

**Notice:** Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31 - 19.39, Wis. Stats.].

## Definitions

**"Property"** refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

**"Liability Clarification"** refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

**"Technical Assistance"** refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

**"Post-closure modification"** refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

## Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

**Do not use this form if one of the following applies:**

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: [dnr.wi.gov/topic/Brownfields/Pubs.html](http://dnr.wi.gov/topic/Brownfields/Pubs.html).

## Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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## Section 1. Contact and Recipient Information

### Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name		
Schlichholz	Sarah		Miller Compressing		
Mailing Address			City	State	ZIP Code
1640 W. Bruce St.			Milwaukee	WI	53204
Phone # (include area code)	Fax # (include area code)		Email		
(314) 872-2406			Sarah.Schlichholz@altertrading.com		

The requester listed above: (select all that apply)

- ☒ Is currently the owner ☐ Is considering selling the Property
- ☐ Is renting or leasing the Property ☐ Is considering acquiring the Property
- ☐ Is a lender with a mortgagee interest in the Property
- ☐ Other. Explain the status of the Property with respect to the applicant:

### Contact Information (to be contacted with questions about this request)

☐ Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name		
Bartelme	Alex	B	Ramboll Americas Engineering, Inc.		
Mailing Address			City	State	ZIP Code
234 W. Florida St., Fifth Floor			Milwaukee	WI	53204
Phone # (include area code)	Fax # (include area code)		Email		
(414) 531-0093			Alex.Bartelme@Ramboll.com		

### Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name		
Bartelme	Alex	B	Ramboll Americas Engineering, Inc.		
Mailing Address			City	State	ZIP Code
234 W. Florida St., Fifth Floor			Milwaukee	WI	53204
Phone # (include area code)	Fax # (include area code)		Email		
(414) 531-0093			Alex.Bartelme@Ramboll.com		

## Section 2. Property Information

Property Name			FID No. (if known)		
Miller Compressing Burnahm Canal (Alt SF)			241213720		
BRRS No. (if known)			Parcel Identification Number		
02-41-552940			4269988110		
Street Address			City	State	ZIP Code
1640 W. Bruce St.			Milwaukee	WI	53204
County	Municipality where the Property is located		Property is composed of:		Property Size Acres
Milwaukee	<input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Milwaukee		<input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels		

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1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

☐ No ☒ Yes

Date requested by: 12/13/2024

Reason: Ramboll is seeking Wisconsin Department of Natural Resources concurrence that the Subaqueous Engineering Control Area continues to meet the COMMP performance standards. Receiving concurrence before end of CY 2024 would simplify monitoring schedule for the year.

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

☒ No. **Include the fee that is required for your request in Section 3, 4 or 5.**

☐ Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

**Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:**

**Section 3. Technical Assistance or Post-Closure Modifications;**

**Section 4. Liability Clarification; or Section 5. Specialized Agreement.**

## Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: **[Numbers in brackets are for WI DNR Use]**

- ☐ No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- ☐ Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- ☐ Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- ☐ Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- ☐ Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- ☐ Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- ☐ Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- ☐ Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- ☐ Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- ☐ Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- ☐ Hazardous Waste Determination - **Include a fee of \$700.**
- ☒ Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- ☐ Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
  - ☐ Include a fee of \$300 for sites with residual soil contamination; and
  - ☐ Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

## Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

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☐ "Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292. 21(1)(c)2.,h.-i., Wis. Stats.:
  - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
  - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

☐ "Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

☐ Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- ☐ hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- ☐ Perceived environmental contamination - [649];
- ☐ hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- ☐ solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.



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## Section 4. Request for Liability Clarification (cont.)

- ☐ Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**
  - (1) a copy of the proposed lease;
  - (2) the name of the current owner of the Property and the person who will lease the Property;
  - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
  - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
  - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
  - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

- ☐ No Action Required (NAR) - NR 716.05, [682]

- ❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

- ☐ Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

- ❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

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Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

## Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: [dnr.wi.gov/topic/Brownfields/Igu.html#tabx4](http://dnr.wi.gov/topic/Brownfields/Igu.html#tabx4).

