



We Energies
231 W. Michigan St.
Milwaukee, WI 53203
www.we-energies.com

May 8, 2019

Mr. John Feeney
Hydrogeologist
Wisconsin Department of Natural Resources
1155 Pilgrim Road
Plymouth, WI 53073-4294

RE: NR 716 Site Investigation Work Plan

Former We Energies 3rd Ward MGP Site
Milwaukee, Wisconsin 53202

BRRTS Activity #02-41-000320 (Peters=Johnson 3rd Ward Coal Gas MGP);
02-41-557054 (3rd Ward Coal Gas MGP/City of Milwaukee);
02-41-557057 (Hoffmann);
02-41-577202 (One Catalano Square)

Dear Mr. Feeney:

Enclosed please find the above referenced document. Also note that an electronic copy of this document has been provided to you at the Web Access Management System document upload portal.

Please feel free to contact me at your convenience at (414) 221-2156 or via email at frank.dombrowski@wecenergygroup.com if there are any questions or if further information may be needed.

Sincerely,

A handwritten signature in black ink that reads "Frank Dombrowski".

Frank Dombrowski
Principal Environmental Consultant
WEC Energy Group – Business Services
Environmental Dept.

Enclosures

CC: Project File
Julie Zimdars, OBG
Graham Fazio, OBG

May 8, 2019

Mr. John Feeney

Hydrogeologist
Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr Dr.
Milwaukee, WI 53212

RE: NR 716 Site Investigation Work Plan
Former Third Ward MGP Site
Milwaukee, Wisconsin
BRRTS #02-41-000320 (Peters=Johnson 3rd Ward Coal Gas MGP);
02-41-557054 (3rd Ward Coal Gas MGP/City of Milwaukee);
02-41-557057 (Hoffmann);
02-41-577202 (One Catalano Square)

Dear Mr. Feeney:

O'Brien and Gere Engineers Inc., part of Ramboll (OBG) has prepared this NR 716 Site Investigation (SI) Work Plan on behalf of We Energies to propose additional site investigation to be implemented at the former Third Ward Manufactured Gas Plant (MGP) (Site) located in Milwaukee, Wisconsin. The proposed site investigation activities are intended to address the WDNR's findings and interpretations regarding an incomplete site investigation as stated in the November 15, 2018 letter that was prepared in response to OBG's "Response to Case Closure Denial Comments – Sitewide Groundwater Conditions Update Report," latest revision dated September 5, 2018.

OBG has summarized the WDNR comments and provided responses to the November 15, 2018 letter in the first section of this document. The second section provides the SI Work Plan technical approach including details on the SI activities planned.

RESPONSES TO NOVEMBER 15, 2018 LETTER

During a meeting on April 1, 2019, WDNR provided technical assistance (with fee) to We Energies regarding the issues raised in the November 15, 2018 letter. Minutes of the meeting are provided in Attachment 1. The responses below reflect the guidance and discussions from the meeting:

1. Evaluation of environmental media affected or potentially affected by the contamination per NR 716.07(4)

1a. Determine how the MGP residuals entered the river and evaluate if river sediments continue to be impacted by an ongoing discharge of MGP residuals from the Site

Response: OBG has prepared conceptual site models (CSMs) for both the historic/plant operation timeframe (Figure 1) and the present day timeframe (Figure 2). These CSMs are attached for WDNR's review and comment. Main points from these CSMs are:

Historic/Plant Operation: Three potential migration pathways are described (A, B, and C). A vertical pathway through the soil matrix of the dense non-aqueous phase liquid (DNAPL) is shown as A. Pathway B illustrates the potential for flow of NAPL through the sewers (which were present prior to 1916 and during operation of the plant) into the river via historic 30" diameter outfalls at both Jefferson/Polk St. (near the former railroad bridge) and Young St./Broadway St. near the Young St. bridge (these outfalls are also coincident with thicker NAPL observations found in recent sediment investigation activities). This pathway likely included other smaller outfalls which existed within the property along the river. The applicable MMSD sewer maps and details for this 1916 sewer construction are provided in Attachment 2. Pathway C is a possible secondary horizontal pathway of



DNAPL through interbedded sand lenses. Review of boring logs for two geotechnical borings performed before the DoMus building construction did not indicate the presence of NAPL in sand or sand lenses above the clay layer, supporting the likely dominant Pathway B through the sewers.

Present Day Operation: The three potential migration pathways (A, B and C) are shown as eliminated for various reasons including the remediation and redevelopment of the main source area on the property, installation of infiltration caps, the stable and non-mobile properties of the NAPL, the elimination of the historic sewer discharge of MGP residuals, and recent installation vertical barriers (sheet pile walls) near the river.

2. Potential or known impacts to receptors per NR 716.07(7)

2a. Evaluate the potential for the vapor intrusion pathway to be complete at additional properties based on current groundwater sampling data. Refer to the DNR guidance document, RR-800. (A vapor sampling plan is pending review with the DNR for the Hoffmann property.) These properties include, but are not limited to:

- i. Patsy & Paul, and possibly Babcock Auto Springs depending on redevelopment plans***
- ii. One Warehouse Building***
- iii. The mixed use building southeast of MIAD (100 N. Broadway and 311 E. Erie St.)***
- iv. Glorioso's Warehouse***

Response: Vapor intrusion (VI) screening was performed for the Patsy & Paul building as part of the Peters=Johnson parcel vapor investigation (i.e., two vapor probes were performed along the east side of the building in the N. Milwaukee St. right-of-way) and VI screening was performed for the One Warehouse and Glorioso's Warehouse as part of the City of Milwaukee parcel vapor investigation (i.e., three vapor probes were performed along the north sides of those buildings in the E. Corcoran Ave. right-of-way). These prior VI screening locations are shown on Figure 3. The results of these assessments indicated that VI was not a complete secondary exposure pathway at these properties. WDNR approved the VI pathway assessment for these investigations on June 27, 2017 and April 4, 2017, respectively. As such, no additional vapor screening is planned for these buildings. The potential for VI impacts at the Babcock building will be addressed in conjunction with the planned redevelopment of this property as noted in the WDNR-approved Remedial Action Options Report (RAOR) for this parcel (letter dated September 5, 2017).

For the Marine Terminal building (100 N. Broadway and 311 E. Erie St.), a Geoprobe™ boring (advanced prior to the well installations) labeled SB-W-103 is planned in the location adjacent to the building in the Erie Street right-of-way (as shown on Figure 3). This boring will be used to not only assess shallow soil quality for vapor intrusion concerns, but also to assess if deeper NAPL impacted zones exist that need casing-off during the deeper well installation. Shallow soil assessment will be through PID reading and visual/olfactory observations. Additionally, a water table well screened in the Upper Shallow unit will be installed and sampled for VOCs in this location. This location, in addition to existing well W-101S and boring B-44D along and within Erie Street will be used to determine if vapor screening is necessary. WDNR agreed that if shallow conditions do not indicate a vapor concern, OBG should include this reasoning for the pathway not being complete per WDNR guidance (in accordance with RR-800 *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin*). If vapor screening is determined to be necessary based on shallow soil and/or groundwater impacts, up to 3 vapor probes may be installed in the approximate locations adjacent to the Marine Terminal building shown on Figure 3. The assessment will be performed consistent with previous WDNR-approved VI screening efforts at the Third Ward Site.

2b. Investigate the possible migration of LNAPL in utilities (including the deep tunnel) along E. Corcoran Street, near the City of Milwaukee property.

Response: Well W-20S contains LNAPL at a thickness of approximately 0.75 feet. The LNAPL depth zone is approximately 7 to 8 feet bgs. OBG understands WDNR's concern to be the possible migration in the backfill of the sewer(s) in the W-20S vicinity. OBG has requested the sewer maps in Corcoran Ave. from the City of Milwaukee to determine exact location, depth and size of the sewers. The current information indicates that the sewers in Corcoran Ave. near W-20S are older City sewers and not Near Surface Collector sewers that were installed more recently as part of the deep tunnel construction. Therefore, a migration pathway to the deep tunnel does not appear to exist. Also, OBG reviewed the W-20S log (provided in Attachment 3) and depth of LNAPL at the well. The LNAPL zone is within fill material described as silty sand, coarse, some gravel, little ash, dark brown, wet, moderate tar-like odor, sheen. Based on this description, the unit would likely be a similar permeability to the backfill of a sewer trench in the right-of-way, and therefore preferential migration pathways within the sewers/utilities backfill would not exist in this area. The densely compacted nature of the trench backfill in a street location, older construction and potential use of excavated trench spoils as backfill would also support that a migration pathway would not exist. OBG intends to review the sewer maps from the City and provide rationale for lack of preferential migration occurring in lieu of additional investigation.

3. Degree and Extent of contamination in all affected media per NR 716.11(3)(a)

3a. Determine the extent of groundwater contamination between well nests W-22I, W-22S, and the river in all three units (Upper Shallow, Lower Shallow, and the Clay zones). The DNR recommends placing wells on the west side of the utilities to determine if the utilities are acting as a cut-off, as proposed by OBG.

And

3b. Similarly, define the extent of groundwater contamination in the three units between the Site and the river, at or near the location of borings B-33D1 and B-33D2. Again, the DNR recommends wells on the west side of the utilities to determine if the utilities are acting as a cut-off, as proposed by OBG.

Response: OBG intends to install Geoprobe™ “pilot” borings (SB-W-103 and SB-W-104) in the locations shown on Figure 4, where WDNR suggests installation of wells in all three units. The Geoprobe™ boring will assess if deeper NAPL impacted zones exist that need casing-off during the deeper well installation. The wells are intended to be installed on the west side of the large sewer trench along the center line of Erie St. as shown on the figure. If free-phase NAPL is observed in the soil matrix in sufficient quantity, OBG will be prepared to install a 1-inch temporary well to monitor NAPL accumulation. OBG proposes to install 2 monitoring wells at each location: a 10-foot screened well in the Upper Shallow unit and 5-foot screened piezometer in the Lower Shallow unit (label “DL” for deep Lower) located in the sand/silty sand layer likely on top of the upper clay layer (approximately 30-35 ft. bgs) or possibly adjusted to be screened below sand lenses containing NAPL. The shallow well will be used for plume definition in the Upper Shallow unit and also screening for vapor intrusion concerns near the Marine Terminal building. The piezometer will be used for plume definition in the Lower Shallow unit and determining NAPL presence at depth in the direction toward the river. Depending on field observations, an additional piezometer may be installed that is screened in the clay (as suggested by WDNR) to potentially evaluate groundwater quality in the clay if there are indications of NAPL on top of the clay.

Soil boring SB-201 is also proposed to be installed further southeast of the proposed SB-W-104 well nest along E. Erie St. within the former MGP site boundary to investigate NAPL presence at depth at this location. If free-phase NAPL is observed in the soil matrix in sufficient quantity, OBG will be prepared to install a 1-inch temporary well at this location to monitor NAPL accumulation.

3c. Determine the extent of groundwater contamination in the Lower Shallow unit at additional locations:

- i. On the east side of the Site near the well nest W-41D, W-41S***
- ii. On the southeast side of the Site near W-45D and W-45S (Note the peat layer may not be present at that location).***

Response: OBG intends to install piezometers W-41DL and W-45DL in the Lower Shallow unit (label “DL” for deep Lower) as shown on Figure 4, where WDNR suggests installation of wells. The 5-foot screened

piezometers are proposed in the sand/silty sand layer on top of the upper clay layer (approximately 30-35 ft. bgs). The piezometers will be used for plume definition in the Lower Shallow unit.

4. Visual Aids per NR 716.15(4) Include the following with your next submittal to help illustrate how MGP residuals may have entered the Milwaukee River.

4a. Re-submit the cross-section Figure B.3.a.iv (page 133 of the Report) and identify the various utilities, including the deep tunnel in E. Erie Street and the sea wall. Add locations of where NAPL was observed in the borings. Submit additional similar cross sections from east to west terminating at borings near the river such as W-46D, W-101D&S, B-44D, and B-32D (include B-33D1&2 in those cross-sections).

Response: OBG has initially provided the historic/plant operation CSM (Figure 1) for visual aid but will also re-submit the requested cross section Figure B.3.a.iv and provide additional cross sections using both new and prior borings located near the river, adding the requested information.

4b. The DNR's review of the data interpretation suggests that the groundwater plume would include ES and PAL isoconcentration lines that extend to encompass more area beyond monitoring well W-101S and W-101D.

Response: OBG will reassess the groundwater plume extents for both the Upper Shallow and Lower Shallow units once the new wells are installed using the newly collected groundwater data.

4c. The S, I, and D monitoring well naming convention for the various monitoring well screen depths has not remained consistent over the course of the site investigation since the Retec and Atlantic Site Investigation report of 1993:

- i. Submit a table of all wells specifying the groundwater zone: Upper Shallow, Lower Shallow, and Clay; screen depth, unit and soil type; presence of peat, etc.***
- ii. Indicate where the peat layer is absent on your map figures***

Response: A table will be prepared as indicated above. Also, key groundwater figures will indicate where the peat is absent.

