



December 20, 2021

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: *Review of Remedial Design Report*
Clare Central Apartments, 1003 and 1033 West Atkinson Avenue, Milwaukee, WI
FID #: 341148720, BRRTS #: 02-41-549867 & 06-41-560680

Dear Sisters Chuston & Neureuther:

On September 8, 2021 the Wisconsin Department of Natural Resources (DNR) received a *Remedial Design Report* (RAP) including additional site investigation information, prepared by GZA GeoEnvironmental, Inc. (GZA) for the site identified above. This report was written in response to DNR review comments of a June 28, 2021 *Remedial Action Options Report* and June 11, 2021 *Site Investigation Report* previously submitted to DNR for review and approval.

The site was historically an industrial property where metal plating and fabrication took place prior to the current residential apartments. The site investigation indicated that soil and groundwater at the site and adjacent property at 3618 North 11th Street is contaminated with chlorinated volatile organic compounds (CVOCs). Mitigation systems have been installed in on-site buildings and off-site where vapor concentrations are above applicable standards. Corrective actions are planned to address contaminants in site soil and groundwater to reduce risk to human health and the environment. A hazardous waste determination was included as part of the RAP.

Site Investigation Review

The DNR review letter of June 28, 2021 to GZA outlined the remaining investigative issues to be addressed for the site investigation to be considered complete. Additional information was submitted to the DNR on July 12, 2021. A utility vapor assessment and sampling results were submitted with the RAP. From the information submitted, the DNR has determined that the site investigation has been completed to the extent practicable.

Remedial Action Plan Review

Excavation with off-site disposal is planned for accessible areas of CVOC-impacted soil as a contaminant mass-reduction remedy. The excavation will be conducted in the parking area at the site and will extend into the adjacent public alley. A portion of the impacted soil will be treated on-site to reach non-hazardous contaminant levels prior to disposal at a Subtitle D landfill. A passive venting system will be installed within the excavated area which will be covered with an impermeable cap. The

current vapor mitigation systems will continue operating with post-excavation vapor system monitoring, sampling and evaluation. The elevator shafts of each apartment building will be sealed to prevent vapor migration within the buildings. Monitoring well replacement with natural attenuation monitoring of groundwater will be performed to assess the efficacy of the remedy. Continuing obligations and inclusion of the site on the DNR database will be required for case closure.

Based on our review of the RAP and the site investigation, the DNR approves the proposed RAP with the comments listed below. Future remedial actions may be warranted depending on the success of the remedial action and the results of future monitoring. Our comments are as follows:

- 1) The DNR considers the trichloroethylene (TCE) contaminated soil to be a listed hazardous waste. Prior information submitted as part of the site investigation indicated the solvent was used historically as a degreaser for operations conducted on-site and the discharge is associated with the use or storage of the solvent. As described in the RAP, the TCE-impacted soil will be treated on-site to non-hazardous contaminant levels that will allow the soil to be disposed of at a Subtitle D landfill;
- 2) A groundwater sample should be collected from piezometer well PZ-1 prior to abandonment to determine if the TCE concentration is at or below the Preventive Action Limit. If a sample is not collected prior to abandonment, the well must be replaced and sampled following soil excavation activities;
- 3) Additional details need to be submitted regarding post-excavation natural attenuation groundwater monitoring. This should include a description of field measurements to be used and what criteria will be used to indicate natural attenuation is occurring as an effective remedy. Clarify if access is granted for planned sampling of MW-10; and
- 4) Efforts should be made to access the 3618 North 11th Street home for post-excavation vapor sampling and system inspection.

A Wis. Admin. Code § NR 724.15(1) compliant remedial action documentation reporting must be submitted following completion of remedial activities.

We appreciate your efforts to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me at (414) 207-2179, or by email at adam.mcilheran@wisconsin.gov.

Sincerely,



Adam S. McIlheran
Hydrogeologist
Remediation and Redevelopment Program

cc: Kevin Hedinger, GZA GeoEnvironmental, Inc. (kevin.hedinger@gza.com)
Don Gallo, Axley Brynson, LLP (dgallo@axley.com)
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