- ☐ Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

- ☐ Agreement for assignment of tax foreclosure judgement - s. 75.106, Wis. Stats. [666]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

- ☐ Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

- ❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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## Section 6. Other Information Submitted

Identify all materials that are included with this request.

**Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.**

**Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.**

☐ Phase I Environmental Site Assessment Report - Date: \_\_\_\_\_

☐ Phase II Environmental Site Assessment Report - Date: \_\_\_\_\_

☒ Legal Description of Property (required for all liability requests and specialized agreements)

☒ Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

☐ Groundwater ☐ Soil ☐ Sediment ☐ Other medium - Describe: \_\_\_\_\_

Date of Collection: \_\_\_\_\_

☐ A copy of the closure letter and submittal materials

☐ Draft tax cancellation agreement

☐ Draft agreement for assignment of tax foreclosure judgment

☒ Other report(s) or information - Describe: PCMR for May 2024 Annual Monitoring - Addendum 1

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

☐ Yes - Date (if known): \_\_\_\_\_

☐ No


**Note:** The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

## Section 7. Certification by the Person who completed this form

☐ I am the person submitting this request (requester)

☒ I prepared this request for: Sarah Schlichtholz, Alter Trading Co.  
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

  
Signature

11-19-2024

Date Signed

Senior Project Scientist

Title

(414) 531-0093

Telephone Number (include area code)

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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## Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

### DNR NORTHERN REGION

Attn: RR Program Assistant  
Department of Natural Resources  
223 E Steinfest Rd Antigo, WI 54409

### DNR NORTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2984 Shawano Avenue  
Green Bay WI 54313

### DNR SOUTH CENTRAL REGION

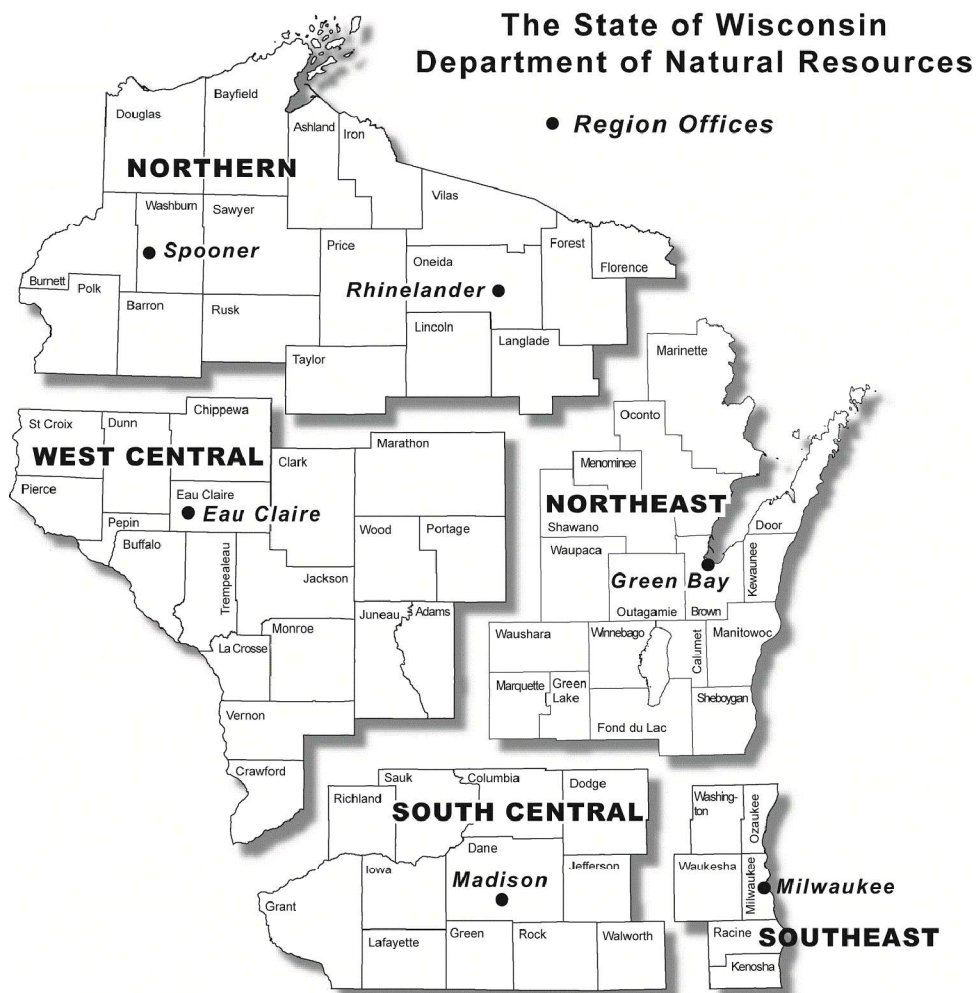
Attn: RR Program Assistant  
Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg WI 53711