WORK PLAN TECHNICAL APPROACH

OVERVIEW OF SAMPLING AND ANALYSIS

The scope of the requested supplemental Site Investigation (SI) addressed by this Work Plan includes:

- Installation of additional soil borings, monitoring wells and piezometers to further identify and delineate the extent of NAPL and groundwater impacts at the Site
- If necessary, installation of soil vapor probes for vapor screening to evaluate the vapor intrusion pathway at an off-site building due to MGP constituents at the Site.
- Two rounds of groundwater monitoring to further define the extent of dissolved phase MGP-related groundwater impacts at the Site.

Investigation locations, sampling frequencies, analytical parameters, and methods to be used are presented hereafter. The planned field activities will be completed in accordance with OBG's Standard Operating Procedures (SOPs). Copies of OBG's SOPs can be provided upon request.

Prior to field mobilization, OBG will obtain City of Milwaukee permit approval to drill and install monitoring wells in the rights-of-way, and sampling locations will be cleared for subsurface exploration by calling diggers

hotline (811). All material generated as a result of the Site investigation described below will be containerized, sampled, and disposed of as appropriate at a licensed disposal facility.

SOIL BORINGS PRIOR TO MONITORING WELL INSTALLATIONS

Three soil borings (SB-W-103, SB-W-104, and SB-201) are planned to be completed at the Site (Figure 4) using hydraulic push (i.e. Geoprobe™) methods. The actual boring locations may vary and will be dependent on utilities in the street rights-of way. Borings will be drilled a minimum of 4 feet into the clay layer (approximately 35 to 40 feet bgs) and will be verified to be a depth where no further impacts are observed (4 feet of clean clay). OBG field staff will classify the soil by visual observation and perform photoionization detector (PID) field screening to confirm that MGP impacts are not present before terminating the soil boring, with possible soil samples as described below.

Boring locations will be identified and soil will be classified in accordance with ASTM Standard Practice for the Description and Identification of Soils (Visual-Manual Procedure), which is ASTM Standard D2488 – 09a, including visual observations of NAPL (if observed) and odors. If NAPL is observed, logging guidance developed specifically for MGP investigations will be used to assist the field team in describing the NAPL in borings. If observations or field screening results suggest a non-MGP related source, it will be noted on the drilling logs.

Field equipment will be calibrated prior to use. Soil borings will be continuously field-screened using a PID outfitted with a 10.6 eV lamp. Field equipment will be decontaminated following use in the field.

If a 1-inch temporary well(s) to monitor NAPL accumulation is installed, these wells will be abandoned once determined that the needed information has been collected. Soil borings/temporary wells will be abandoned in accordance with NR 141 of the Wisconsin Administrative Code (WAC). Soil boring logs and correlating abandonment forms will be provided in the Site Investigation Addendum Report. In addition, a composite sample will be collected for waste characterization and will be analyzed for waste characterization parameters as required by the landfill for disposal of the investigative-derived waste.

GROUNDWATER WELL INSTALLATIONS

Monitoring Well and Piezometer Installation

Additional groundwater investigation is proposed on the southwest side of the Site in the direction of the river including two well nests (W-103S/W-103DL and W-104S/W-104DL), and one piezometer to the east (W-41DL) and one to the southeast (W-45DL) as illustrated on Figure 4.

The wells will be installed in compliance with WAC NR 141. Hollow stem augers with a 4 -1/4-inch inside diameter will be used for the well installations. If NAPL is present in shallow sand lenses based on the logging of the Geoprobe borings (SB-W-103, SB-W-104) in the E. Erie Street right-of-way, OBG will direct the driller to use a grouted outer casing with the inside of the casing cleaned and flushed to prevent the NAPL from cross-contaminating the lower soils. The wells will be constructed of 2-inch diameter schedule 40 polyvinyl chloride (PVC) with flush mount covers. The well nests will consist of one piezometer with a 5-foot screen located in the sand/silty sand layer on top of the upper clay layer (approximately 30-35 ft. bgs) and a shallow monitoring well with a 10-foot screen in an upper layer as determined during installation of the well.

Soil analytical samples to document soil intervals with no observed MGP residual impacts may be collected (e.g., of the clay layer). These selective soil samples will be collected following the casing installation (if NAPL is present) and analyzed for the parameters identified in Table 1 including:

- VOCs – Method 8260B
- PAHs – Method 8270D

Quality assurance/quality control samples will be collected as required.

Monitoring Well Development

The six proposed monitoring wells and piezometers will be developed in accordance with WAC NR 141. Development will continue until the water is visibly clear and field parameters (pH, temperature, conductivity, etc.) stabilize (per equipment manufacturer's recommendations) or 10 well volumes of water have been removed. Purge water from well development and well sampling activities will be containerized and disposed to MMSD under their approval and applicable discharge limits or other licensed disposal facility.

Groundwater Level Measurement

Groundwater levels will be measured at all existing wells to assess the elevation and direction of groundwater flow whenever the monitoring wells and piezometers are sampled, or as needed to assess flow conditions. Water levels in wells without product will be measured with an electronic water level indicator. If DNAPL is present in a well, an electronic water level indicator for water level measurement will be used followed by a clear, bottom-filling bailer to measure product thickness. Observations and measurements regarding the presence of MGP-residuals and NAPL within a well will be recorded on the appropriate forms on which the water level measurements are recorded.

Groundwater Monitoring Well Sampling Schedule, Methods and Parameters

Two rounds of all new and existing wells in the well network will be completed for the following reasons:

- Additional definition of lateral and vertical extent of dissolved-phase impacts in the downgradient direction
- To assess plume stability and groundwater concentration trends

The groundwater sampling is consistent with the previously approved program outlined in the 2002 *Site-Wide Groundwater Investigation Report and Remedial Action Options Report (RAOR)* (Arcadis, 2002), with the exception that no monitored natural attenuation (MNA) parameters are proposed to be analyzed.

Groundwater sampling will be completed using low-flow methods, with a peristaltic pump and dedicated and disposable tubing to minimize sample turbidity. Field equipment will be calibrated prior to use. Groundwater samples will be submitted to the laboratory on ice under standard chain-of-custody procedures. All groundwater samples collected for laboratory analysis will be analyzed for the parameters identified in Table 1 including:

- VOCs – Method 8260B
- PAHs – Method 8270-SIM

Quality assurance/quality control samples will be collected as required. Field crews will note surface seal and general well conditions for potential surface water infiltration prior to sampling each well.

Results of the groundwater sampling activities will be compiled and compared to applicable Wisconsin groundwater quality standards for presentation in a Site Investigation Addendum Report. If necessary, additional groundwater monitoring events will also be described in that report.

SOIL VAPOR PROBES

For the vapor intrusion pathway assessment, as needed pending the shallow soil and groundwater quality observations near the Marine Terminal building, soil vapor probes may be installed at up to three locations. The soil vapor probes will be installed using direct push methods (Geoprobe™). The presence of visual observations, odors, and PID readings will be recorded on the probe boring log. Soil material will be classified in accordance with the USCS.

The depth to groundwater is approximately 6-8 ft. bgs. Based on this, the vapor probes will be completed at 4.5 to 5 ft. bgs. Soil vapor probes will be constructed in each borehole using of ¼-inch solid inert tubing cut to

length and connected to a six-inch long stainless steel sampling screen. After the probe is set to the desired depth, a filter pack containing sand will be set to within 2 inches above and below the vapor probe. Above the filter pack, cement-bentonite grout or granular bentonite will be placed up to the ground surface. If granular bentonite is used above the filter pack, the granular bentonite will be hydrated in 2-ft lifts up to ground surface. This bentonite will provide an airtight seal between the soil vapor probe and the ambient air. The tubing associated with the soil vapor probes will be fitted with a valve for purging and sampling. Each probe will be allowed to stabilize for at least 2 hours before sample collection.

Aerated Soil Screening

Per the RR-800 guidance document and consistent with previous vapor investigations at the Site, OBG will purge and screen the three soil vapor probes to determine if 5 ft. of aerated soil exists near the building as biodegradation of PVOC vapors occurs rapidly in the presence of oxygen. Prior to screening, a leak test will be performed for each soil vapor location to ensure that the probe assembly is properly set and not leaking. The leak test entails placing a plastic shroud filled with helium tracer gas over the soil vapor probe while collecting one liter of purged soil gas in a Tedlar™ bag. The shroud atmosphere is continuously monitored for the presence of helium using a Dielectric MGD 2002 Helium Detector and the final helium concentration inside the shroud is multiplied by 10 percent (0.1) to determine the allowable concentration of helium in the Tedlar™ bag sample. According to OBG's SOP, if the helium within the Tedlar bag exceeds the allowable concentration, corrective actions including checking and tightening all connections and otherwise enhancing the seal will be performed in the field to reduce infiltration of ambient air. Once the leak test is performed, a liter of soil gas will be purged from each location and screened for oxygen (O₂), carbon dioxide (CO₂), Lower Explosive Limit (LEL), and methane (CH₄) with a Landtec GEM 2000 Landfill Gas Meter. Field screening results will be recorded on the appropriate field form. These measurements will be compared the RR-800 aerated soil indicator parameter values of: greater than or equal to 5% oxygen, less than 1% methane, and LEL of less than 10%. The probes will be abandoned following confirmation of the collection of representative samples for screening measurements.

INVESTIGATIVE DERIVED WASTE

Field staff and/or the drilling contractor will properly containerize and label all soil cuttings in 55-gallon drums (or equivalent) and temporarily store on-site pending waste profiling results. A composite sample of the containerized soil will be collected and submitted for waste profile analysis. Once profiled, the waste will be disposed of at a licensed waste disposal facility as soon as practicable.

Decontamination water in conjunction with the well purge/development water will be also be temporarily stored on-site pending water analytical profiling results. Decontamination water will be disposed to MMSD under their approval, in conjunction with the well purge/development water.

SCHEDULING

The Geoprobe soil borings and monitoring well installations are anticipated to be completed in summer 2019. If needed, the soil vapor probes will be installed and screened for aerated soil indicators within one to months after soil boring and monitoring well sampling. Groundwater sampling will be completed in summer and fall 2019.

REPORTING

Following substantial completion of the field investigation, a NR 716 Site Investigation (SI) Addendum Report will be prepared. The SI report will include required NR 716 site information and certification requirements.

REFERENCES

OBG, 2018, September 5 (Revision), Technical Memorandum, *Response to Case Closure Denial Comments – Sitewide Groundwater Conditions Update Report*

WDNR, 2017, April 4, Email, *Subject: 3rd Ward MGP – City of Milwaukee (Jefferson Block) parcel (BRRTS #02-41-557054) VI Tech Memo Response to Questions/ Vapor Site Investigation Completeness from John Feeney (WDNR) to Frank Dombrowski (We Energies)*

WDNR 2017, June 27 Letter, *Review of Supplemental Vapor Intrusion Assessment Report, Peters=Johnson 3rd Ward Coal Gas MGP, 425 East Menomonee Street and 444 East Corcoran Avenue, Milwaukee, WI BRRTS #: 02-41-000320*

WDNR 2017, September 5 Letter, *Review of Remedial Action Options Report, Former 3rd Ward MGP site, Catalano Square, 143 N. Milwaukee St. and 310 E. Erie St., Milwaukee, WI BRRTS# 02-41-577202*

WDNR 2018 January Guidance Document, *RR-800 Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin*

WDNR 2018, November 15 Letter, *Review of “Response to Case Closure Denial Comments – Sitewide Groundwater Conditions Update Report” and Site Investigation Completeness, 3rd Ward Manufactured Gas Plant (MGP) Site, Milwaukee, WI*

Sincerely,
O'BRIEN & GERE ENGINEERS, INC.

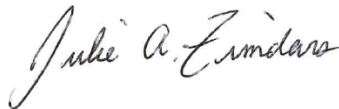


GRAHAM FAZIO
Project Scientist



BRIAN G. HENNINGS, PG
Senior Managing Hydrogeologist

"I, BRIAN G. HENNINGS, HEREBY CERTIFY THAT I AM A HYDROGEOLOGIST AS THAT TERM IS DEFINED IN S. NR 712.03 (1), WIS. ADM. CODE, AM REGISTERED IN ACCORDANCE WITH THE REQUIREMENTS OF CH. GHSS 2, WIS. ADM. CODE, OR LICENSED IN ACCORDANCE WITH THE REQUIREMENTS OF CH. GHSS 3, WIS. ADM. CODE, AND THAT, TO THE BEST OF MY KNOWLEDGE, ALL OF THE INFORMATION CONTAINED IN THIS DOCUMENT IS CORRECT AND THE DOCUMENT WAS PREPARED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS IN CHS. NR 700 TO 726, WIS. ADM. CODE."



JULIE A. ZIMDARS, PE #31452
Senior Managing Engineer

"I, JULIE A. ZIMDARS, HEREBY CERTIFY THAT I AM A REGISTERED PROFESSIONAL ENGINEER IN THE STATE OF WISCONSIN, REGISTERED IN ACCORDANCE WITH THE REQUIREMENTS OF CH. [A-E 4](#), WIS. ADM. CODE; THAT THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE RULES OF PROFESSIONAL CONDUCT IN CH. [A-E 8](#), WIS. ADM. CODE; AND THAT, TO THE BEST OF MY KNOWLEDGE, ALL INFORMATION CONTAINED IN THIS DOCUMENT IS CORRECT AND THE DOCUMENT WAS PREPARED IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS IN CHS. [NR 700 TO 726](#), WIS. ADM. CODE."

