



August 1, 2018

Sister Katherine Chuston
School Sisters of St. Francis
1545 S. Layton Boulevard
Milwaukee, WI 53215

Sister Janet Neureuther
Telos, Inc. & School Sisters of St. Francis
2735 West Greenfield Avenue #305
Milwaukee, WI 53215

Subject: Data Transmittal of Additional Site Investigation Results
Clare Central Apartments, 1003 and 1033 Atkinson Ave, Milwaukee, WI
FID# 341148720, BRRTS# 02-41-549867 & 06-41-560680

Dear Sister Chuston and Sister Neureuther:

On July 10, 2018, the Wisconsin Department of Natural Resources (DNR) reviewed the *Data Transmittal*, dated April 13, 2018 submitted by Terracon Consultants, Inc. (Terracon) for the site described above. In the *Data Transmittal*, Terracon responded to the requested work items in the DNR's December 14, 2016 letter by presenting the new sampling results or by explaining why additional work was not necessary. A site investigation report (SIR) was not prepared, because Terracon wanted to verify that additional information would not be required.

After reviewing the *Data Transmittal*, the DNR has determined that no additional site investigative work is needed at this time, based on the information submitted to date. However, work is still needed regarding the vapor intrusion pathway mitigation. The SIR should be prepared and submitted to the DNR for review. Listed below is additional work to be completed for the vapor intrusion pathway mitigation. These items should be modified or explained in the SIR.

Vapor Intrusion/Mitigation

- In an April 17, 2017 meeting with the DNR, Terracon stated that they were evaluating potential vapor migration in the elevators in the Clare Central Apartments, because trichloroethylene (TCE) in the ambient air sample collected from the mechanical closet on the second floor of the building at 1003 W. Atkinson Avenue in September 2016 was close to the indoor air vapor action level. One suggested solution was to place a blower at the top of the elevator shaft(s) to pull up any vapor that may enter the elevator shaft(s) and vent them to the outside. The DNR discussed this potential mitigation method and contacted Terracon and suggested that a blower at the top of the elevator shaft may cause additional vapor migration from the base of the elevator shaft; therefore, Terracon should evaluate sealing off the base of the elevator shaft. Mitigation of the potential vapor migration pathway due to the elevators must be completed due to TCE vapors still being present on the second floor in both apartment buildings as evidenced by the January 2018 ambient air sampling.

- The DNR recommends that ambient air sampling in the two apartment buildings be completed quarterly until the potential vapor pathway due to the elevators in each apartment building is mitigated. Ambient air sampling is needed to ensure the air doesn't contain contaminants in concentrations exceeding the indoor air vapor action levels. Please continue to follow the sampling procedures used in the last sampling event.
- Due to the on-going vapor intrusion risk to the site buildings, DNR is requiring a plan for additional mitigation measures and ambient air monitoring be submitted within 30 days.
- As requested, Terracon attempted to contact the residents at 3618 N. 11th Street but was unsuccessful. Recently, the DNR checked Milwaukee County's GIS website and found the property at 3618 N. 11th Street is now owned by Wells Fargo. Contact Wells Fargo and inform them that the sub-slab depressurization system (SSDS) in that residence must be inspected to ensure that it is operating properly prior to selling or leasing the property. While the SSDS is operating, the ambient air should be sampled in the residence at 3618 N. 11th Street. As requested in the DNR's December 14, 2016 letter a maintenance plan should be prepared for the SSDS in the residence 3618 N. 11th Street. The SSDS must be inspected on a regular basis and the inspection results must be documented. Until the Clare Central case is closed, inspection of the SSDS at the residence shall be completed by Telos, Inc.

Site Investigation Report

- In the *Data Transmittal*, Terracon's rationale for not completing additional investigation of soil contamination north/northeast of the site is satisfactory; however, the extent of soil contamination illustrated on the soil isoconcentration maps should be extrapolated further into the right-of-way. The contour lines on the soil isoconcentration maps where the extent is extrapolated should be dashed.
- Please include on the appropriate soil isoconcentration maps the depths of soil samples from borings that demonstrate "no detect", so it is evident that the extent of soil contamination is shown on the maps.
- On the soil isoconcentration map for 4-8 feet, Figure 2, remove the soil sample data from borings P-3, P-33 and P-34, which were collected at 9 feet.
- As requested in the DNR's December 14, 2016 letter, clarify whether the storm sewer in the east/west alley immediately south of 1033 W. Atkinson Avenue exists further east of the catch basin noted on the maps. Also determine if there is a storm sewer in the north/south alley between the residences and the 1003 W. Atkinson Avenue apartment building.
- Water, telecommunication and electric utilities that provide service to the Clare Central Apartments are illustrated on the site maps. Please show where the gas and sewer lines enter the Clare Central Apartments' property. Also illustrate any utilities present in Atkinson Avenue.
- Discuss whether the utilities serve as migration pathways for contaminants.
- As part of the evaluation to determine if utilities serve or have served as migration pathways, check records to locate utilities that were present at the time the former manufacturing facility existed. These utilities may have acted as migration pathways at the time the contaminants were released at the site.

- Clarify, on Table 4 and Exhibit 5 from the *Data Transmittal*, where the second recent ambient air sample was collected on the first floor of the apartment building at 1003 W. Atkinson Avenue. Table 4 indicates that the sample was obtained from the kitchen in Unit #1, whereas Exhibit 5 shows the sample was collected in apartment #3, but it is labeled as 1003 Unit #2 Kitchen. The other sample from the first floor of that building was collected from the sump closet.
- Verify where the ambient air samples were collected on the second floor of 1033 W. Atkinson Avenue. Table 4 shows the recent indoor samples were collected in the kitchen of Units #6 & #7 (first floor). Exhibit 6 shows indoor air samples were obtained from Units #5, #7 and #8 (labeled as Unit #6). Table 4 also has the outdoor air sample collected from the porch of Unit #7; however, Exhibit 6 illustrates that outdoor air samples were collected from the porches of Unit #5 & #7. If the sample locations on the exhibits are from more than one sampling event, then specify that is the case.
- Modifications made to Exhibits 5 and 6, should also be made to Exhibits D.1.b and D.1.c in the Vapor Mitigation System Maintenance Plan.

When preparing the SIR it would be appropriate to consider potential remedial action options for the soil and groundwater contamination at the site, due to the continuing vapor intrusion threat to the residences of the Clare Central Apartments. As required under Wis. Admin. Code § NR 726.05(8)(b)1, where vapors are present above of the vapor risk screening levels, a remedial action must be conducted to reduce the mass and concentration of the volatile compounds to the extent practicable.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter or the case, please contact me at the letterhead address, by calling (262) 574-2166, or by e-mail at david.volkert@wisconsin.gov.

Sincerely,



David G. Volkert, P.G.
Hydrogeologist
Bureau for Remediation & Redevelopment

cc: Margaret Kidder - St. Clare Management, Inc.
Don Gallo – Axley Brynelson, LLP
Tim Welch - Terracon
SER File