



April 4, 2023

Mr. Paul Grittner  
Wisconsin Department of Natural Resources  
1027 West St. Paul Avenue  
Milwaukee, WI 53233

RE: Additional information for the Soil Exemption Approval Request for the SoNa Property (6633-6639 W. National Avenue) Located in West Allis, Wisconsin — FEC Project No. 210807; DNR BRRTS No. 02-41-544080

Dear Mr. Grittner:

A requested, ***Friess Environmental Consulting, Inc. (FEC)*** provides the following information that was requested in your March 22, 2023, email to support our request.

Question 1: An estimate as to the amount of non-exempt, non-soil, solid waste within the stockpile. Describe how much waste material can be observed at the surface of the pile and what was observed in soil samples or cores obtained from the pile.

Response 1: The soils in the stockpile were generated during site grading, construction of the retention pond and excavation for the southern portion of the building. Since the soils have been mixed and reworked, there is no longer a clear definition between soil and historic fill. The sampling was conducted to characterize all materials present in the pile.

Question 2: Recent watertable elevation data from the R&R Quarry site. Also provide an estimate of the elevation that the material will be placed at R&R Quarry to confirm adequate separation between the contaminated soil and the watertable.

Response 2: The groundwater monitoring well was installed in 2012. The casing was extended on two occasions and fill operations were conducted around the well. The well was damaged in 2020. Subsequent sampling indicated sediment in the well and infiltration of surface/storm water. Since the well location conflicted with ongoing filling operations and the well appeared to have been compromised, the well was abandoned in April 2022. Historic groundwater elevations were determined to be at an elevation level less than 810 feet MSL. The soils proposed for placement will be placed along the active working slope ranging in elevation 855 to 835 feet MSL.

Question 3: As stated in the August 17, 2020, letter sent by the DNR, the requirement to evaluate emerging contaminants, including PFAS, applies to all sites that have not received a final case closure letter, regardless of the review stage. Our review of the site file information finds that the site investigation work plan(s) and site investigation report(s) submitted for this site did not include an evaluation of emerging contaminants, including PFAS. Therefore, an evaluation of emerging contaminants consistent with Wis. Admin. Code § NR 716.07 must be provided for this site. This assessment should be completed before contaminated soil is removed from the site to ensure that it has been properly characterized.

Response 3: Please find attached the evaluation of emerging contaminants, including PFAS, for the site.

Question 4: An assessment as to whether soil in the stockpile includes VOC-impacted soil identified at sample locations E1, EX3, EX8, SP-19, SP-22, SP-24, and GP-25. These sample locations appear to be located within or near cut areas.

Response 4: The soil samples from E1, EX3, EX8, and GP-25 that exhibited residual VOC impacts were collected at depth (6 to 8 feet bgs) and were not encountered or removed during development activities. The soil samples from SP-19, SP-22, and SP-24 were covered by a stockpile in 2012 and the soils from the stockpile were the actual soils to be cut near those locations. These cut soils were placed in the low area south and east of the new building on the northwestern portion of the site that will be capped as part of the development and managed in accordance with an approved maintenance plan. As such, soils from the areas of SP-19, SP-22, and SP-24 were not excavated or placed in the stockpile proposed for removal (please refer to the cross-sectional diagram attached). In addition, no indications of petroleum impacts were present in the samples collected from the soil stockpile proposed for removal and no VOCs were detected in the soil samples collected from the soil stockpile proposed for removal (S-1 to S-6).

Question 5: The correct fee for the request is \$2,000. Fees are assessed for each site where contaminated material is excavated or managed. The remaining \$1,000 will need to be submitted before a determination can be provided.

Response 5: Please find enclosed a check for the remaining \$1,000.

Based on the results of the analytical testing and the insoluble and immobile nature of the contaminants, the soil impacts present in the soil stockpile are not a

risk to groundwater. We again request that the DNR grant the ch. NR 718.12 exemption approval, as well as an exemption to ch. NR 718.12(1) (c) 6, for the disposal of soil from the proposed development at the R&R Excavating Site.