ATTACHMENTS

Tables:

Table 1 Sampling and Analysis Plan Summary

Figures:

Figure 1 Plant Operation Conceptual Site Model (CSM)

Figure 2 Present Day Conceptual Site Model (CSM)

Figure 3 Vapor Intrusion Screening Locations

Figure 4 Proposed Soil Boring and Monitoring Well Locations

Attachments:

Attachment 1 April 1, 2019 WDNR Technical Assistance Meeting Minutes

Attachment 2 MMSD Sewer and Detail Maps of Large Diameter Sewers in E. Erie Street

Attachment 3 Boring Log of W-20S/I with Zone of LNAPL



Tables

Table 1. Sampling and Analysis Plan Summary

Site Investigation Work Plan

Former Third Ward MGP

BRRTS: 02-41-000320, 02-41-557054, 02-41-557057, 02-41-577202

Sample Type/Location	Parameter	Method	Container Type/ Collection Device	Minimum Volume	Preservation (Cool to 4° ≥ 2°C All Samples)	Holding Time from Sample Date
Soil Screening/Logging/Sampling						
Soil Borings Select samples may be analyzed to document soil intervals with no observed MGP impacts (e.g. clay layer)	NAPL Observations	Visual/Odor/PID	--	--	--	--
	VOCs	8260B	Lab-supplied	2 oz.	methanol	14 days
	PAHs	8270D	amber glass	4 oz.		14/40 days
One composite soil sample for waste characterization	As required by the landfill	Various				
Groundwater Samples						
Groundwater - Well Network Two rounds, qrtly approx. Existing network and new wells	VOCs	8260B	glass vial	3-40 ml	HCl to pH<2, Zero Hsp ⁴	14 days
	PAHs	8270-SIM	amber glass	1 liter		14 days
	Field Parameters ³	Field	field measured			
Vapor Screening						
Vapor Probes (Installation to be determined) - Screening for Aerated Soil	Oxygen	Landtec GEM 2000	Tedlar bag	1 liter		Immediate
	Carbon Dioxide	Landtec GEM 2000	Tedlar bag	1 liter		Immediate
	Methane	Landtec GEM 2000	Tedlar bag	1 liter		Immediate
	LEL	Landtec GEM 2000	Tedlar bag	1 liter		Immediate

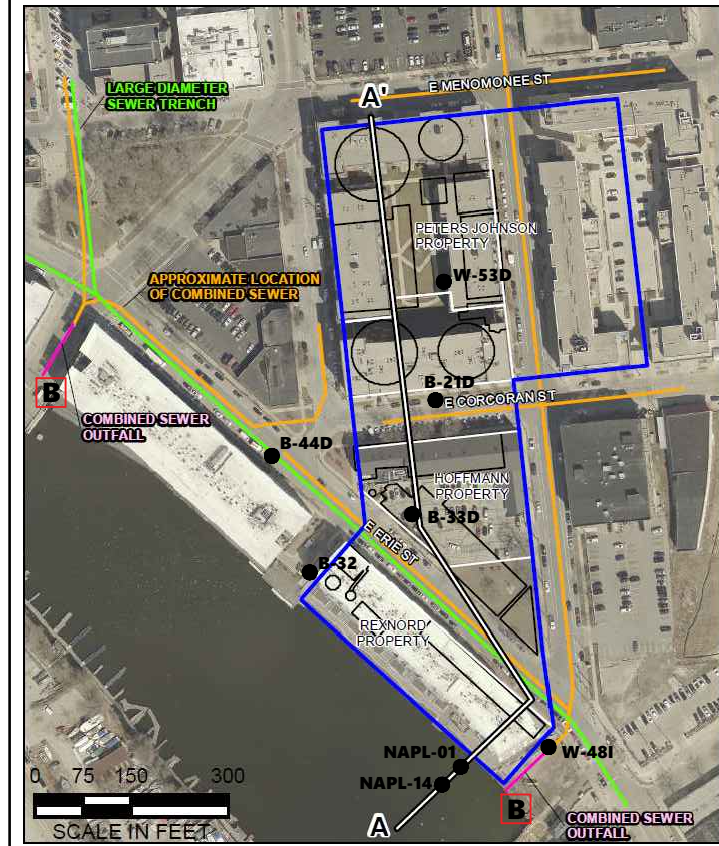
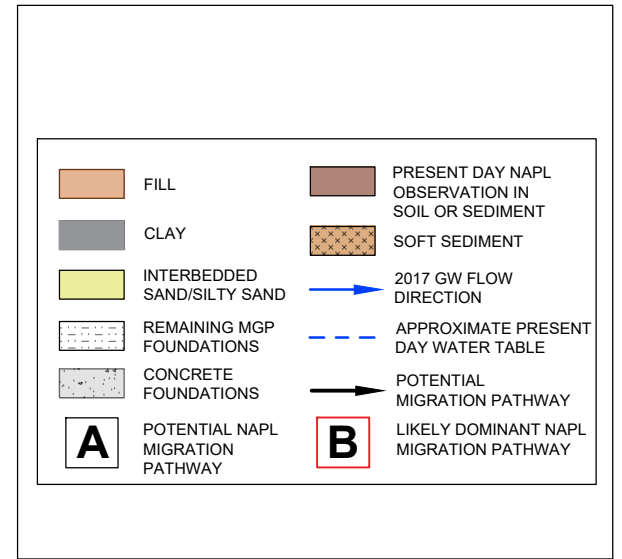
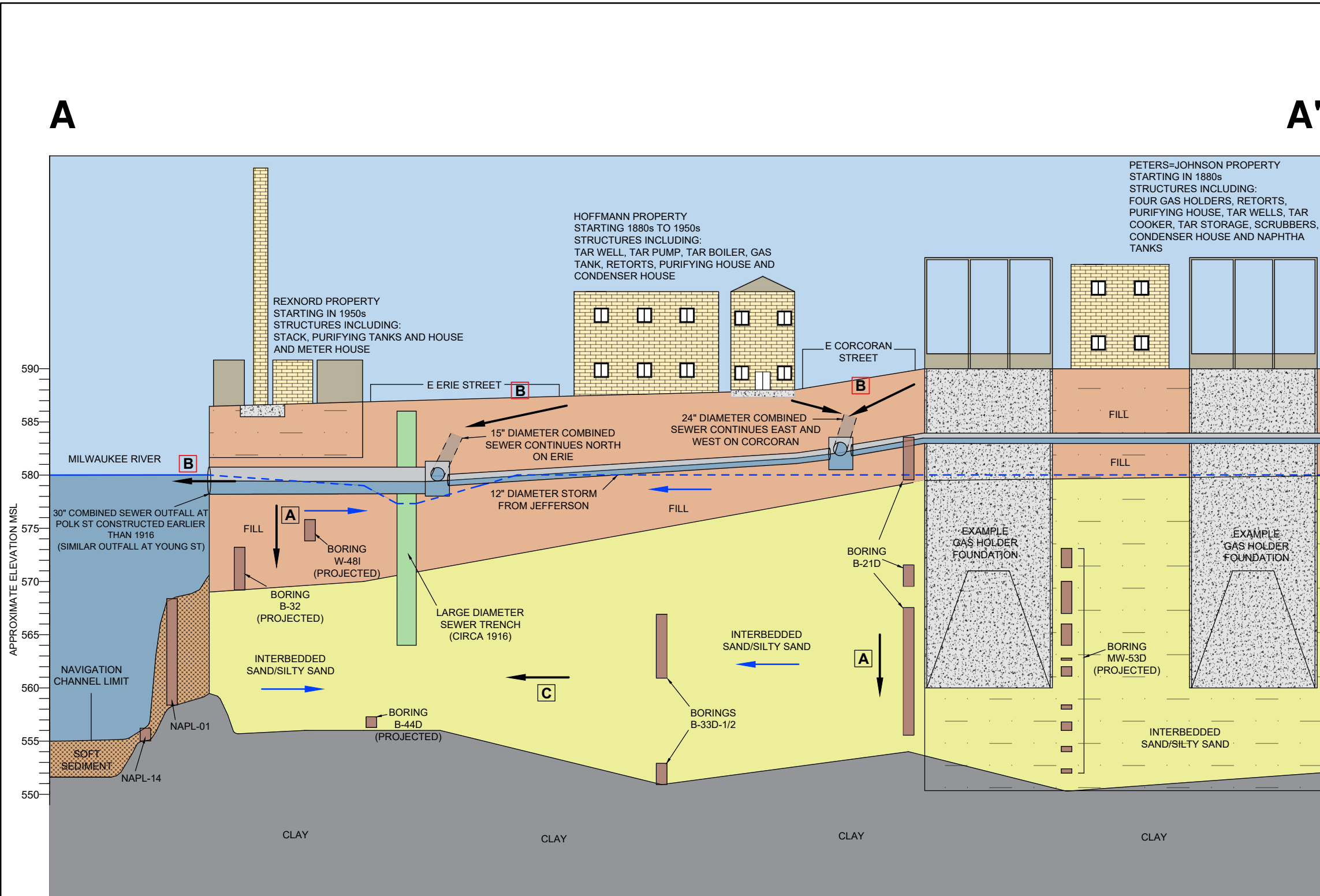
Notes:

1. Field duplicates will be collected at a frequency of one per group of ten or fewer for groundwater samples.
2. Equipment blanks will be collected at a frequency of one per sampling day with non-dedicated sampling equipment.
3. Field parameters include temperature, pH, specific conductivity, oxidation-reduction potential, turbidity and dissolved oxygen
4. "Zero Hsp" is Zero Headspace for water VOC analyses.
5. Trip blanks will accompany each cooler containing VOC water samples, including equipment blanks.
6. The monitoring program follows Table 8-1 from the 2002 Site-Wide Groundwater Investigation Report and RAOR (Arcadis, 2002), except MNA not included



