

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Matthew J. Frank, Secretary
Gloria L. McCutcheon, Regional Director

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August 14, 2008

Bishop Sedgwick Daniels
Holy Redeemer Institutional Church of God in Christ
3500 West Mother Daniels Way/West Stark Street
Milwaukee, WI 53209

Subject: Master Site Redevelopment Workplan & Soil Management Plan Report, Bishop's Creek Redevelopment Project, 4763 North 32nd Street, Milwaukee, WI

FID: 341055770
BRRTS: 02-41-306192

Dear Bishop Daniels:

At the request from George Marek, Quarles & Brady, on behalf of Bishop's Creek CDC, the Wisconsin Department of Natural Resources ("the Department") has reviewed the Draft Master Site Redevelopment Work Plan & Soil Management Plan ("Plans") for the site described above. In response to my e-mail to the Department of Commerce on July 25, 2008, and our meeting on August 12, 2008 with representatives from Drake Environmental, Common Bond, Quarles & Brady, and the City of Milwaukee (see below), the Department is responding to the "Plans" and meeting discussion to make the following recommendations to the "Plans". If any of the following discussion is incorrect or there is a need for more clarification, please contact me as soon as you can.

August 12, 2008 Meeting

The August 12th meeting consisted of the following individuals:

John J. Hnat – WDNR Project Manager/Senior Hydrogeologist
Mark Davis – WDNR Air Management/Asbestos
George Marek – Quarles & Brady for Bishop's Creek
Michael Simpson, Reinhart, Boerner, Van Deuren, for Common Bond
DJ Burns – Drake Environmental, Project Director
Chelsea Corson – Drake Environmental, Project Manager
Karen Dettmer – City of Milwaukee, Dept. of City Development, Senior Environmental Project Coordinator

The general discussion of the meeting is reflected in this response letter.

Redevelopment Work Plan

The Department has reviewed the Draft Master Site Redevelopment Work Plan from the position pertaining to the environmental issues located in the general areas of Buildings 10, 11, 12, 15, 17, 22 and portions of Buildings 3 and 16. These areas we discussed at our meeting of August 12, 2008 as follows:

Building #17 – Lot 2

- Building #17 may continue to have asbestos materials that would have to be removed before deconstruction. This should be coordinated with Mark Davis, WDNR. His telephone number is: 414-263-8674.

- The subbasement contains stagnant water that may or may not be contaminated. Drake Environmental stated they may have completed the water analysis for this issue. If not, then samples would have to be taken to find out if the stagnant water is contaminated or not. This water analysis would be required before transport to an offsite facility, or a permit issued from MMSD for discharge to a sanitary sewer.
- The gratings (unknown number) in the subbasement maybe blocked which may have caused the stagnant water conditions in the subbasement. These will be evaluated on exposure after dewatering. The building itself will be totally razed including the subbasement, therefore, the significance of these gratings and if they are connected to any other piping will be investigated on exposure.
- The tank found in the subbasement is believed to be associated with the high capacity well. This will be verified during deconstruction.
- The high capacity well is believed to be located in Building #17. As we discussed, the well will have to be video taped for well integrity and sampled for metals, PAHs, and VOCs before abandonment. Sharon Schaver, WDNR Drinking Groundwater, will have to be contacted prior to well abandonment to find out the Department's requirements for abandonment. She can be reached at 414-263-8560. She will also need to know when the abandonment is scheduled. She requires at a minimum 72 hours, or 3-working days before work commences.
- The LUST tank in the area will be assessed during redevelopment.
- Other petroleum areas are to be addressed by hot-spot removal or by monitored natural attenuation
- It was discussed at the meeting that Dave Hart, Wisconsin Geological and Historical Survey (608-262-2307) is highly interested in electric logging this well before abandonment. Electric logging of this well records the exposed formation in the uncased part of the well obtained by lowering and raising an electrode-device on a wire line and making insitu measurements of the electrical properties of the geologic formation. The log consists of a series of continuous traces of the formation indicating changes in composition, making local correlations, and indicating the nature and amount of fluids in the pores of the rock it encounters. This would be a great opportunity to gather information on a major drinking groundwater aquifer for the Survey. Please consider this request. Mr. Hart is able to give you all the details before a decision is made.