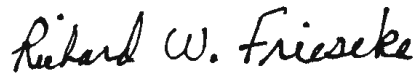
We appreciate your continued assistance with this request. If you have any questions or comments regarding this submittal, please contact us at (414) 228-9815.

Respectfully,

***Friess Environmental Consulting, Inc.***



Trenton J. Ott  
Project Manager



Richard W. Frieseke, P.E.  
President

Attachments

210807 Exemption Additional information

March 27, 2023

Mr. Paul Grittner  
Wisconsin Department of Natural Resources  
1027 West St. Paul Avenue  
Milwaukee, WI 53233

RE: Emerging Contaminants Statement for SoNa Property (6633-6639 W. National Avenue) Located in West Allis, Wisconsin — FEC Project No. 210807; DNR BRRTS No. 02-41-544080 (the “Property”)

Mr. Grittner:

Per the requirements of the Wisconsin DNR, on behalf of SoNa Lofts LLC and Makers Row QOZB LLC, Mandel Group Inc. is providing this statement regarding the potential production, use, handling, storage, management, or disposal of perfluoroalkyl and polyfluoroalkyl substances (PFAS) at or from the Property.

The Property is situated at the southwest corner of the intersection of West National Avenue and South 66<sup>th</sup> Street in the City of West Allis. The Site is approximately 6.53-acres. The site is being developed with a 110-unit apartment complex with underground parking, first floor retail, at grade parking and access drives, outdoor patio and pool, and retail terrace on the SoNa Lofts property. Three other lots are being developed with retail, commercial and additional residential uses.

Numerous environmental site assessments have been conducted on the site. The Property appears to have been developed dating back to at least 1910. Historically the Property has been utilized as a lumber yard, a coal yard, salvage yard, bulk plant, filling station, concrete block factory, steel fabricator, and for grinding and machining. Petroleum impacted soil was removed from a large excavation area in the northwestern portion site in 2005. Historic fill is present across the Property. The fill typically consists of mixtures of clay, silt, and sand, and occasionally includes debris such as brick, concrete, and wood. Slag and cinder-like materials, foundry sand, and fly ash are also present in some locations. The historic fill has been investigated and is being properly managed and capped as part of a remedial action plan previously approved by the DNR.

According to the Interstate Technology Regulatory Council (ITRC), commercial-scale production of PFAS and 1,4-dioxane began in the 1950s. Therefore, historical filling activities prior to 1950 are not considered viable sources of these contaminants.

According to the ITRC, 1,4-dioxane has been used to stabilize chlorinated solvents, particularly 1,1,1-trichloroethane (TCA), since the late 1950s. Current estimates link 90% of 1,4-dioxane usage to 1,1,1-TCA stabilization. No VOCs other than those related to petroleum, were detected as part of the site investigations. Given the absence of evidence of a significant release of 1,1,1-TCA or TCE and the lack of prior uses that give rise to its potential, it is unlikely that a significant release of 1,4-dioxane has occurred on the Property.

According to the ITRC, PFAS-containing aqueous film forming foams (AFFFs) have been in use to fight liquid fuel fires since the 1960s. (PFAS-containing AFFF was commonly used by fire departments since the 1960s). No records from the City of West Allis building inspection department were reviewed that would suggest that a fire requiring the use of AFFF occurred at the Property.

Based on our knowledge and review of the available information including historic Site uses/occupants and potential chlorinated solvent usage, it is our belief that no PFAS containing materials have been produced, used, handled, stored, managed, or disposed of at or from the Property.

We trust that this information is sufficient to support our opinion that further evaluation for potential PFAS at the Property is not warranted.

