



March 11, 2022

Mr. Patrick Schloss
City of West Allis
Economic Development
7525 W Greenfield Ave.
West Allis, WI 53214

Mr. Bob Monnat
The Mandel Group
330 E Kilbourn Ave
Suite 600 South
Milwaukee, WI 53202

Subject: Review of Remedial Action Options Report – Material Management Plan
700 Series Properties (Parcel 705)
DNR BRRTS Activity #: 02-41-544080; FID #: 341117040

Dear Mr. Schloss & Mr. Monnat:

On November 29, 2021, the Department of Natural Resources (DNR) received the *Remedial Action Plan for the SoNa Property* (RAOR) prepared for the 700 Series Properties (Parcel 705) site (Site). The RAOR provided information on past site investigation and material management activities conducted by your consultant, Friess Environmental Consulting, Inc (Friess), and other consulting firms. TEMCO collected soil and groundwater samples during environmental assessments conducted between 2005 and 2012. A remedial excavation of petroleum contaminated soil conducted in 2005. Multiple proposals to reuse excavated contaminated soil and other solid waste on this site have been submitted to the DNR; not all the proposed activities were approved by the Department or were completed as proposed:

- December 7, 2005, Remedial Action Plan approved, partial excavation and grading completed abandoned mid-project.
- May 2, 2006, request for soil movement to Lime Pit Property 02-41-184802 – unfulfilled.
- March 2010 e-mail (from TEMCO) stating that 12,500 tons of petroleum contaminated soils from the northwestern portions of 705, 701, and 709 had been removed.
- Receipt of 4,000 – 6,000 cubic yards of material from the adjoining former Pressed Steel site 02-41-385114. The approved soil management plan was for 2,500 cubic yards to remain on the receiving property.

The RAOR proposed reusing excavated contaminated soil onsite and maintaining a barrier over the property to prevent contact with residual contamination. The DNR reviewed the request and found it to be incomplete. Additional information explaining how material proposed to be excavated has been characterized and how it will be managed must be provided. The Department will re-evaluate the RAOR/MMP once the following issues and questions are addressed:

- The DNR is unsure that the extent of the contaminated fill and soil has been accurately identified considering past soil management activities and the presence of site-wide fill. Evaluate how soil management may have changed the limits of contamination. Also, whether the sampling conducted accurately evaluated the potential for contaminated fill to be in all areas of the site. Discuss why PAH contamination may only be limited to certain portions of the site.
- Provide an estimate of how many yards of contaminated soil and other solid waste will be reused on site. This is required by NR 718.12(2)(b)2 and will be necessary to determine compliance with NR 718.12(1)(e).
- Between 4,000-6,000 yards of soil was imported from the Pressed Steel site, presumably as an exempt waste as the DNR did not approve the reuse of the material. The RAOR proposes excavating a portion of this soil and managing it on-site and off-site. To confirm that this material will be managed appropriately, provide the sample results and other information that was originally used to characterize the material and explain why it can be managed as an exempt waste. If an exempt waste, it can be managed offsite without DNR approval. If this material is not an exempt waste, and is proposed to be used offsite, the materials management request will need to be updated to reflect this additional reuse property by including the needed fees, signatures from the offsite property owners, etc.
- Providing additional information on cut/fill figure(s) would be useful for demonstrating that sufficient samples were collected from material proposed to be excavated and how material will be reused on the Site. Identify the following on the figure(s):
 - Soil sample locations with sampling data broken down by type, PAH, VOC, etc.
 - Portions of the excavation where VOC contamination is present and the specific areas where this soil is intended to be reused. The DNR may not approve the reuse of VOC-impacted soil.
 - Cut areas where excavated soil would be managed as exempt (if any).
 - Areas where contaminated soil was placed as part of an earlier approval that will be re-excavated.
 - Areas where contaminated soil will be replaced on site.
- Provide cross sections which show the relationships between sampling locations, historic fill, recently imported soil, cut and fill locations, surface features, proposed excavations, and other information useful for demonstrating where contamination will be located before and after excavation.
- Provide a discussion about how the sampling requirements of NR 718.12(1)(e) have been met. Identify soil samples collected from material that will be excavated and reused on site and discuss how the site investigation has characterized the overall condition of the material.
- The maintenance of a cap over contaminated soil will be required as a condition for approving the materials management plan. Confirm that a minimum of 18 inches of clean soil will be used as a barrier in all non-paved areas of the site and explain why the proposed cap thickness will be protective for the intended use of the property. Provide a draft cap maintenance plan for review.

Note: The Site Investigation Report has not been submitted or approved for the Site and the contents of the report would facilitate the review of the RAOR and are required per NR 700 series.

The DNR will review the additional information provided and either approve the RAOR or outline next steps for obtaining approval. We appreciate your efforts to protect the environment at this Site. If you have any questions regarding this request, please contact me by calling (414) 405-1203, or by email at Greg.Michael@wisconsin.gov.

Sincerely,

A handwritten signature in black ink that reads "Greg Michael". The signature is written in a cursive style with a large initial "G".

Greg Michael
Hydrogeologist
Remediation & Redevelopment Program

cc: Friess Environmental Consulting Inc, Rick Frieseke via e-mail only