Figures

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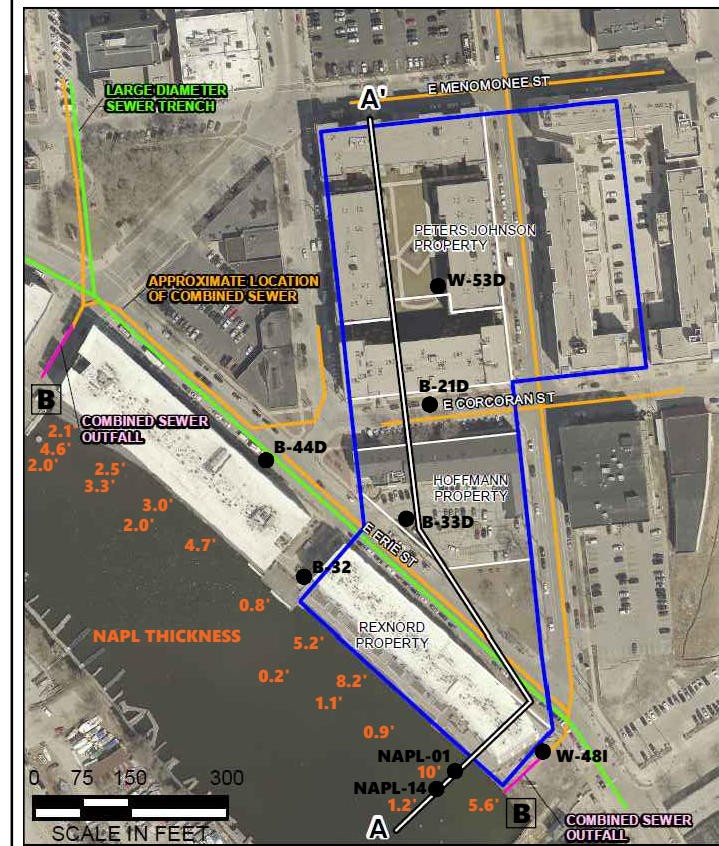
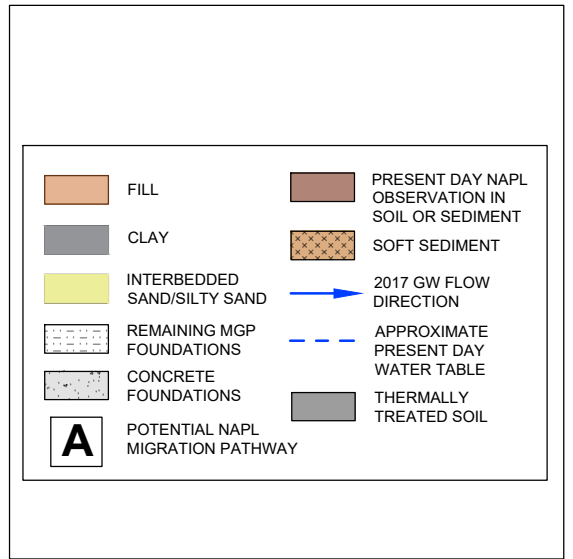
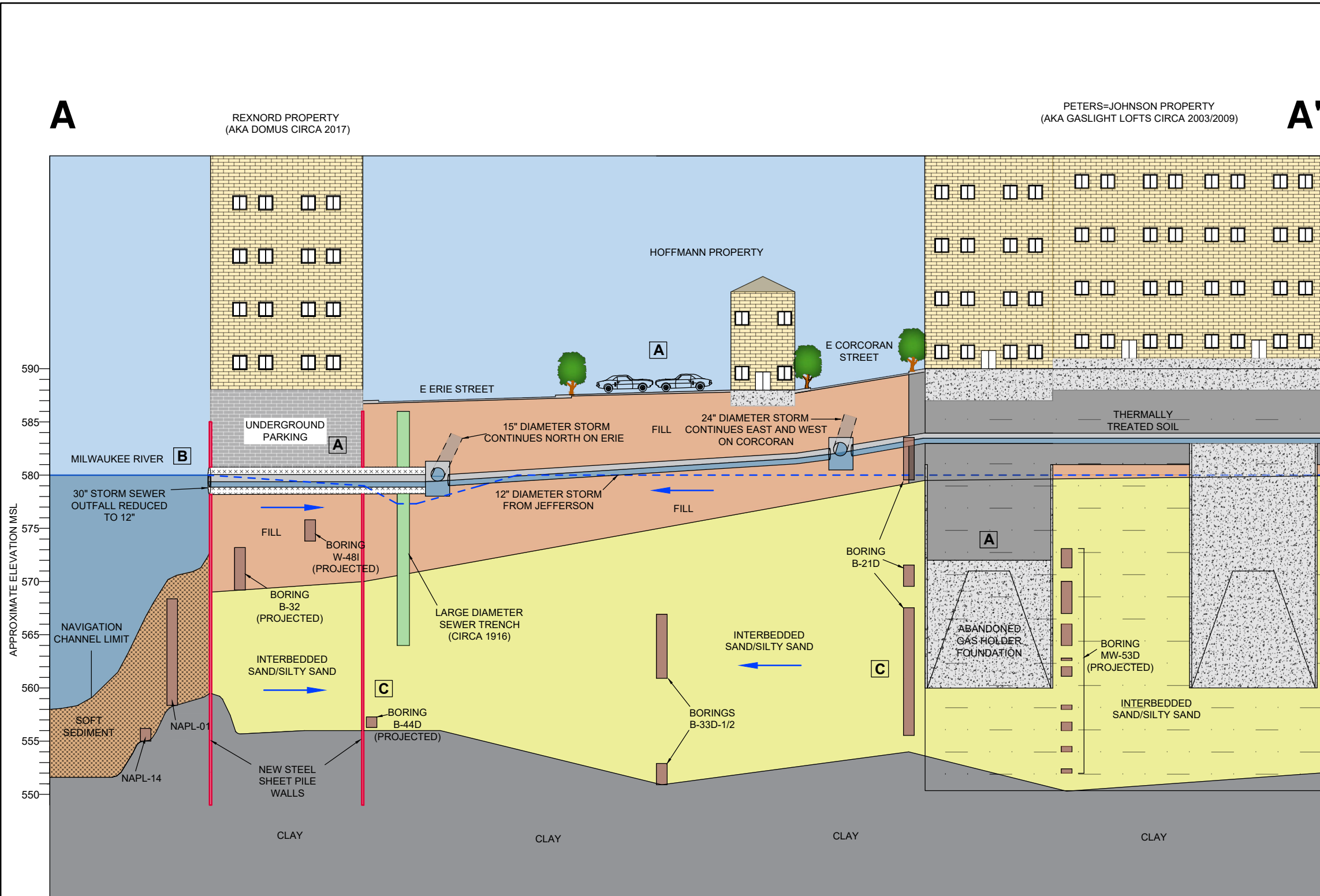
PLANT OPERATION CSM
FORMER THIRD WARD MGP
MILWAUKEE, WISCONSIN

5/6/2019



- A** Potential vertical soil migration pathway, NAPL observations appear to be associated with former MGP operations located above the observations.
- B** Potential utility conveyance pathway, NAPL observations lie directly on top of clay in the river, suggesting vertical deposition from outfalls. Thickest observations in sediment are near sewer outfalls.
- C** Potential secondary horizontal soil migration pathway, NAPL observations appear in inter-bedded sandy lenses at depth below clean intervals. The NAPL observations in sediment do not directly correlate in elevation to upland observations near the river, suggesting a different main pathway to the river.

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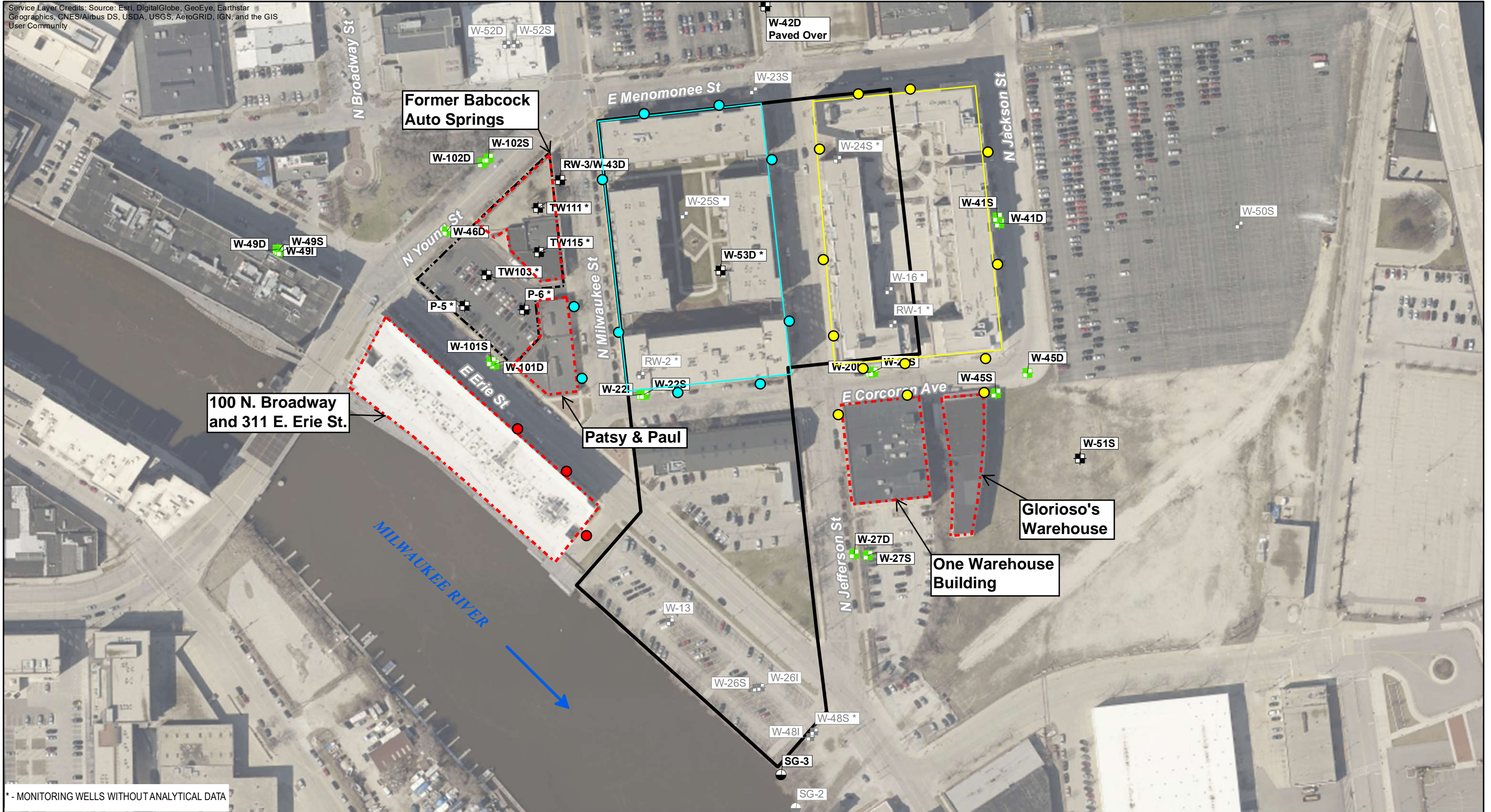
- A** Historic vertical soil migration pathway, addressed through remediation and redevelopment (soil treatment and infiltration caps).
- B** Historic utility conveyance pathway, addressed through remediation and redevelopment, as indicated by the presence of clean sediment over the top of NAPL observations.
- C** Potential historic secondary horizontal soil migration pathway, NAPL observations appear in inter-bedded sandy lenses at depth below clean intervals. Testing indicates NAPL is stable, and sheet pile walls provide supplemental barrier for lateral migration (new sheet pile dockwall and Erie St. sheet pile wall installed for DoMus building, sheet pile dockwall along Marine Terminal building in good condition)

PRESENT DAY CSM
FORMER THIRD WARD MGP
MILWAUKEE, WISCONSIN

5/6/2019



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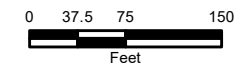


* - MONITORING WELLS WITHOUT ANALYTICAL DATA

- COMPLETED CITY OF MILWAUKEE PROPERTY INVESTIGATION (GEOSYNTec FEBRUARY 2017)
- COMPLETED PETERS-JOHNSON PROPERTY INVESTIGATION (OBG MAY 2017)
- POSSIBLE PROPOSED SOIL VAPOR SCREENING LOCATIONS IN ROW PENDING SHALLOW SOIL AND GROUNDWATER OBSERVATIONS
- OFF-SITE BUILDINGS
- WELL IN MONITORING PROGRAM
- WELL NOT IN MONITORING PROGRAM
- STAFF GAUGE
- ABANDONED MONITORING WELL
- ABANDONED STAFF GAUGE
- ONE CATALANO SQUARE PROPERTY
- FORMER THIRD WARD MGP SITE BOUNDARY

FORMER THIRD WARD MGP MILWAUKEE, WISCONSIN

VAPOR INTRUSION SCREENING LOCATIONS



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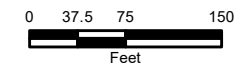
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



* - MONITORING WELLS WITHOUT ANALYTICAL DATA

- PROPOSED UPPER SHALLOW UNIT MONITORING WELL
- PROPOSED LOWER SHALLOW UNIT MONITORING WELL
- PROPOSED SOIL BORING
- HISTORIC SOIL BORING
- APPROXIMATE LOCATION OF 49" X 68" METROPOLITAN INTERCEPTOR SEWER AND 54" NEAR SURFACE COLLECTOR
- WELL IN MONITORING PROGRAM
- WELL NOT IN MONITORING PROGRAM
- STAFF GAUGE
- ABANDONED MONITORING WELL
- ABANDONED STAFF GAUGE
- ONE CATALANO SQUARE PROPERTY
- FORMER THIRD WARD MGP SITE BOUNDARY


FORMER THIRD WARD MGP MILWAUKEE, WISCONSIN



PROPOSED SOIL BORING AND MONITORING WELL LOCATIONS



Y:\Mapping\Projects\2312357\MXD\Figure 1_Proposed Investigation Locations.mxd



Attachment 1
April 1, 2019 WDNR
Technical Assistance
Meeting Minutes

FORMER WE ENERGIES THIRD WARD MGP SITE, MILWAUKEE, WI

LOCATION: DNR Southeast/Milwaukee

DATE: April 1, 2019, 2:00 pm

ATTENDEES: WDNR (Judy Fassbender, Margaret Brunette, Michele Norman, John Feeney, Scott Inman - via conference call) Mandel Group (Bob Monnat, Scott Leedom), We Energies (Brian Bartoszek, Frank Dombrowski), OBG (Julie Zimdars)

[Minutes by OBG are in Bold with Action items agreed to Underlined; Agenda item/topic not Bolded]

Item	Discussion/Submittal
1	Introductions
2	<p>WDNR Response (11/15/18) to “Response to Case Closure Denial Comments – Sitewide Groundwater Conditions Update Report” Sept., 2018</p> <p>Summary/General Concerns of We Energies:</p> <ol style="list-style-type: none"> 1. Desire a consensus that these remaining/final concerns raised in Nov. 15, 2018 letter can be addressed and a closure request can proceed for Peters=Johnson when property-specific concerns are addressed. If other side-wide concerns remain, can be addressed under the remaining open BRRTS cases.
3	<p>General timeline of deliverables/accomplishments and volume of SI documentation for 3rd Ward site</p> <ul style="list-style-type: none"> Specific focus on BRRTS case for “Peters=Johnson” parcel (Mandel Group property) <p>WDNR comments about Peters=Johnson parcel and closure outlook:</p> <ol style="list-style-type: none"> 1. WDNR pointed out that a closure letter for Peters=Johnson, if written, would likely include a clause about the buildings being a structural impediment. If the buildings were removed for any reason in the future, the remaining MGP source material would be required to be investigated and potentially addressed by either existing or new/future remedial technologies. 2. WDNR asked about the agreement between We Energies and Mandel Group and if that could be made available. This could address some of the WDNR concerns with closure of the Peters=Johnson property. 3. OBG commented about the Cap Maintenance Plan that currently exists which includes a requirement for crack repair of the post-tensioned slab. This requirement may have been partially included for vapor intrusion, but would no longer be needed for either vapor intrusion or infiltration, based on the DNR-approved VI screening Assessment completed by OBG in 2017. Also, since the buildings are constructed over virtually the entire property, infiltration is not occurring (the building roof is the cap). A new cap maintenance plan will be drafted in conjunction with the closure request to include this language.
4	<p>Mandel Group’s Perspective on Importance of DNR Case Closure of their property</p> <ol style="list-style-type: none"> 1. Provided by Bob Monnat. Noted that the absence of regulatory case closure has important implications for refinancing property and for attracting investment capital. There is also potential liability questions for tenants and residents.
5	<p>Path to closure of Mandel Group’s property given its current status (similar to 2 others closed parcels)</p> <ul style="list-style-type: none"> Vapor pathway assessment approved Original remediation and redevelopment completed with WDNR concurrence Current condition of property: no complete pathways, no practicable means for further SI or remediation <ol style="list-style-type: none"> 1. Mandel/We Energies/ OBG summarized past approvals and current conditions of property.