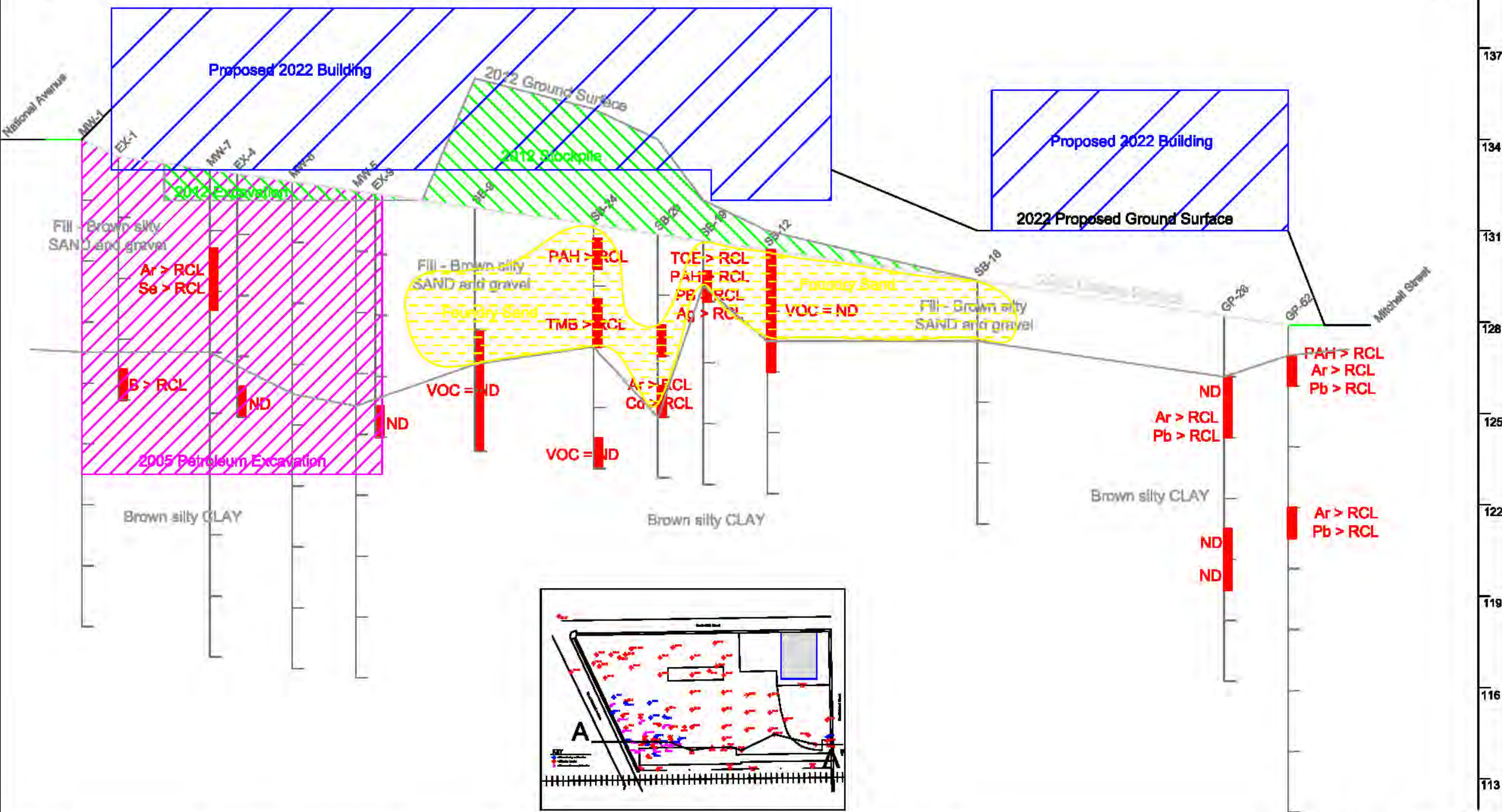
Very Truly Yours,



Robert B. Monnat  
Senior Partner

A

A'



	File No.: 210807
	DWG Date: 5-4-22
	Rev Date:
	Drawn By: TJO
	Checked By (PM): TJO

**Geologic Cross-Section Diagram A-A'**  
 SoNa Property  
 West National Avenue  
 West Allis, Wisconsin

All dimensions on this diagram are approximate

Scale  
 1 inch  
 Vertical Scale - 1" = 3'  
 Horizontal Scale - 1" = 50'