State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Milwaukee WI 53233

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November 5, 2021

CERTIFIED MAIL

Mr. A. H. Mattacotti
Milwaukee Plating Company
1434 N. Vel R. Phillips Ave.
Milwaukee, WI 53212-3888

SUBJECT: Status Update Request
Milwaukee Plating Co., 1434 N. Vel R. Phillips Ave., Milwaukee, WI
DNR BRRTS #02-41-000826, FID #241036840

Dear Mr. Mattacotti:

On December 28, 1989, the Wisconsin Department of Natural Resources (DNR) received notification of a hazardous substance discharge at the above-referenced site. The Milwaukee Plating Company (MPC) was identified as the landowner in possession or control of the hazardous substance discharge (hereafter referred to as "contamination") at this site. The term "site" includes the property where the contamination occurred and any other property it has migrated to, pursuant to Wisconsin Administrative Code (Wis. Admin. Code) § NR 700.03(56). As the responsible party for this property, MPC has certain legal responsibilities, as outlined below.

Legal Responsibilities

Persons meeting the definition of "responsible party" under Wis. Admin. Code § NR 700.03(51) shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state. Wisconsin Statute (Wis. Stat.) ch. 292 and Wis. Admin. Code chs. NR 700 through NR 754 provide specific requirements for undertaking appropriate response actions to address contamination, including requirements for emergency and interim actions, public information, site investigations, remedy selection, design and operation of remedial action systems, and case closure.

Our files indicate that we have not received information concerning your efforts to complete the investigation of the discharge of chlorinated volatile organic compounds (CVOCs), particularly trichloroethylene (TCE), since closure of this case was requested and subsequently not approved by the DNR in a letter dated June 23, 2014. In an email dated June 11, 2021, your previous consultant, The OS Group, informed the DNR that they were preparing a scope of work to proceed with the vapor investigation. To-date, no additional information has been received. The DNR requests that the following information be submitted **by December 8, 2021**:

1.) A written status update including hiring an environmental consultant.
2.) A work plan for completing the investigation of vapors on and off-site. In addition, per the letter to MPC dated August 17, 2020, the site investigation scoping and work plan should include an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the site (Wis. Admin. Code § NR

716.07 and Wis. Admin. Code § NR 716.09). The evaluation should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS-containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded.

Contamination Investigation Required

As outlined in the June 23, 2014 letter, MPC must conduct vapor sampling, and soil and groundwater sampling, if needed, to define the extent of TCE and other CVOC contamination originating from your property. The DNR has received vapor data collected in 2021 from the building directly south of MPC, at 1422 N. Vel R. Phillips Avenue (1422 building), that documents high concentrations of TCE in indoor and outdoor air. The table of vapor sampling results collected by LF Green is attached.

Data collected at the 1422 building indicates that MPC is, at a minimum, a contributing source of TCE vapors detected in this building. The DNR has concluded this based on the following: (1) MPC had a known discharge of TCE in the southeast corner of their building, with 2,800,000 parts per billion TCE detected in soil at B-16, approximately 50 feet from the 1422 building; (2) TCE was detected in indoor air and in an outdoor air sample collected in the alley between MPC and the 1422 building in 2021; and (3) MPC has a long-standing air permit for TCE emissions. The TCE migration pathway is currently unknown. The DNR's *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors* (RR-649) describes methods that should be used to assess and investigate utility corridors and other human-made preferential pathways. This and other vapor guidance are available on the DNR's website, by searching on the publication number or "vapor intrusion".

As the responsible party for this hazardous substance discharge, MPC has a legal responsibility under Wis. Stat. § 292.11 to investigate and clean up contamination resulting from the hazardous substance discharge. The DNR will work with you to move this site towards closure; however, this is the second request the DNR has made for information. If the above-requested information is not received **by December 8, 2021**, the DNR may initiate enforcement action against you for your failure to comply with Wis. Stat. ch. 292.

The DNR appreciates your cooperation and looks forward to an update regarding this site. If you have any questions or would like to discuss anything in this letter, please contact me, the DNR Project Manager, at 414-435-8010, or at linda.michalets@wisconsin.gov.