Addressing other issues raised in Nov. 15, 2018 letter

1. LNAPL concern for potential for migration in sewers/utilities –

a. WDNR's concern is with the potential migration of LNAPL in the backfill of the sewer(s) in Corcoran Avenue. WDNR asked about the depth/construction of the sewers in this area, which OBG indicated will require coordination with the City and/or MMSD to find out to help address this concern. Also, we indicated there is likely co-mingling of diesel from former RR roundhouse property to the east/southeast based on previous fingerprint analyses of the LNAPL from the shallow monitoring well nearest this area. WDNR pointed out that LNAPL was historically present in well W-16 on the City of Milwaukee property (north of W-20S that contains the LNAPL). OBG to address this concern which may include a rationale or reasoning for lack of migration occurring in the sewers/utilities in lieu of additional investigation.

2. VI Assessments at abutting properties/off-site buildings –

a. OBG pointed out completed vapor screening locations (3) on south side of Corcoran Street (near Glorioso's Warehouse and One Warehouse building) and also 2 locations on west side of Milwaukee Street near Patsy and Paul's building. WDNR (John Feeney) agreed to re-look at the two reports submitted and approved for vapor intrusion, for Peters=Johnson and City of Milwaukee parcels, and provide a follow-up response regarding VI concerns for these near-by buildings.

b. Discussion occurred regarding the shallow soil and groundwater conditions near the former Marine Terminal building (100 N. Broadway, and 311 E. Erie Street) and need for vapor intrusion screening. WDNR agreed that if shallow conditions along Erie Street and adjacent to this building (W-101S, B-44D plus potential additional Geoprobe boring locations and/or shallow MWs) do not indicate a vapor concern then OBG should include a reasoning for the pathway not being complete (RR-800). WDNR commented that addressing this vapor concern is tied to closure of Peters=Johnson (as the original location of source material).

3. Shallow and deep groundwater remaining concerns –

a. WDNR requested more information as to groundwater flow and quality of the groundwater between site and the river related to the large sewers in Erie Street and also to the east near Corcoran and Jackson Streets in the lower shallow unit. Based on WDNR's feedback in the meeting, OBG will assess the need and provide rationale for either proposing or not proposing installation of the requested wells.

4. Sediment concern with upland NAPL remaining –

a. OBG presented a conceptual theory of how the NAPL entered the river through the historic, early 1900's sewer outfalls at both Jefferson/Polk Street (extended) and Broadway/Young Street (extended), and possibly smaller point discharges between these locations. OBG to develop 2 Conceptual Site Models (CSMs), one for historic conditions and one for current conditions. The one for the current conditions needs supporting data and reasoning to make the case that sediment in the river will not be re-contaminated through the soil matrix with upland NAPL remaining. Mandel to assist with providing as-built records of the sheet pile walls installed for the DoMus building construction, both along Erie Street and for the new dockwall construction.

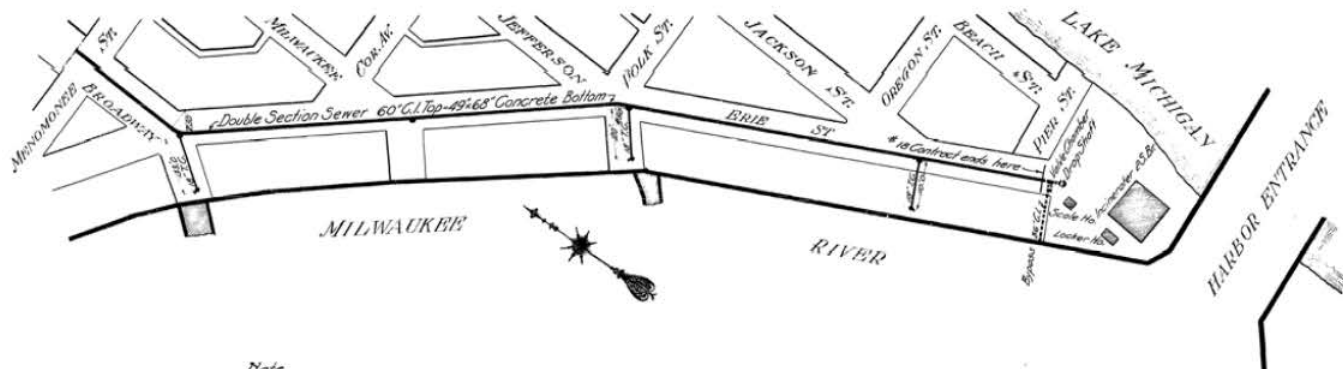
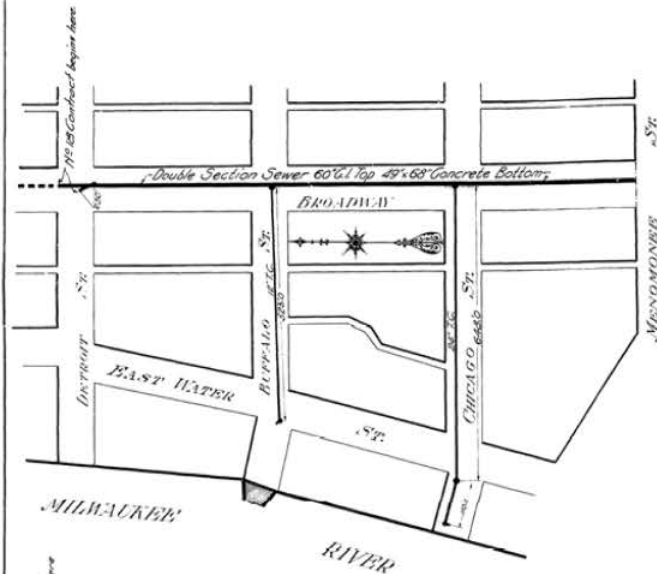
Expectations for the future activities/action items:

- 7**
- 1. We Energies/OBG to provide a response to comments to the Nov. 15, 2018 letter, supporting information (CSMs) and SI work plan by May 8, 2019.**

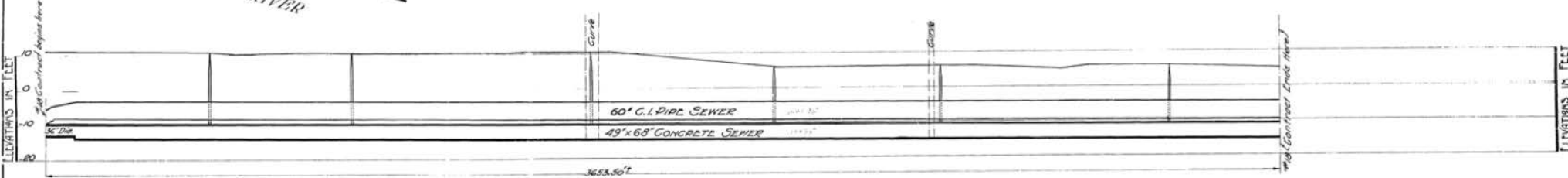


Attachment 2

MMSD Sewer and Detail Maps of Large Diameter Sewers in E. Erie Street



Note
The curves shown in the sewer line will require approximately 4'-0" x 68" C.I. beds, the cost of forming and placing said beds is to be included in the unit price named in the Proposal for 60" and 49" x 68" sewers.



PROPOSED INTERCEPTING SEWERS

TO BE LOCATED ON THE

EAST SIDE OF THE MILWAUKEE RIVER

CONTRACT NO. 18
SET OF 7 SHEETS

KEY

Sheet 191 - General Location Plan	File 4-800
1. Broadway from Detroit St. to Chicago St. - Sewer X Sections	801
2. Broadway and Erie St. from Chicago St. to Siphon Shaft	802
3. Lateral Sewers in Trenches Chicago Broadway-Par. & Par. Sts.	803
4. Manhole Details	804
5. Junction Chamber at Broadway and Detroit Sts.	805
6. Test Borings	806

Note
In profile, the designated underground structures, with the exception of existing sewers and heating tunnels, are shown in single lines only. Each single line representing the flow line where signs are indicated and inside bottoms where standards are indicated. All underground structures of which the Sewerage Commission has records are shown in street plans. The following explanation applies to abbreviations shown on drawings: *sh* indicates signs or markers; *brk.* - *Conc.* indicates concrete. *Base* indicates basement.

Horizontal Scale in feet
Vertical Scale in feet

- LEGEND**
- — — — — INDICATES WATER & FIRE MAINS
 - — — — — GAS MAINS
 - — — — — ELECTRIC CONDUITS
 - — — — — EXISTING SEWERS
 - — — — — HEATING TUNNEL
 - — — — — PROPOSED SEWER
 - — — — — CAR TRACKS



INTERCEPTING SEWERS
Contract No. 18
East Side of Milwaukee River
NEWSEWER COMMISSION OF THE CITY OF MILWAUKEE
PLAN SHOWING
GENERAL LAYOUT

APPROVED BY SEWERAGE COMMISSION
JUN 6 1918
S. W. H. [Signature]
CITY ENGINEER

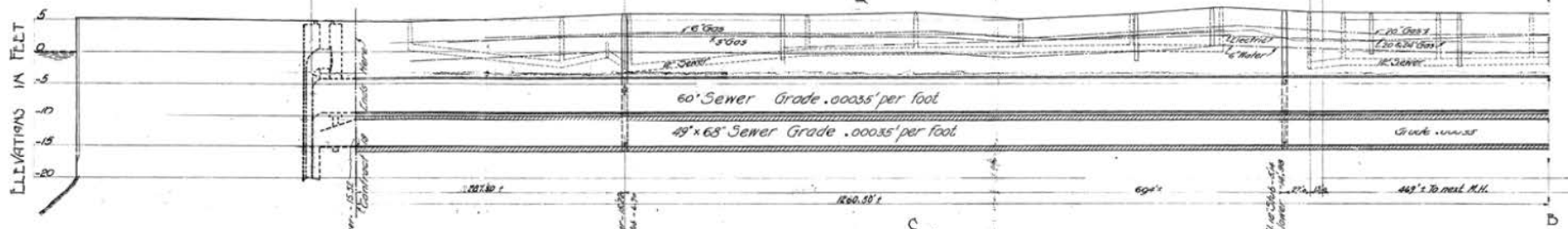
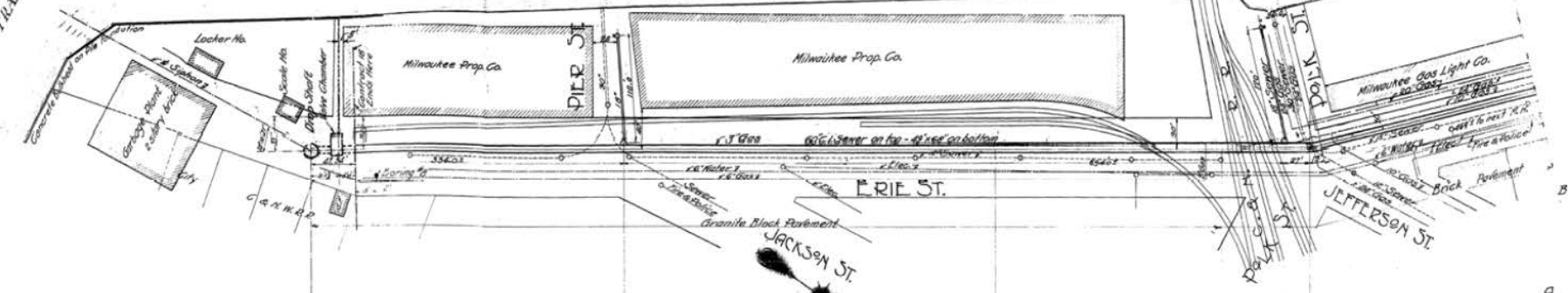
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VERTICAL SCALE 1" = 10'
HORIZONTAL SCALE FULL SIZE
CONTRACTOR [Signature]

