

July 29, 2019

Mr. Frank Dombrowski
We Energies
231 W. Michigan Street
Milwaukee, WI 53203

Subject: Review of *NR 716 Site Investigation Work Plan*
3rd Ward Manufactured Gas Plant (MGP) Site, Milwaukee, WI

- o Peters Johnson, BRRTS #: 02-41-000320, FID #: 241496530
- o City of Milwaukee, BRRTS #: 02-41-557054, FID #: 241887250
- o Hoffman, BRRTS #: 02-41-557057, FID #: 241267950
- o One Catalano Square, BRRTS #: 02-41-577202, FID #: 241038380
- o Rexnord, BRRTS #: 02-41-557059, FID #: 341203720 (closed activity)
- o We Energies Triangle Property, BRRTS #: 02-41-557060, FID #: 341203830 (closed activity)

Dear Mr. Dombrowski:

On May 31, 2019, the Wisconsin Department of Natural Resources (DNR) received a Technical Assistance Request Form 4400-237 with a fee for review of the *NR 716 Site Investigation Work Plan* (the SIWP) prepared by your consultant, O'Brien and Gere Engineers, Inc. (OBG), on your behalf, for the 3rd Ward Manufactured Gas Plant site (the Site) which includes the BRRTS activities listed above.

Background

- In 2015, the DNR issued a case closure denial letter for the Site to We Energies.
- In 2017, the DNR approved a site investigation work plan and the site investigation report for the One Catalano Square property, BRRTS #: 02-41-577202.
- In 2017 and 2018, in response to case closure requests for individual activities at the Site, the DNR issued case closure letters for the Rexnord and for the We Energies Triangle properties, BRRTS #: 02-41-557059, and BRRTS #: 02-41-557060 respectively.
- In September of 2018 We Energies' consultant submitted a technical assistance request for a written response from the DNR to (a) We Energies response report to the 2015 case closure denial letter, and (b) to the overall completeness of the site investigation.
- In November of 2018, the DNR responded with a letter asking We Energies so submit (a) a site investigation work plan to address data gaps, and (b) an updated conceptual site model (CSM) that would better explain the presence of coal tar in the river near the Site.

Proposed Work Summary

An updated conceptual site model is included in the SIWP. In addition to the new CSM, the SIWP proposes the following activities to investigate the extent of contamination:

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- Install two well nests and a soil boring between the Site and the river to investigate groundwater contamination and to investigate possible NAPL migration, or lack thereof.
- Install two piezometers on the east side of the Site screened at the 'intermediate' depth to investigate groundwater contamination to the east.
- Prepare a proposal for soil gas vapor probe sampling near the Marine Terminal Building, if needed, depending on the results of the shallow groundwater chemistry in the proposed wells.

DNR Review of the SIWP

The DNR has reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements will be met with the addition of the following comments:

1. Evaluation of environmental media affected or potentially affected by the contamination

Per Wis. Admin. Code § NR 716.07(4), all environmental media affected or potentially affected by the contamination must be evaluated.

- a. Determine if the current storm sewer that penetrates the sea wall could act as a conduit for MGP residuals, including coal tar and related groundwater contamination to enter the river.

2. Potential or known impacts to receptors

Per Wis. Admin. Code § NR 716.07(7), potential or known impacts to receptors must be evaluated, including on-site and nearby potable wells, buildings, and utilities.

- a. Determine if contaminated groundwater is in contact with the building foundations at Patsy & Paul, One Warehouse, and the Glorioso's Warehouse buildings. This will determine whether further vapor intrusion assessment is necessary at these locations.

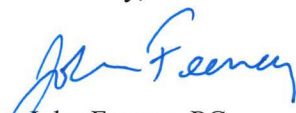
3. Visual aids

Per Wis. Admin. Code § NR 716.15(4), the site investigation report must include tables and figures to clarify and support results and interpretations.

- a. Indicate and describe on your site detail map, the length along the river that the current sea wall penetrates the basal clay near the site, and its condition along that length.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-893-8523 or johnm.feeney@wisconsin.gov.

Sincerely,



John Feeney, PG

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3rd Ward MGP

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Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

cc: Ms. Julie Zimdars, Mr. Graham Fazio, OBG (electronic)
SER File