Sincerely,

Linda Michalets
Hydrogeologist
Remediation and Redevelopment Program

Attachment

cc: Steven Osesek, The OS Group LLC (steve.osesek@theosgrp.com)

Table 1 Indoor Air Analytical Data Summary
1422 N Vel R Phillips Avenue
Milwaukee, WI

Laboratory ID	21050480-001A	21050480-002A	21060498-001	21060498-002	21060498-003	21090336-001	21090336-002	21090336-003	21090336-004	**Non-Residential Vapor Action Level Indoor Air[1]**	*Residential Vapor Action Level Indoor Air[1]*
Sample ID	60341- 1st Floor	60322- Basement	6-11-21 VP-1	6-11-21 VP-2	6-11-21 VP-3	60295	60288	60287	60348		
Location	First Floor	Basement	Basement	First Floor	Second Floor	Basement	First Floor	Second Floor	Outdoor Air		
Date Collected	5/15/2021 1:07 PM	5/15/2021 1:13 PM	06/11/2021 13:40	06/11/2021 13:45	06/11/2021 13:50	09/09/2021 09:50	09/09/2021 09:40	09/09/2021 09:30	09/09/2021 10:00		
Analyte											
1,1,1-Trichloroethane	< 1.6	< 1.8	< 2.1	< 2.1	< 1.8	< 3.8	< 4.7	< 3.6	< 3.2	22,000	5,200
1,1,2,2-Tetrachloroethane	< 2.1	< 2.2	10	< 2.7	< 2.3	< 4.8	< 6.0	< 4.6	< 4.1	2.1	0.48
1,2,4-Trimethylbenzene	< 1.5	< 1.6	2.3	< 1.9	< 1.6	< 3.4	< 4.3	< 3.3	< 2.9	260	63
2-Butanone (MEK)	< 2.2	< 2.4	4.8	4.3	4.3	5.8	< 6.4	< 4.9	< 4.4	22,000	5,200
Acetone	11	21	72	46	45	75	27	27	< 14	140,000	32,000
Carbon disulfide	< 0.94	1.6	< 1.2	< 1.2	1.9	4.6	< 2.7	< 2.1	< 1.8	3,100	730
Chloromethane	< 1.6	< 1.7	7.5	9.8	13	< 3.6	< 4.5	< 3.4	< 3.1	390	94
Dichlorodifluormethane	2.5	2.2	2.3	2.9	2.6	4.7	5.6	< 3.3	< 2.9	440	100
Ethyl Acetate	< 2.7	4.2	22	4.2	*120*	*83*	< 7.8	< 6.0	< 5.3	310	73
n-Heptane	< 1.2	< 1.3	2.3	< 1.6	< 1.4	3.1	< 3.6	< 2.7	< 2.4	1,800	420
Isopropyl Alcohol	3.7	5.4	5.4	5.3	4.2	55	< 11	< 8.2	< 7.3	876	209
m&p-Xylene	< 2.6	4.5	4.0	< 3.4	< 2.9	< 6.1	< 7.5	< 5.8	< 5.2	440	100
Methylene Chloride	< 10	59	< 13	< 13	< 12	< 24	< 30	< 23	< 21	2,600	630
Naphthalene	*1.8*	< 1.7	*2.8*	*2.1*	*3.3*	**4.2**	< 4.6	< 3.5	< 3.1	3.6	0.83
o-Xylene	< 1.3	1.4	< 1.7	< 1.7	< 1.4	< 3.0	< 3.8	< 2.9	< 2.6	440	100
Tetrachloroethene (PCE)	< 2.0	7.8	< 2.6	< 2.6	< 2.3	< 4.7	< 5.9	< 4.5	< 4.0	180	42
Toluene	< 1.1	2.7	7.3	3.8	4.7	21	5.6	3.5	3.7	22,000	5,200
Trichloroethene (TCE)	1.6	**12**	**36**	**17**	**11**	**180**	**31**	**25**	**45**	8.8	2.1
Xylenes, Total	< 3.9	5.8	< 5.0	< 5.0	< 4.3	< 9.1	< 11	< 8.7	< 7.7	440	100

Notes:
- - : No Standard Established
Results are shown in ug/m3 = micrograms per cubic meter
Sample results in excess of Large Commercial/Industrial Building VRSLs are shown in **bold font.**
(1) Vapor Action Levels (VAL) are based on a hazard index of 1 or a life-time excess cancer risk of 10^{-5}, per WDNR Pub-RR-800 .
WDNR Quick-Look-up Table, from the EPA RSL calculator, updated November 2017
BOLD: Exceeds Vapor Action Level for Small Commercial Buildings
Italics: Exceeds Vapor Action Level for Residential Buildings
Several VOCs not detected are not included in this summary for brevity