"Courtyard Area" and Buildings #3 and 16 – Lot 2

- A LUST site has already been closed by the Department.
- The areas identified as SSB-3 and near SB-11/MW-2 locations (proposed playground area) will be addressed during redevelopment.
- Hot spot areas will be addressed during redevelopment.

Buildings #10, 11, 12, 15, and 22 – Lot 1

- The full extent of chromium in soil and groundwater from the former tanning vat area will be evaluated during redevelopment.
- The outfall encountered during construction of MMSD's flood project caused a petroleum discharge from the site into Lincoln Creek. Deconstruction of these buildings may expose where this outfall originates and the cause of the discharge. Although MMSD installed a sump to collect any future discharges from this outfall to the sanitary sewer as a temporary solution, the source of the discharge has never been fully investigated and remediated.

Lot 1

The Department understands that a lease liability clarification letter for Lot 1 will be used as a parking lot for the Common Bond project. This is forth coming from Drake Environmental. Using the parking lot as a cap for direct contact and groundwater issues in the designated area is a sound solution for direct contact and/or petroleum issues in both environments. A full understanding what residual soil contamination at depth and extent after remediation will need to be completed before closure is granted.

Lot 2

Drake Environmental is revising a work plan that will address the Departments concerns as listed above.

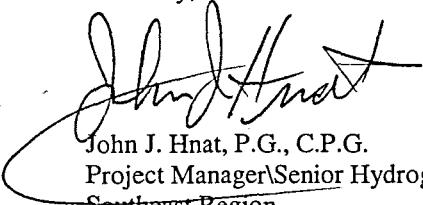
Soil Management Plan/Contingency Plan

The Department uses Chapter NR 718, Wis. Adm. Code, as the basis for management of solid wastes as minimum standards for the storage, transportation, treatment, and disposal of contaminated soil and other solid wastes excavated during site remediation. There are certain time limits for storage and notification requirements that must be adhered to for the protection of human health and the environment. Therefore, the "Plan" should be revised considering the following:

- A statement in the "Plan" that Chapter NR 718, Wis. Adm. Code, will be implemented during redevelopment.
- The site was an industrial tannery that is now classified by the Map Milwaukee site as a "PD" or "Planned Development". Future use of the property is anticipated to be residential. The proposed "Plan" states, "that the potential use of onsite contaminated soil management practices to be incorporated into the project wherever possible; the use of field observation and measurement to aid in the proper categorization of soil requiring management." If contaminated soils are to be used onsite, then what are the concentration values of the contaminated soils that will remain onsite and at what concentration levels will the soils be transported offsite? If soils are to be categorized, then what are they going to be categorized as and based on what?
- The "Plan" should include a procedure on notifying the Department on any "new" discharges found during redevelopment. There are a number of recognized environmental concerns for the site, but any new discharges will have to be reported to the Department in order for the Department to designate another BRRTS activity number for the problem
- The contingency plan should include a discussion on what the procedures are going to be if drums or USTs are encountered during redevelopment. This may require notification. This would include soil excavation, soil and/or groundwater sampling, and confirmation sampling. Generally, a Section NR 708, Wis. Adm. Code, closure may be obtained for simple response actions.

The Department may require additional investigation and remediation activities depending on the ongoing redevelopment of the site. The Department appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at the above address or at (414) 263-8644. Please refer to the FID number at the top of this letter in any future correspondence. Future correspondence should be sent directly to the Remediation and Redevelopment Program Assistant Vicky Stovall (414-263-8688) at the above address.

Sincerely,



John J. Hnat, P.G., C.P.G.
Project Manager/Senior Hydrogeologist
Southeast Region
Remediation and Redevelopment

C: Sharon Schaver – WDNR Drinking Groundwater
Mark Davis – WDNR Air Management/Asbestos
George Marek – Quarles & Brady for Bishop's Creek
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