

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
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Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
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September 18, 2015

Ms. Kay Grosinske
USAF Civil Engineer Center
2261 Hughes Avenue, Suite 155
Lackland AFB, TX 78236-9821

Subject: Denial of Post Closure Modification
POL/Dry Well Area (IRP Site ST-10), 300 E. College Ave., Milwaukee, WI 53207
DNR BRRTS Activity # 02-41-521007
DNR FID #: 241176980

Dear Ms. Grosinske:

On February 2, 2004, the Department of Natural Resources (DNR) closed the above site. Soil contamination remained on the site at concentrations that exceeded applicable soil standards and was included on the DNR GIS Registry.

On September 9, 2015, AECOM requested on your behalf that this site be removed from the GIS Registry as soil contamination no longer exceeds applicable standards. Certain indicators of soil contamination, such as Total Petroleum Hydrocarbons (TPH), no longer have specific standards established by the DNR for comparison. Where current standards do apply, analytical data obtained after the site was closed was compared to NR 720 Residual Contaminant Levels (RCLs) to show that residual contamination does not exceed these standards. Contaminant concentrations do not exceed direct contact RCLs. Concentrations of some petroleum compounds do exceed the RCLs for the protection of groundwater.

As contaminated groundwater has not been identified at this site, AECOM has suggested that the protection of groundwater RCLs do not apply and that this site does not need to be included on the Registry. However, according to s. NR 726.07(1), Wis. Adm. Code, if soil contaminant concentrations meet or exceed an RCL, the site will need to be placed on the GIS Registry. An exception is not provided for properties where an RCL for the protection of groundwater is exceeded and groundwater contamination has not been identified. The DNR still considers soil contamination to be present on this site and it must remain on the Registry. Inclusion on the Registry serves to notify future property owners of residual contamination to ensure that impacted soils are properly managed if they are excavated in the future.

We appreciate your continued efforts to ensure that conditions at this site will remain protective. If you have any questions regarding this letter, please contact me at (414) 263-8541 or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Tim Mueller, AECOM, 1555 N. Rivercenter Drive, Suite 214, Milwaukee, WI 53212