### DNR SOUTHEAST REGION

Attn: RR Program Assistant  
Milwaukee DNR Office  
1027 West St. Paul Ave  
Milwaukee WI 53233

### DNR WEST CENTRAL REGION

Attn: RR Program Assistant  
Department of Natural Resources  
1300 Clairemont Ave.  
Eau Claire WI 54702



*Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.*

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

Intended for

**Wisconsin Department of Natural Resources**

Date

**11/18/2024**

Project No.

**1950075954**

**POST-CONSTRUCTION MONITORING REPORT  
FOR MAY 2024 ANNUAL MONITORING –  
ADDENDUM 1**

**BURNHAM CANAL SUPERFUND ALTERNATIVE SITE  
MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN  
MILLER COMPRESSING COMPANY**

**WDNR BRRTS #: 02-41-552940**

**EPA ID: WIN000510222**

**POST-CONSTRUCTION MONITORING REPORT FOR MAY 2024 ANNUAL  
MONITORING – ADDENDUM 1  
BURNHAM CANAL SUPERFUND ALTERNATIVE SITE**

Project name **Burnham Canal Superfund Alternative Site**  
Project no. **1950075954**  
Recipient **Wisconsin Department of Natural Resources**  
Document type **Post-Construction Monitoring Report Addendum**  
Revision **0**  
Date **11/18/2024**  
Prepared by **Alex Bartelme**  
Checked by **Rich Weber**  
Approved by **Brian White**

Ramboll  
234 W. Florida Street  
Fifth Floor  
Milwaukee, WI 53204  
USA

T 414-837-3607  
F 414-837-3608  
<https://ramboll.com>



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**Alex Bartelme**  
Senior Project Scientist



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**Brian White**  
Executive Director

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Figure 3 May 2024 Post-Construction Monitoring Bathymetric Surface vs. 2021 As-Built Betterment Surface and September 2024 Poling Locations

TABLES

Table 1 September 2024 Post-Construction Poling Summary

APPENDICES

Appendix A Photo Log

## 1. INTRODUCTION

Ramboll Americas Integrated Solutions, Inc. (Ramboll) is providing this Addendum 1 to the *Post-Construction Monitoring Report for May 2024 Annual Monitoring* dated August 23, 2024, to document additional post-construction poling activities completed on September 3, 2024, at the Burnham Canal Superfund Alternative Site (Site) in the City of Milwaukee, Milwaukee County, Wisconsin. The site location is depicted in **Figure 1**. Confirmation poling activities were performed to provide supplementary validation that the Subaqueous Engineering Control Area continues to meet the performance standards outlined in Ramboll's Revised Cap Operations, Maintenance, and Monitoring Plan (COMMP). Previous annual monitoring events indicated that the Betterment is in good condition and thereby the Cap is considered in-tact and does not require maintenance. However, out of an abundance of caution and in addition to the required Annual Monitoring event, poling was implemented in the isolated areas where the May 2024 post-construction monitoring bathymetric survey is lower in elevation compared to the as-built Cap elevation. Poling results are described in the sections below comprising this Addendum.