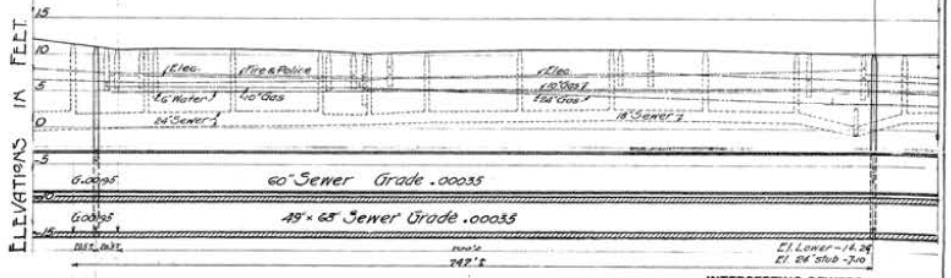
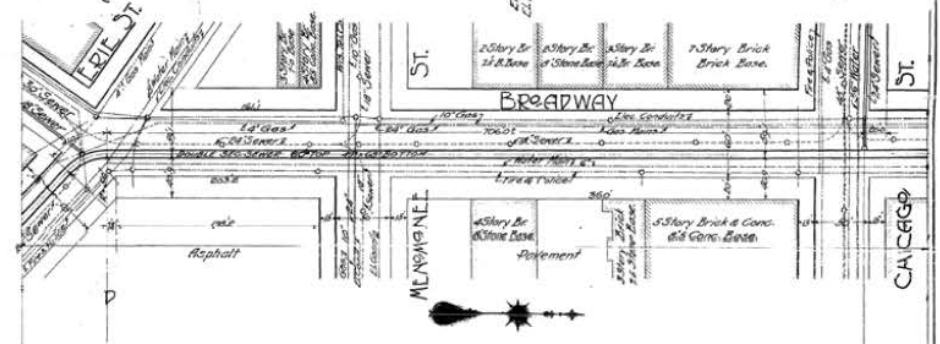
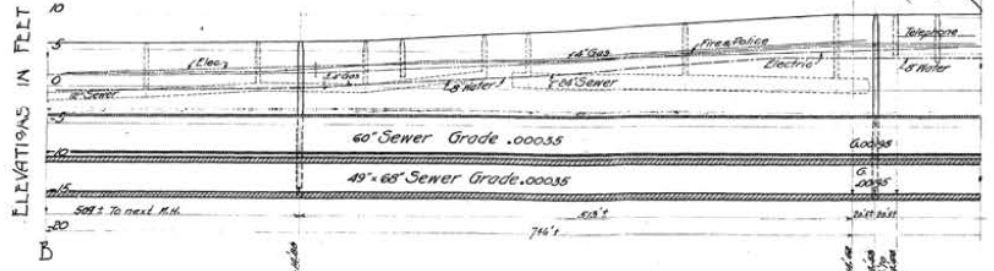
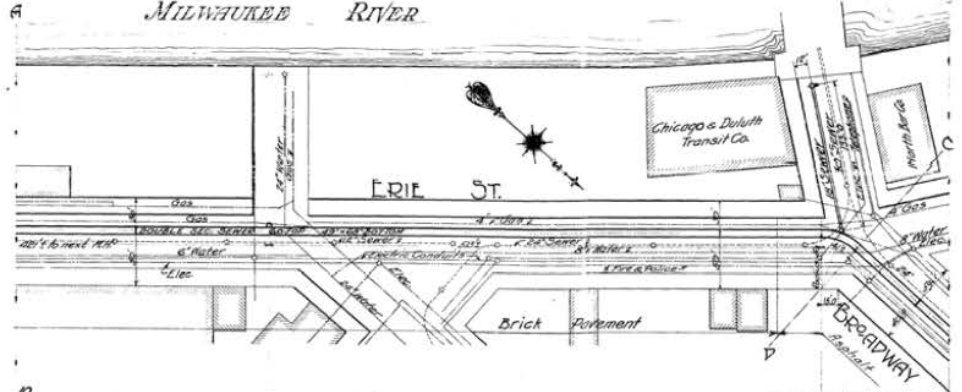
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MILWAUKEE RIVER

HARBOR ENTRANCE



MILWAUKEE RIVER



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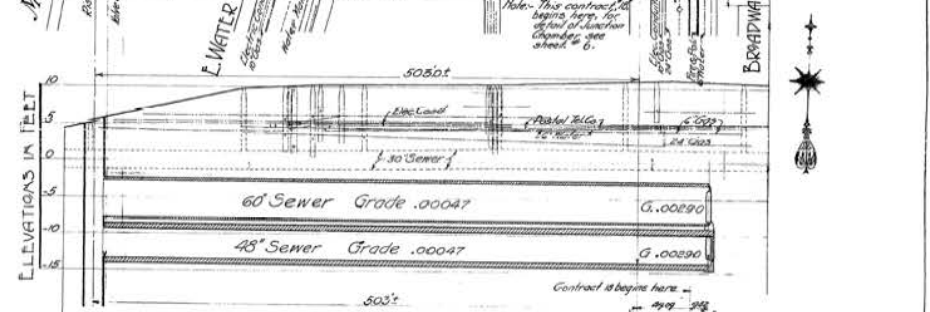
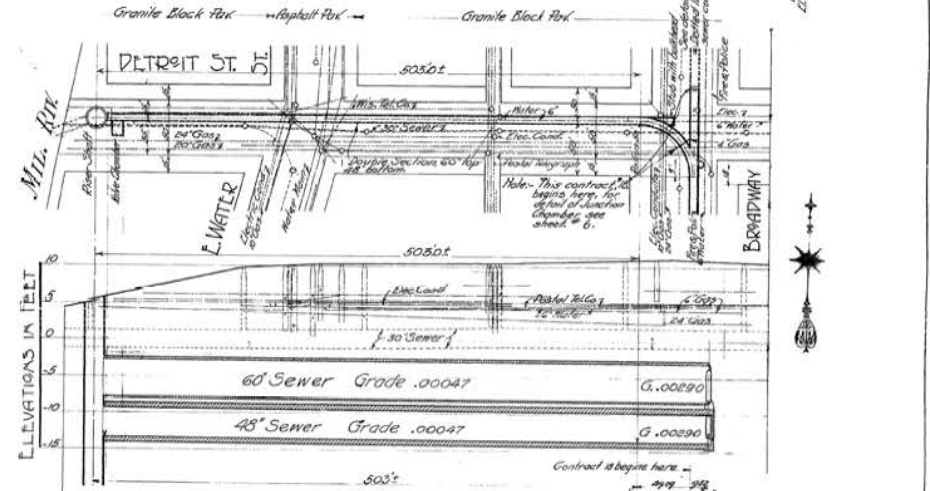
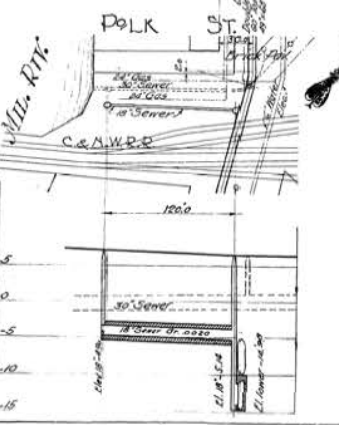
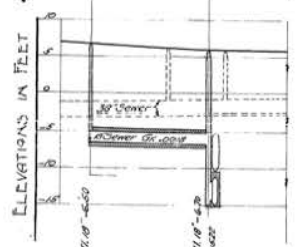
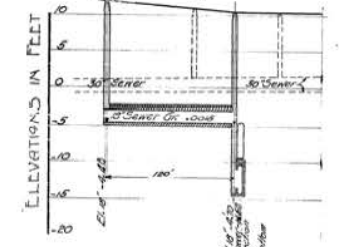
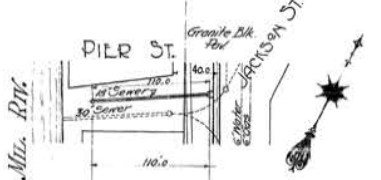
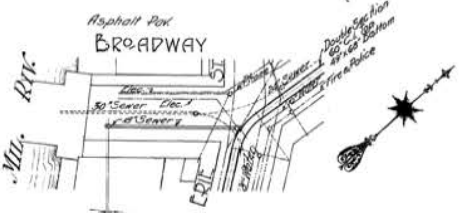
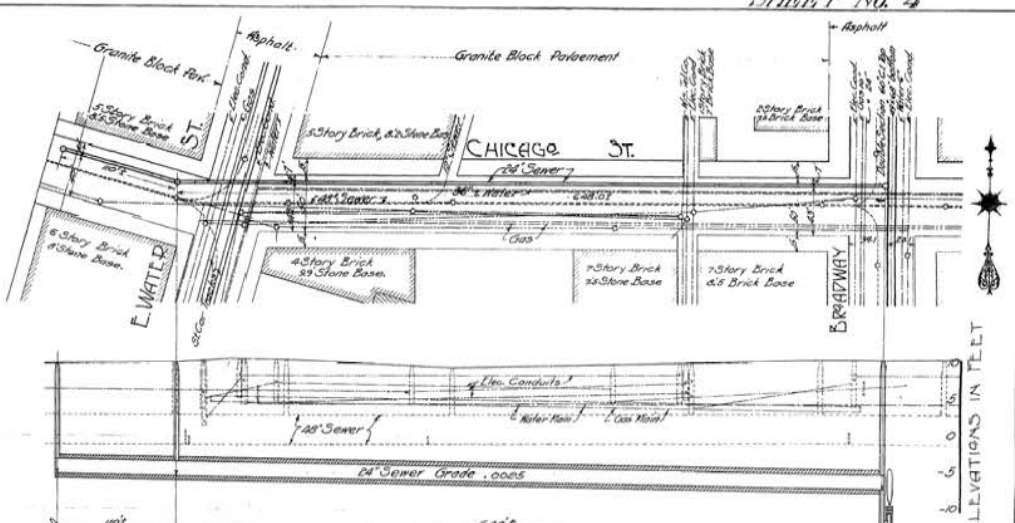
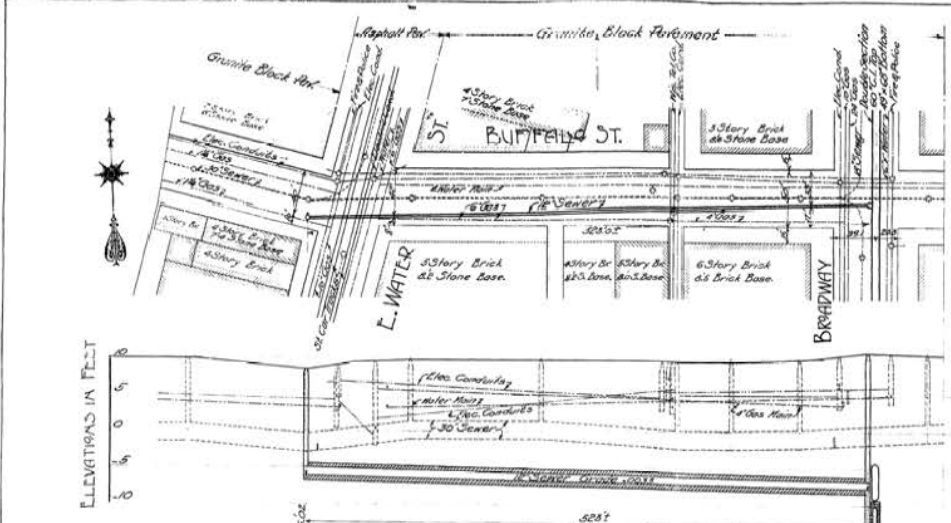
INTERCEPTING SEWERS
 Contract No. 15
 East Side of Milwaukee River

