc.

Work Plan

Kaiser Property

Final Version I:\weissbbd\7582\dnrwrkpln2.doc

standards, ranging between 11 and 14 milligrams per kilograms; however, these concentrations exist beneath the vats in the basement and do not appear to represent a direct contact risk at this time. As such, a plan to address the arsenic impacts will appropriately be included in a site redevelopment plan.

In summer 2002, Giles Engineering Associates, Inc., on behalf of the Milwaukee Metropolitan Sewage District (MMSD) conducted relatively extensive soil sampling along the northern edge of Lincoln Creek and the southern property boundary. Many sampling parameters were analyzed, including volatile organic compounds (VOC), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenols (PCB), RCRA Metals, and Flash Point. The soil sampling was conducted at 11 sampling locations and samples were collected from multiple depths ranging from as shallow as 2 to 4 feet below ground surface (bgs) and extending as deep as 22 feet bgs. The only samples detected above WDNR standards were PAH compounds, almost exclusively the benzo(a)-series compounds. These compounds were detected above direct contact interim guidance standards but below the standards protective of groundwater. Additionally, the direct contact exceedances for the few PAH compounds were not detected in samples collected in the top four feet bgs, but rather from 4 feet bgs and deeper. Based on these findings, Sigma does not believe that immediate investigation activities are warranted.

Groundwater samples collected by Giles during their summer 2002 investigation activities were collected at temporary well points. Typically, temporary well points give erroneously elevated contaminant concentrations due to suspended solids inherent to this sampling process. The results of Giles water sampling program—water samples were collected at six locations—indicate that only chromium and naphthalene were detected above NR 140 enforcement standards. It is very possible that proper NR 141 well installation and sampling would result in lower concentrations, particularly for chromium. Based on the soil data collected to date, it does not appear that a source of chromium on the Kaiser property is causing on-going leaching to groundwater. Regardless, once a redevelopment plan has been prepared, it would be prudent to evaluate groundwater conditions utilizing properly installed NR 141 monitoring wells sampled in accordance with WDNR sampling protocol.

The MMSD, as part of their Lincoln Creek project, identified a sewer outfall apparently originating on the Kaiser Property and terminating at Lincoln Creek. As reported in the WDNR letter dated July 2, 2002, reddish liquid observed in Lincoln Creek was also observed in the basement of a Kaiser building. Since that time, the MMSD has connected

ΣSigma Environmental Services, Inc.

Work Plan

Kaiser Property

Final Version I:\weissbbd\7582\dnrwrkpln2.doc

the sewer lateral to a catchment basin and is pumping any liquid built-up in the catchment to the sanitary sewer, after proper sampling by Giles Engineering Associates, Inc. As of this time, Sigma has not reviewed the analytical data for any samples collected from the catchment basin, but presumes that the water has not contained sufficient contaminants to warrant action by the MMSD, as neither Mr. Kaiser nor his attorney have been notified of such.

In order to evaluate the sewer lateral and any potential for contaminant migration, Sigma recommends that VisuSewer film the sewer and provide a summary of findings, including the sewer construction and origination.

RECOMMENDED WORK ACTIVITIES

At this time, the health and welfare of local residents due to site accessibility and physical hazardous appears to be the most pressing issue. As such, Sigma recommends that the following activities occur to address these concerns:

- Extend the existing fence along the western property boundary to prohibit trespass on the site;
- Pursue the current site user to properly dispose of drums containing oil, car repair, and paint wastes;
- Properly abandon the water well located near the northeast corner of the property;

In addition, Sigma recommends a phased approach to additional investigation activities. At this time, we recommend the that following activities occur prior to implementation of a more aggressive soil and groundwater sampling strategy:

- Conduct a VisuSewer evaluation of a sewer lateral that originated on-site and terminated at Lincoln Creek;
- Conduct a detailed site walk through and reevaluate potential sources as they relate to those impacts encountered during prior assessment activities;
- Evaluate WDNR files of adjacent property owners.