## 2. BACKGROUND

The project addressed contaminated sediment and other improvements at the Site as documented in Ramboll's Construction Documentation Report dated August 25, 2021. Post-construction monitoring activities have been on-going since June 2022 and have followed Ramboll's Revised COMMP which was approved by the Wisconsin Department of Natural Resources (WDNR) on September 7, 2021. The COMMP sets forth the post-construction requirements to monitor, maintain, and properly respond to changes in the capped areas of the Site that may pose a threat to human health or the environment (Ramboll, 2021a). The COMMP is applicable for the period spanning the completion of the Remedial Subaqueous Aggregate Cap (Cap) and Voluntary Betterment (Betterment) construction (June 8, 2021) to WDNR approval of Site closure under Wis. Admin. Code ch. NR 726.

The May 2024 post-construction bathymetric survey largely identified current surface elevations that are greater than the as-built Cap surface elevations. However, there were several isolated instances where the May 2024 bathymetric surface was lower than the as-built Cap surface. Specifically, the isolated instances are located in Approval Unit 2 near CSO-194 and the transition between Approval Unit 5 and Approval Unit 6 where the May 2024 post-construction monitoring bathymetric surface is lower in elevation compared to the as-built Cap surface elevation. In order to provide supplementary validation that the betterment layer remains in place, confirmation poling was conducted on September 3, 2024. Additional details about the May 2024 annual COMMP event activities were documented in the *Post-Construction Monitoring Report for May 2024 Annual Monitoring* dated August 23, 2024, provided to the WDNR and uploaded to the WDNR Remediation and Redevelopment Program Submittal Portal on the same date.

## 3. SEPTEMBER 2024 POLING RESULTS

Additional poling activities were conducted on September 3, 2024, to provide supplementary validation of the May 2024 annual poling results which indicated that Betterment material is present and in good



condition. These additional poling locations were targeted in the isolated areas where the May 2024 post-construction monitoring bathymetric surface is lower in elevation compared to the as-built Cap surface elevation. Between the May 2024 poling event and September 3, 2024, the Site did not receive a rainfall exceeding the 25-year, 24-hour storm event of 4.56 inches as defined by the National Oceanic and Atmospheric Administration (NOAA) Precipitation Frequency Data Server (PFDS) (NOAA, 2024). As such, storm-related inspection and poling activities were not completed between the May 2024 and September 2024 poling events. Results from the annual inspection and poling activities are discussed below.

Confirmation poling of the Subaqueous Engineering Control Area was conducted by Ramboll on September 3, 2024. Post-construction as-built Betterment surface contours on **Figure 2**, and the May 2024 post-construction monitoring bathymetric survey surface contours (2024) on **Figure 3**, were both overlaid with poling locations from the September 2024 confirmation event. 84 poling locations were completed with relatively high density in a grid like pattern within the Subaqueous Engineering Control Area. A 3-foot by 3-foot grid was imposed over each of the three isolated areas where the May 2024 post-construction monitoring bathymetric survey was lower than the as-built Cap surface. 16 poling locations were completed in the area near the combined sewer outfall (CSO) within the eastern boundary of Approval Unit (AU) 1, and western boundary of AU2. 20 poling locations were completed in the area along the eastern boundary of AU5 and the western boundary AU6. 48 poling locations were completed in a third area within northwest quadrant of AU6.

Prior to the poling event, target coordinates for each poling location were loaded onto a real-time kinematic (RTK) global positioning system (GPS). The GPS was used to navigate to a cell within the imposed grid and log actual poling locations within the grid pattern. The actual poling locations are similar to the target locations but may generally be offset by a few feet due to GPS accuracy limitations and practical limitations with navigating to and remaining at the exact coordinates while the vessel is spudded at the location because of wind and flowing water influences.

As summarized in **Table 1**, during confirmation poling in September 2024, the presence of riprap or select crushed (Betterment) aggregate was confirmed to be present at all poling locations in the Subaqueous Engineering Control Area. As such, per the COMMP (Ramboll, 2021a), no further action is required with respect to maintenance or contingent activities on the Subaqueous Cap or Betterment.

While the poling criteria for further evaluation and/or repair is the absence of riprap or select crushed aggregate (which was not observed during the poling event), the COMMP (Ramboll, 2021a) also requires an estimation of the elevation of the top of the Betterment surface at the poling locations and comparison to the elevations provided in the bathymetric survey. This information is provided in **Table 1** at each of the confirmation poling locations.