METROPOLITAN ENGINEERS OF THE CITY OF MILWAUKEE
 PLAN SHOWING
 STREET PLANS

APPROVED BY SEWERAGE COMMISSION
 1916
 1916

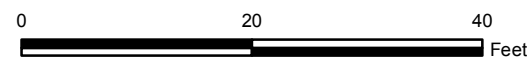
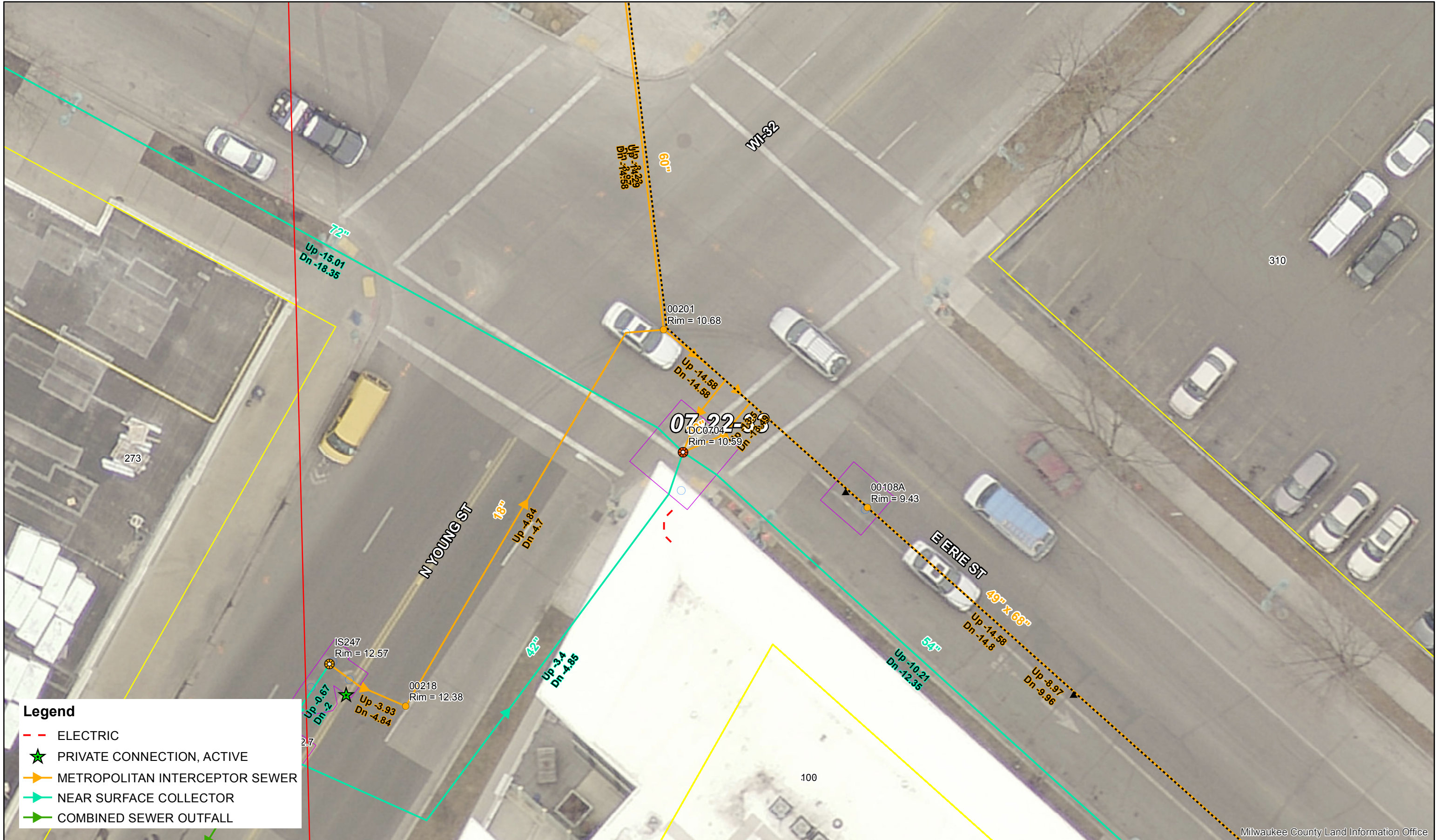
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 CONTRACT NO. 15-15
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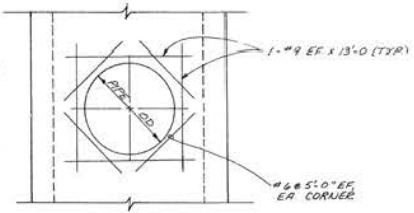
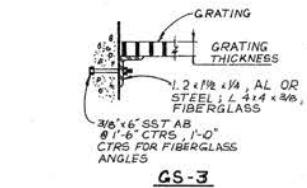
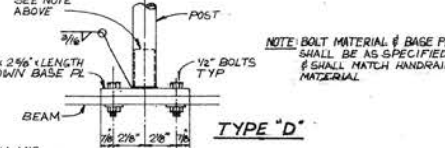
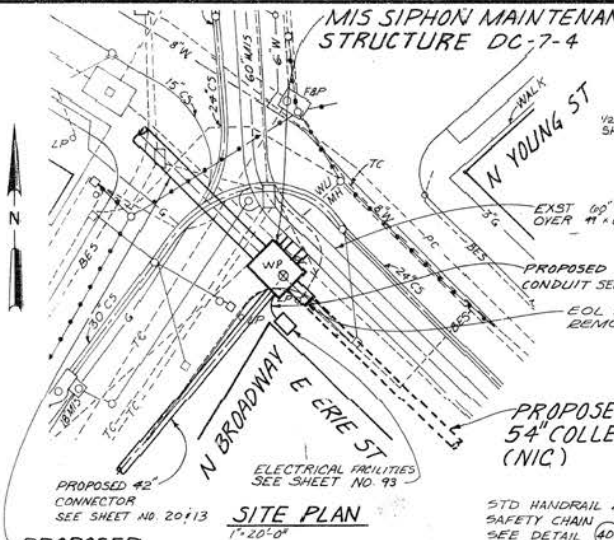
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INTERCEPTING SEWERS
 Contract No. 18
 East Side of Milwaukee River
 MUNICIPAL ENGINEERING DEPARTMENT OF THE CITY OF MILWAUKEE
 PLAN SHOWING
LATERAL SEWERS
 APPROVED BY SEWERAGE COMMISSION
 JUNE 6 1916
 J. H. HANCOCK, CHIEF ENGINEER
 J. H. HANCOCK, CHIEF ENGINEER
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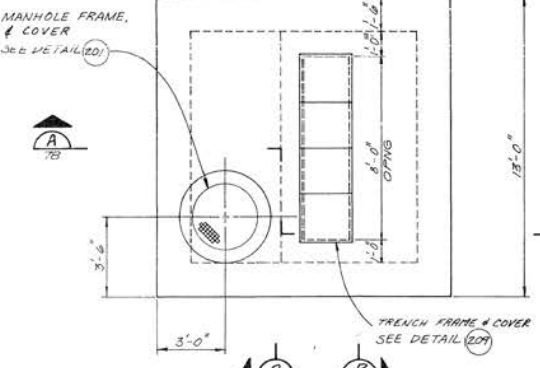
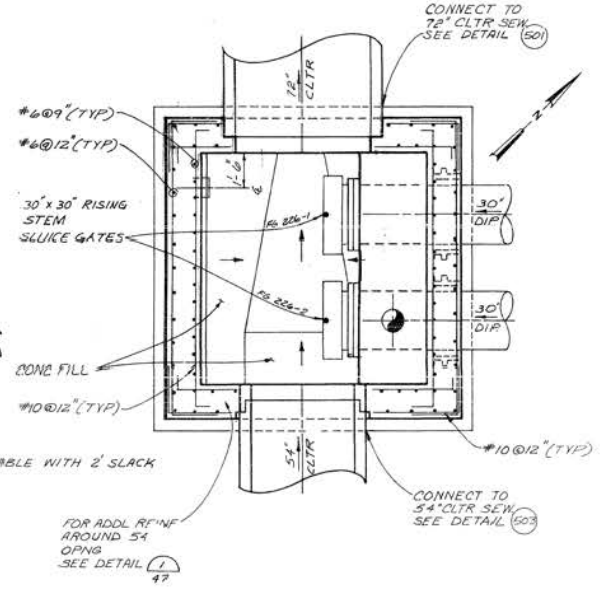
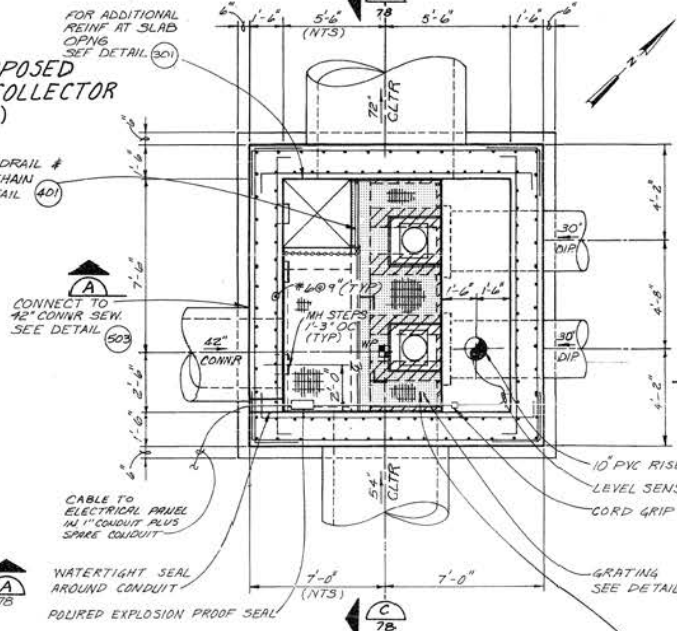
MIS SIPHON MAINTENANCE STRUCTURE DC-7-4

NOTE: WELD STL & SST AS SHOWN. PROVIDE A SPECIAL CONN FOR AL THAT WILL DEVELOP FULL STRENGTH OF PIPE. SUBMIT TEST DATA ON SHOP DWGS FOR REVIEW.



SITE PLAN
1" = 20'-0"

PROPOSED 54" COLLECTOR (NIC)



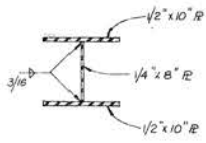
TOP PLAN
3/8" = 1'-0"

GRATING IN SHADED AREA & CROSS-HATCHED SUPPORT MEMBERS SHALL BE FABRICATED TO ALLOW FOR DISASSEMBLY & REMOVAL OF SLUDGE GATES

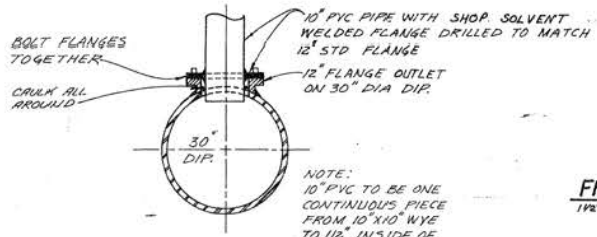
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2. FOR INSTRUMENTATION AND CONTROL DETAILS, SEE SHEET NO 93

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DEC 1991

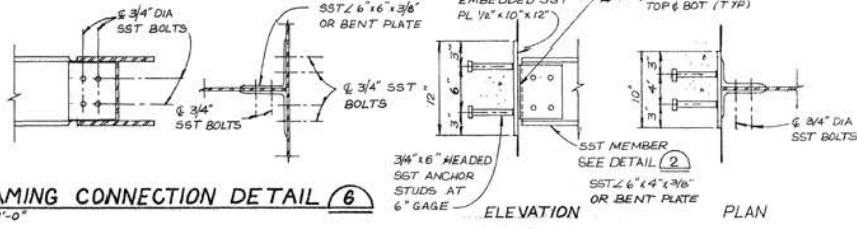
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	<p>96 11 21</p>				



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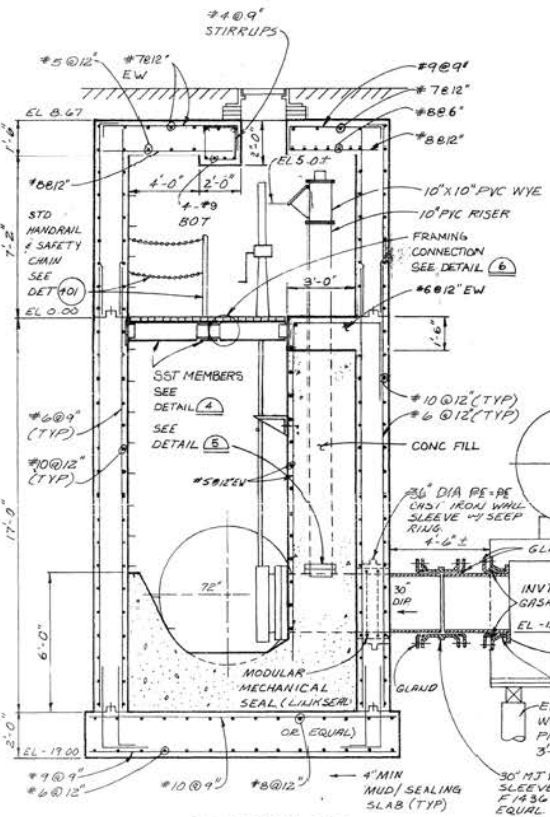


DETAIL 5
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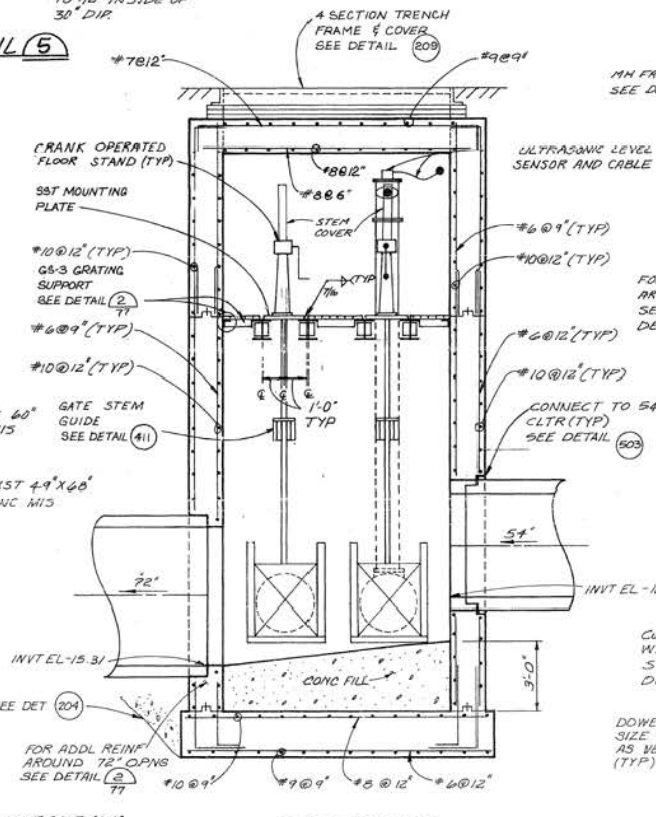


