



June 23, 2014

Mr. Al Mattacotti  
Milwaukee Plating Company  
1434 N. 4th St.  
Milwaukee, WI 53212-3888

SUBJECT: Case Closure Denial – Off-site Vapor Assessment Required  
Milwaukee Plating Co., 1434 N. 4th St., Milwaukee  
DNR BRRTS # 02-41-000825 and 03-41-000762 PECFA # 53212-3888-34-A  
FID # 241036840

Dear Mr. Mattacotti:

On June 5, 2014, the Wisconsin Department of Natural Resources (DNR) Southeast Region Closure Committee reviewed your request for closure of the cases described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of your closure request, the closure committee has denied closure because additional requirements must be met. The purpose of this letter is to inform you of the remaining requirements for obtaining closure, and to request your written response within 60 days of receiving this letter.

Additional site work is necessary at the above described site in order to meet the requirements for site closure. Your site was denied closure because the risk for migration of vapors from this property to the adjacent property to the south must be assessed. Very high concentrations of chlorinated compounds were detected in soil and vapor samples collected less than 60 feet from the building to the south, identified on the City of Milwaukee property database as 1422 North 4<sup>th</sup> Street, owned by Wisconsin Arts Lab, LLC.

No additional groundwater monitoring is required at this time, although none of the monitoring wells should be abandoned until approved by the DNR. The need for groundwater monitoring should be evaluated when additional data is being evaluated.

#### **Need to Complete a Vapor Investigation**

Additional site investigation is needed to determine whether vapor intrusion is a completed pathway at the property identified as 1422 North 4<sup>th</sup> Street, or if there is a risk of future exposure due to residual contamination. The vapor assessment should follow the guidelines outlined in DNR publication RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, December 2010 (updated July 2012), which is available online at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>. It is important that quality control methods are used when collecting samples and then described when reporting the results. For more information and resources regarding vapor intrusion and why it is important that it be addressed, visit the DNR website at: <http://dnr.wi.gov/topic/brownfields/vapor.html>.

It is recognized that there has been minimal investigation beneath the Milwaukee Plating building, particularly to the west of the known contaminant sources. Collecting additional vapor and soil data

along the southern portion of the Milwaukee Plating building at the same time that you collect data off-site would be prudent to support a request for case closure in the future.

Submit a report of the results, with recommendations for additional activities, or if appropriate, a complete closure request, when all the above requirements have been satisfied, together with any required documentation, to let me know that applicable requirements have been met. Case closure can only be considered when the off-site impacts from this site are defined, and mitigated, if applicable.

**Please respond in writing, within 60 days of the date of this letter, with a schedule of your plans to meet these requirements. Until requirements have been met, your site will remain "open" and you will also need to continue to submit the semi-annual progress reports, as required by s. NR 724.13 (3), Wis. Adm. Code.**

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (414) 263-8757.

Sincerely,



Linda M. Michalets  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Ms. Laura Payne, CB&I