## State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 2300 N. Dr. Martin Luther King, Jr. Drive Milwaukee WI 53212-3128

Tony Evers, Governor Preston D. Cole, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



December 19, 2019

Christopher Clark Pharmacia LLC 235 East 42<sup>nd</sup> Street, 219/5/1 New York, NY 10017

> Subject: Site Investigation Work Plan Milwaukee Die Casting Company 4132 North Holton Street, Milwaukee, Wisconsin 53212 BRRTS #02-41-000023, FID #241228240

Dear Mr. Clark:

On December 19, 2018, the Wisconsin Department of Natural Resources (Department) received a site investigation work plan (SIWP), dated December 14, 2018, prepared by Geosyntec Consultants to complete the investigation of environmental contamination at the Milwaukee Die Casting Company (MDCC) site (Site). The SIWP was submitted with a fee for Department review and response. The submittal of an SIWP is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The Department reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Following the submittal of the initial SIWP, correspondence between the Department and Geosyntec occurred on several occasions related to the proposed work:

- February 13, 2019 (email) the Department provided comments and requested additional information.
- April 2, 2019 (letter) Geosyntec responded to the Department's comments and information request.
- June 28, 2019 (email) the Department responded to Geosyntec's letter.
- August 22, 2019 (letter) Geosyntec responded to the Department's comments and notified the Department that they would proceed with the requested underground utility survey, followed by submittal of a revised SIWP.
- November 18, 2019 the Department received the revised SIWP, dated November 12, 2019.

To delineate the environmental impacts, proceed with implementing the revised SIWP with incorporation of the following comments:

1. Since MW-8 will be installed where originally proposed, an additional monitoring well(s) will be necessary to evaluate possible contaminated groundwater migration southward along the city sanitary and

storm sewer (north-south) trenches near the southeast corner of the MDCC property (see first bullet in the Department's Feb. 13, 2019 email).

2. Proposed soil-gas (SG) probes SG-5, SG-6, and SG-7 are positioned near sanitary and/or storm sewer laterals that formerly exited the MDCC property, but were removed (May 2015, July 2015, and September 2013, respectively) before the trenches were excavated and backfilled with fine-grained (silt, clay) materials. Therefore, the probes should be moved to intersect the city sanitary and storm sewer (north-south) trenches to the east of the MDCC property. The probe results may provide a secondary line of evidence regarding contaminated groundwater migration along the trenches.

The revised SIWP and this letter do not address the contaminated Milwaukee River sediments referenced in the Department's August 10, 2018 letter.

The site investigation can be an iterative process. Additional sampling may indicate that further assessment is needed to define the degree and extent of contamination.

## Schedule

The Department is requesting the implementation of the following schedule:

- Site investigation activities must begin 60 days after receiving the Department's approval of the SIWP per Wis. Admin. Code § NR 716.11(2r).
- Sampling results must be reported to the Department within 10 days of receiving the data per Wis. Admin. Code § 716.14(2).
- A site investigation report should be submitted within 60 days after completion of the site investigation per Wis. Admin. Code § NR 716.15(1).

We appreciate your efforts to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me at (414) 263-8631, or by email at <u>StephenD.Mueller@Wisconsin.gov</u>.

Sincerely,

Ante

Stephen D. Mueller Hydrogeologist Remediation and Redevelopment Program

Mr. Greg Johnson, Geosyntec Consultants, 10600 N. Port Washington Rd., Ste. 100, Mequon WI 53092
Ms. Mary Jo Anzia, BSI, 216 North Green Bay Rd., Thiensville, WI 53092
Mr. Matthew Reimer, Redevelopment Authority of the City of Milwaukee, 809 Broadway, Milwaukee, WI 53202