FRAMING CONNECTION DETAIL 6
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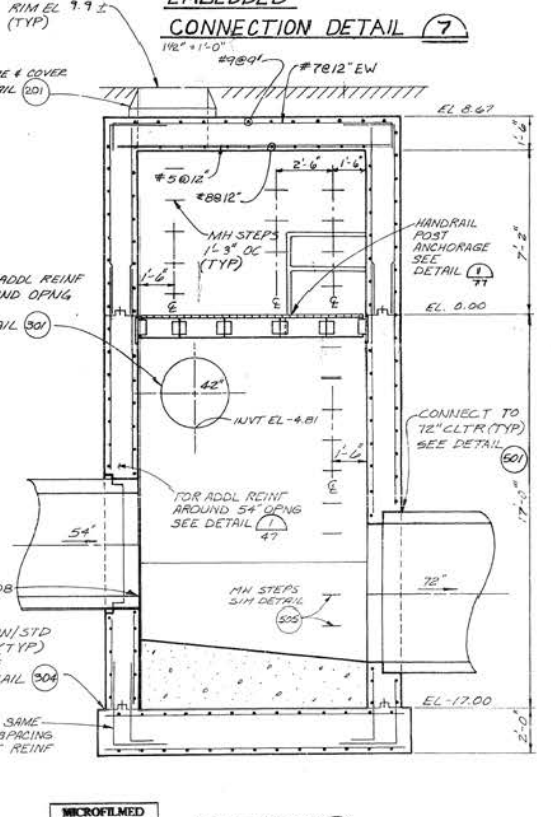
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1/2" x 10"



SECTION A
3/8" x 10"



SECTION B
3/8" x 10"



SECTION C
3/8" x 10"

VERIFY SCALES BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	DSGN 774 DR BP	THIS DESIGN PREPARED FOR CH2MHILL, INC. PRIME CONSULTANT TO MILWAUKEE METROPOLITAN SEWERAGE DISTRICT BY Black & Veatch ENGINEERS ARCHITECTS KANSAS CITY, MO. IN ASSOCIATION WITH GRAEF, ANHALT, SCHLOEMER & ASSOC. KAPUR & ASSOC. INC. AND EMCS INC.		MILWAUKEE METROPOLITAN SEWERAGE DISTRICT		DWG NO.		
	CHK REO APVD L			NO. DATE	REVISION	BY APVD	SHEET 78	DATE OCT 87
	PROJECT NO. 96-521			NO. DATE	REVISION	BY APVD	NORTH SHORE 9/10 COLLECTOR MIS SIPHON MAINTENANCE STRUCTURE DC-7-4 AT N. BROADWAY SECTIONS AND DETAILS	PROJ ID C96-521
	MICROFILMED REC 1991			NO. DATE	REVISION	BY APVD	SECTIONS AND DETAILS	FILE 88-544

C96 Q 11 @ 21



Attachment 3
Boring Log of W-20S/I
with Zone of LNAPL

Facility/Project Name: Wisconsin Gas Company - Third Ward License/Permit/Monitoring Number: _____ Boring Number: W-201

Boring Drilled By (Firm name and name of crew chief): WTD Environmental Drilling - Kale Bittner Date Drilling Started: 09/15/92 Date Drilling Completed: 09/17/92 Drilling Method: HSA/Mud Rotary

DNR Facility Well No.: _____ WI Unique Well No.: _____ Common Well Name: W-201 Final Static Water Level: 579.60 Feet MSL Surface Elevation: 585.68 Feet MSL Borehole Diameter: 12/6 inches

Boring Location: State Plane _____ N, _____ E S/C/N Lat: _____ Local Grid Location (If applicable): N E
NW 1/4 of NW 1/4 of Section 33, T 7 N, R 22 @W Long: _____ 4778.18 Feet S 474.20 Feet W

County: Milwaukee DNR County Code: 41 Civil Town (City) or Village: Milwaukee

Sample Number and Type	Length Att. & Recovered (m)	Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					ROD/ Comments	
									Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200		
			1	Asphalt underlain by granite cobbles											Flush-grade protective casing
WGW-201 (3-5) [SS]	24/13	60/42 21/16	3-4	SILTY SAND - coarse, trace wood and coal, dark brown (10YR 3/2), moist, slight petroleum-like odor [Fill]	SM			0							[SS] = 3 in diameter split spoon
WGW-201 (5-7) [SS]	24/5	11/12 23/60	5-6	SILTY SAND - coarse, trace gravel, trace shells, dark brown (10YR 2/1), moist, petroleum-like odor	SM			15							
WGW-201 (7-9) [SS]	24/15	30/37 31/16	7-8	SILTY SAND - coarse, some gravel, little ash, dark brown (10YR 2/1), wet, moderate tar-like odor, sheen	SM			18							Zone of LNAPL
WGW-201 (9-11) [SS]	24/12	25/31 32/41	9-10	SILT - trace gravel, black (7.5 YR 3/6), wet, moderate tar-like odor, sheen	ML			8							
WGW-201 (11-13) [SS]	24/16	21/20 18/18	11-12	SILTY SAND - fine to coarse, trace gravel, dark gray (7.5 YR 3/6), wet, tar-like odor, sheen	SM			7							

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature: [Signature] Firm: Remediation Technologies, Inc.

This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$5,000 for each violation. Fined not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats.

Facility/Project Name <i>Wisconsin Gas Company - Third Ward</i>		License/Permit/Monitoring Number		Boring Number <i>W-205</i>	
Boring Drilled By (Firm name and name of crew chief) <i>WTD Environmental Drilling - Kate Bittner</i>		Date Drilling Started <i>09/17/92</i> MM DD YY		Date Drilling Completed <i>09/17/92</i> MM DD YY	
DNR Facility Well No. / WI Unique Well No.		Common Well Name <i>W-205I</i>		Final Static Water Level <i>580.37</i> Feet MSL	
		Surface Elevation <i>585.61</i> Feet MSL		Borehole Diameter <i>8</i> inches	
Boring Location State Plane _____ N, _____ E S/C/N		Lat. _____		Local Grid Location (If applicable) <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> E	
<i>NW 1/4 of NW 1/4 of Section 33, T 7 N, R 22 (E/W)</i>		Long _____		<i>4778.53</i> Feet <input type="checkbox"/> S <i>4745.58</i> Feet <input type="checkbox"/> W	
County <i>Milwaukee</i>		DNR County Code <i>4-1</i>		Civil Town/City or Village <i>Milwaukee</i>	

Sample Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth in Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Soil Properties					RQD/ Comments
									Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	
			2	- Blind drill See boring log for 20I for lithology - No samples collected End of boring 15.5 feet										Flush-grade Protective Casing
			4											
			6											
			8											
			10											
			12											
			14											
			16											
			18											
			20											
			22											
			24											

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature *[Signature]* Firm *Remediation Technologies, Inc.*

This form is authorized by Chapters 144.147 and 162, Wis. Stats. Completion of this report is mandatory. Penalties: Forfeit not less than \$10 nor more than \$5,000 for each violation. Fined not less than \$10 or more than \$100 or imprisoned not less than 30 days, or both for each violation. Each day of continued violation is a separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats.

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name
Dombrowski	Frank	J	WEC Business Services/We Energies
Mailing Address			City
333 W. Everett Street			Milwaukee
			State
			WI
			ZIP Code
			53203
Phone # (include area code)	Fax # (include area code)	Email	
(414) 221-2156		frank.dombrowski@wecenergygroup.com	

The requester listed above: (select all that apply)

- Is currently the owner
- Is considering selling the Property
- Is renting or leasing the Property
- Is considering acquiring the Property
- Is a lender with a mortgagee interest in the Property
- Other. Explain the status of the Property with respect to the applicant:

Requesting review of the NR 716 Site Investigation Work Plan for Former Third Ward MGP Site

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name
Dombrowski	Frank	J	WEC Business Services/We Energies
Mailing Address			City
333 W. Everett Street			Milwaukee
			State
			WI
			ZIP Code
			53203
Phone # (include area code)	Fax # (include area code)	Email	
(414) 221-2156		rank.dombrowski@wecenergygroup.com	

Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name
Zimdars	Julie	A	OBG, Part of Ramboll
Mailing Address			City
234 W. Florida Street, Fifth Floor			Milwaukee
			State
			WI
			ZIP Code
			53204
Phone # (include area code)	Fax # (include area code)	Email	
(414) 837-3564		julie.zimdars@obg.com	

Property Owner (if different from requester)

Contact Last Name	First	MI	Organization/ Business Name
Various			
Mailing Address			City
			State
			ZIP Code
Phone # (include area code)	Fax # (include area code)	Email	

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 2. Property Information

Property Name Former Third Ward MGP Site		FID No. (if known)	
BRRTS No. (if known) 02-41-000320 primary, various		Parcel Identification Number	
Street Address		City Milwaukee	State ZIP Code WI 53202
County Milwaukee	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels	Property Size Acres

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason: _____

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292. 21(1)(c)2.,h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

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Section 4. Request for Liability Clarification (cont.)

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the Property and the person who will lease the Property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
- (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
- (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

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Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

Phase I Environmental Site Assessment Report - Date: _____

Phase II Environmental Site Assessment Report - Date: _____

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: _____

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): _____

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:
dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.


Section 7. Certification by the Person who completed this form

I am the person submitting this request (requester)

I prepared this request for: Frank Dombrowski

Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Signature 

Date Signed 5/8/19

Title Senior Managing Engineer, O&G Part of
Ramboll

Telephone Number (include area code) 414-837-3564

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

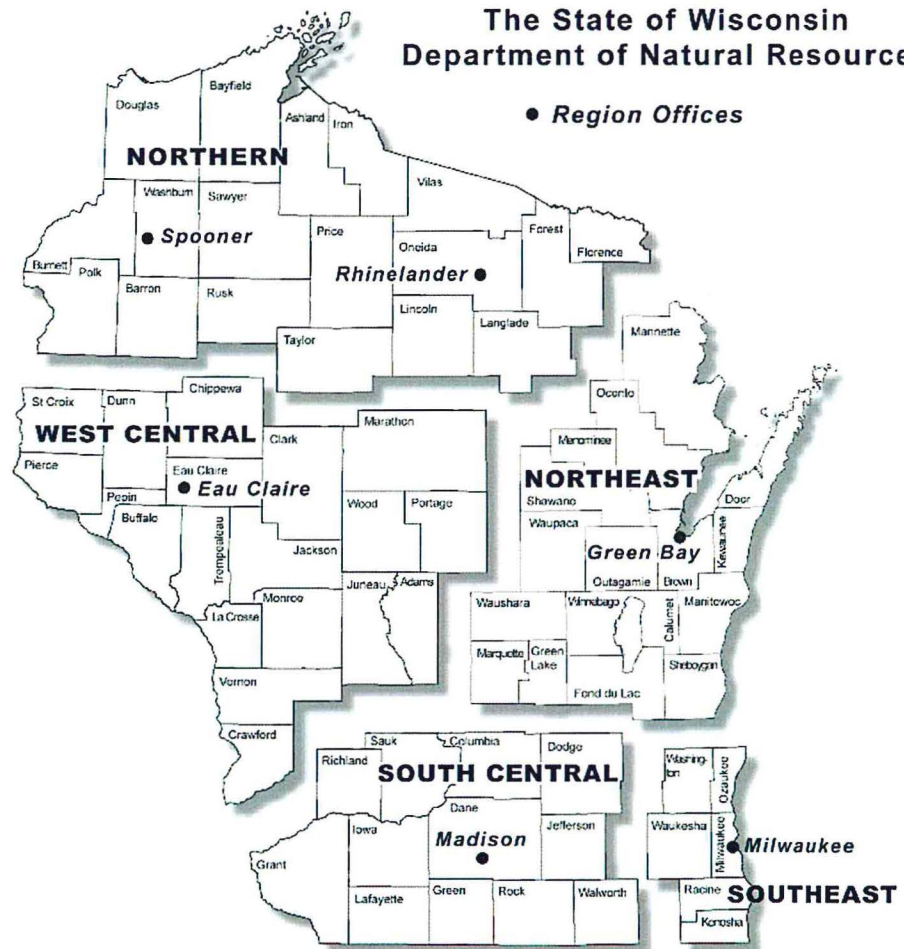
DNR NORTHERN REGION
Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION
Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION
Attn: RR Program Assistant
Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee WI 53212

DNR WEST CENTRAL REGION
Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		