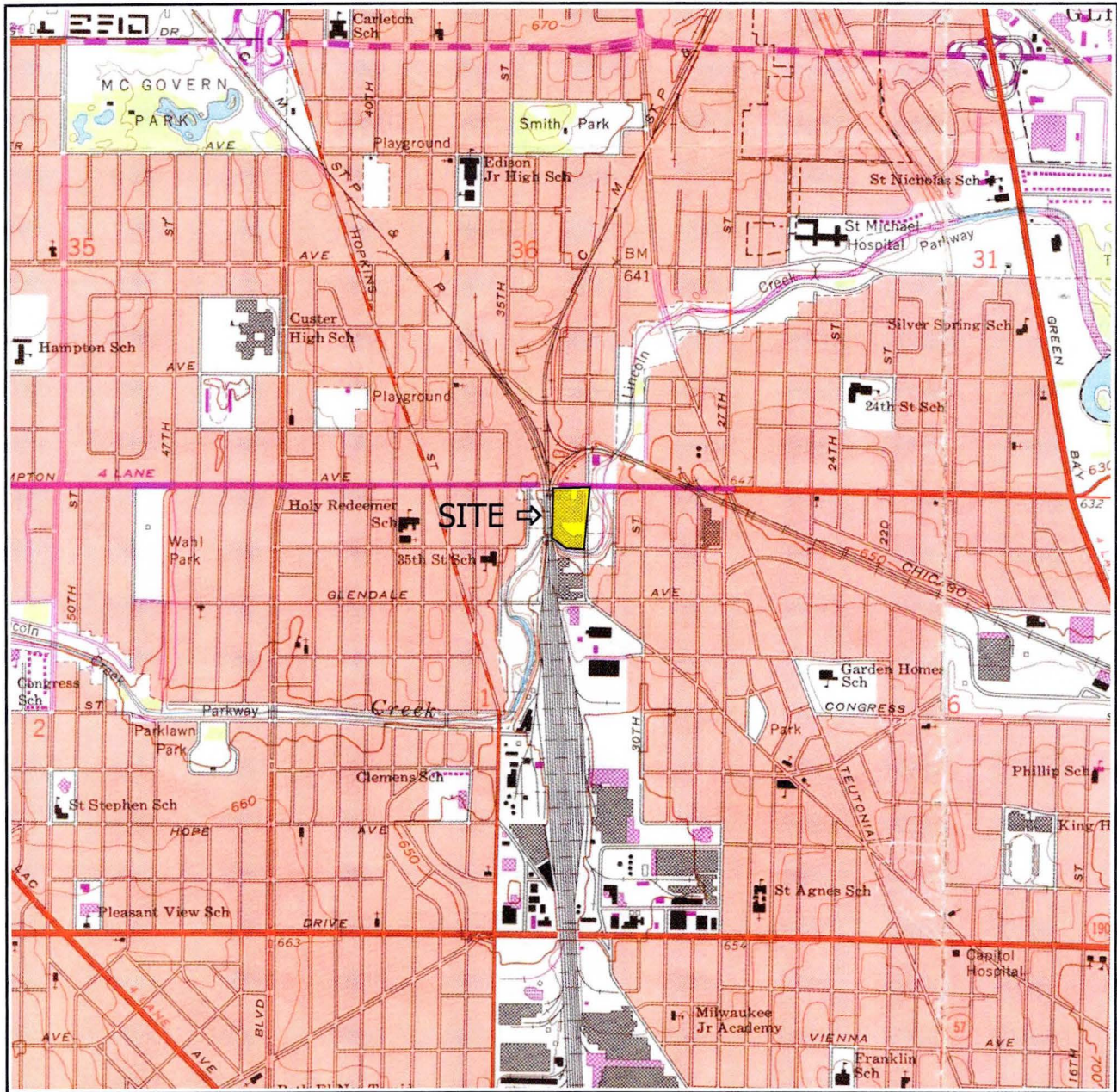
ΣSigma Environmental Services, Inc.

Work Plan

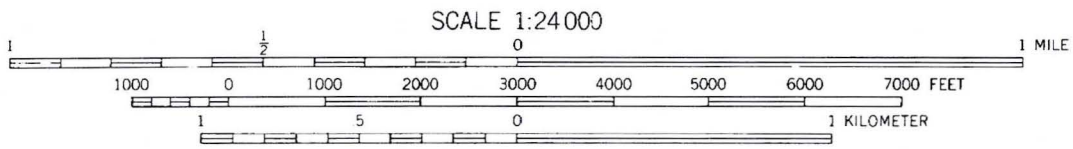
Kaiser Property

Final Version I:\weissbbd\7582\dnrwrkpln2.doc

These activities should address the primary concerns that pose direct health and safety risks to local residents. No tenants currently occupy any of the space to the south of the property where the primary environmental concerns appear to exist. Based on the sampling activities to date, it appears significant leaching to groundwater from on-site sources is limited or not currently existent. Therefore, we recommend that additional site investigation activities occur in a phased manner and to the extent feasible, in concurrence and coordinated with site redevelopment activities necessary to reestablish the property as a viable, tax generating entity.



NW ¼ of the NE ¼ of Sec. 1, T7N, R21E Adapted from U.S.G.S. 7.5 minute series, Milwaukee, Wisconsin, quadrangle dated 1958 (photorevised 1971).



CONTOUR INTERVAL 10 FEET
 DOTTED LINES REPRESENT 5-FOOT CONTOURS
 DATUM IS MEAN SEA LEVEL



Figure 1. Site Location Map
 Kaiser Property
 4763 N. 32nd St., Milwaukee, Wisconsin

