



March 10, 2020

Mathew Reimer
Redevelopment Authority of the City of Milwaukee
809 North Broadway
Milwaukee, WI 53202

Subject: Request for Additional Information
Try-Chem Corp., 1333 W. Pierce St., Milwaukee, WI 53204
DNR BRRTS # 02-41-409441, FID # 241078530

Dear Mr. Reimer:

On January 9, 2020, the Wisconsin Department of Natural Resources (DNR) reviewed the closure request for the case identified above. The closure request was prepared and submitted by The Sigma Group (Sigma) on behalf of the Redevelopment Authority of the City of Milwaukee. The DNR reviews environmental remediation cases for compliance with applicable local, state and federal laws. The following actions are required prior to the DNR granting you case closure in compliance with Wis. Stat. ch. 292 and Wis. Adm. Code chs. NR 700-754. Upon completion of these actions, your closure request will be reconsidered.

Background

From 1916 to 1985 the site was utilized for metal treating operations including electroplating, paint stripping, and painting. The site buildings were razed in 1995 and the foundations and other improvements were removed in 2009. The site is currently vacant. Poor waste management practices at the site are well documented. Waste management practices included waste burial and the unlicensed acceptance of waste from other facilities. The United States Environmental Protection Agency completed a removal of hazardous waste in 1988. Site investigation activities have identified the presence of polycyclic aromatic hydrocarbons (PAHs), metals, volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs) in the groundwater and/or soil at the site.

Request for Additional Information

As noted above, additional work is necessary to meet the requirements for case closure because the site investigation is incomplete and revisions to the case closure request are needed. Additional assessment and potential sampling are needed to define the degree and extent of contamination per Wis. Admin. Code § NR 716.11.

Per- and Polyfluoroalkyl Substances (PFAS)

The DNR has identified the site as a potential source for per- and polyfluoroalkyl substances (PFAS). The DNR believes this emerging contaminant may be present in soil and groundwater on the site. The DNR has regulatory authority to ask responsible parties to evaluate hazardous substance discharges and environmental pollution including emerging contaminants.

As stated above, metal treating operations, including metal plating, occurred on-site from 1916 to 1985. Chromium metal plating is documented to have occurred at the site. The use of PFAS is associated with chromium metal plating operations in Wisconsin and throughout the United States. This site may be a source of PFAS contamination.

The information previously provided for this facility indicates there was a discharge from chromium metal plating

activities which are historically linked to PFAS use. Site investigation scoping (Wis. Admin. Code § NR 716.07) and the site investigation work plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges of hazardous substances.

In accordance with Wis. Admin. Code § NR 716.09, the DNR requires that you submit a site investigation work plan that includes an assessment of PFAS, and per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated. As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, the work plan should include a written evaluation of potential PFAS compounds that, were historically produced, used, handled, or stored at the site. The evaluation should include any available information regarding whether any products containing PFAS were used in any process services, the duration of PFAS use, the type of PFAS used, and any areas of the site where PFAS may have been used, stored, or discarded. The site investigation work plan shall follow Wis. Admin. Code § NR 716.09. If sampling for PFAS is deemed necessary, the work plan shall include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07.

Hexavalent Chromium

A Phase I Environmental Assessment Report prepared by the DNR, dated August 1996, indicates that hexavalent chromium was used at the site. In addition, information previously provided for this facility indicates there was a discharge from chromium metal plating activities which are historically linked to hexavalent chromium use. Site investigation scoping and the site investigation work plan require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges of hazardous substances.

In accordance with Wis. Admin. Code § NR 716.09, the DNR requires that you submit a site investigation work plan that includes an assessment of hexavalent chromium, and per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated. As stipulated in Wis. Admin. Code §§ NR 716.07, NR 716.09, the work plan should include a written evaluation detailing available information on the duration of hexavalent chromium use and any areas of the site where hexavalent chromium may have been used, stored, or discarded. The site investigation work plan shall follow Wis. Admin. Code § NR 716.09. If sampling for hexavalent chromium is deemed necessary, the work plan shall include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07.

Documentation

The following information is necessary to meet the case closure requirements of Wis. Admin Code. ch. NR 726.

- Provide a revised detailed site map which includes the potential sources of contamination formerly located at the site. Include pits, drywells, known dumping locations, USTs, ASTs, vats, transformers, locations of former metal treating operations, etc.
- The figure titled "Cap Location Map" (Figure D.2) in the case closure submittal is inconsistent with design sheets C100 and C300 contained in the *Construction Documentation Report*, prepared by Sigma, dated January 21, 2020. Specifically, Figure D.2 identifies an elevated area in the southwest corner of the site near the former transformer as "Engineered Greenspace Cap;" whereas the design sheets indicate that a clay cap was not placed in this area. Determine the current surface cover in this area and determine whether the current surface cover is an acceptable remedy to address the direct contact exposure pathway in this area. Revise Figure D.2 as necessary.
- Remove saturated samples from the residual soil table (Table A.3).
- Revise all appropriate figures to reflect the conceptual site model (CSM) of sitewide PAH and metal contamination in soil.

- Revise Figures B.2.a.1 and B.2.b.1 to include the extent of VOC contamination identified in the ROW (SB-17) and remove the circles around SU-6, MW-10, and MW4/4R. Also revise Figure B.3.a.2 to reflect these changes.
- The vinyl chloride groundwater plume appears to be more expansive than is represented on Figure B.3.b. Expand the extent of vinyl chloride groundwater contamination greater than the enforcement standard to include MW-2A, MW3, and MW4/4R. Also, send a revised notification of continuing obligations and residual contamination to the ROW which includes a notification of groundwater contamination. Revise Table 5 of the Case Closure Form (Form 4400-202) to reflect this continuing obligation.
- Provide a groundwater iso-concentration figure which illustrates the extent of metal contamination in groundwater.
- Provide cross-sections which include the degree and extent of groundwater contamination.
- Discuss the source of contamination at W-07 and determine whether a notification of residual contamination to the eastern adjacent property, 1241 W. Pierce St., Milwaukee, is necessary.
- If not done previously, request access to 1411 W. Pierce St., Milwaukee, in order to locate MW-1A and determine if this well was abandoned or has been lost. If MW-1A cannot be located, describe attempts to locate the well and notify the property owner of their continuing obligation due to this lost well. Also revise Table G to reflect this continuing obligation if necessary.
- On Table 5 of the Case Closure Form (Form 4400-202), uncheck box viii in the ROW column which states “residual soil contamination meets NR720 industrial soil RCLs, land use is classified as industrial.”
- On the Case Closure Form (Form 4400-202), revise the response to question 3.B.ii. to be consistent with the response to question 4.G.

Schedule

In accordance with Wis. Admin Code § NR 716.09(1), the DNR requests that you submit a work plan to evaluate potential PFAS and hexavalent chromium contamination at the site within 60 days of the date of this letter, by May 9, 2020.

Until requirements are met, your site will remain “open” and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. You are also responsible for any operation and maintenance activities required under Wis. Admin. Code § NR 724.13. Once the additional work has been completed, documentation should be submitted to the DNR to demonstrate that the applicable requirements have been met, per the timelines above.

Conclusion

If you have any questions regarding the information in this letter, please contact the DNR Project Manager, Joseph Martinez, at 414-263-8705 or by email at joseph.martinez@wisconsin.gov.

The DNR appreciates your efforts to restore the environment at this site.

Sincerely,



Joseph J. Martinez
Hydrogeologist, Southeast Region
Remediation & Redevelopment Program

cc: Steven Kikkert, The Sigma Group – e-copy
Mafiul Islam, The Sigma Group – e-copy