## 4. CONCLUSIONS AND RECOMMENDATIONS

Confirmation poling indicates that riprap or select crushed aggregate is present in the Subaqueous Engineering Control Area. Poling elevation estimates are for informational purposes only. Per the requirements of the COMMP (Ramboll, 2021a), no further evaluation, maintenance, or repair of any area of the Site is necessary at this time.

Ramboll is seeking WDNR concurrence that the Subaqueous Engineering Control Area continues to meet the COMMP performance standards and that no further maintenance or contingent actions are required at this time.

## 5. REFERENCES

- National Oceanic and Atmospheric Administration. NOAA's National Weather Service, Hydrometeorological Design Studies Center, Precipitation Frequency Data Server (PFDS). NOAA's National Weather Service. [https://hdsc.nws.noaa.gov/hdsc/pfds/pfds\\_map\\_cont.html?bkmrk=wj](https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=wj). Accessed July 30, 2024.
- Ramboll Americas Integrated Solutions, Inc. (Ramboll). September 7, 2021a. *Revised Cap Operations, Maintenance, and Monitoring Plan, Burnham Canal Superfund Alternative Site, Milwaukee, Milwaukee County, Wisconsin, WDNR BRRTS #: 02-41-552940, EPA ID: WIN 000510222*.
- Ramboll. August 4, 2024. *Post-Construction Monitoring Report for May 2024 Annual Monitoring*

Table 1. September 2024 Post-Construction Confirmation Poling Summary

Post-Construction Monitoring Report - Addendum 1  
Miller Compressing Company  
Burnham Canal Superfund Alternative Site  
1640 W. Bruce St. Milwaukee, Wisconsin  
BRRS#: 02-41-552940 USEPA#: WIN000510222

Approval Unit ID	Poling Location ID	Date	Water Elevation <sup>1</sup> (CMD ft.)	Depth to Aggregate from Water Surface (ft.)	Top of Aggregate Elevation (CMD ft.)	Soft Push <sup>2</sup> (ft.)	Hard Push <sup>3</sup> (ft.)	Total Push Penetration Depth (ft.)	Comments (Riprap, Select Crushed, or Other Present)
2	A1 - CSO	9/3/2024	-0.3	1.80	-2.10	0.00	0.00	0.00	Hard, riprap present
2	A2- CSO	9/3/2024	-0.3	4.10	-4.40	0.00	0.00	0.00	Hard, riprap present
2	A3 - CSO	9/3/2024	-0.3	5.30	-5.60	0.00	0.00	0.00	Hard, riprap present
2	A4 - CSO	9/3/2024	-0.3	7.30	-7.60	0.00	0.00	0.00	Hard, riprap present
2	B1 -CSO	9/3/2024	-0.3	1.40	-1.70	0.00	0.00	0.00	Hard, visual evidence of riprap around obvert of pipe below water surface
2	B2 -CSO	9/3/2024	-0.3	8.90	-9.20	0.00	0.00	0.00	Hard, riprap present
2	B3 - CSO	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, riprap present
2	B4 - CSO	9/3/2024	-0.3	6.80	-7.10	0.20	0.00	0.20	Out front of outfall, soft material on top of riprap
2	C1 -CSO	9/3/2024	-0.3	2.90	-3.20	0.00	0.00	0.00	Outer edge of pipe
2	C2 -CSO	9/3/2024	-0.3	5.90	-6.20	0.00	0.00	0.00	Hard, riprap present
2	C3 - CSO	9/3/2024	-0.3	7.10	-7.40	0.00	0.00	0.00	Hard, riprap present
2	C4 - CSO	9/3/2024	-0.3	7.20	-7.50	0.00	0.00	0.00	Hard, riprap present
2	D1 - CSO	9/3/2024	-0.3	5.50	-5.80	0.00	0.00	0.00	Hard, riprap present
2	D2 - CSO	9/3/2024	-0.3	7.40	-7.70	0.00	0.00	0.00	Hard, riprap present
2	D3 - CSO	9/3/2024	-0.3	6.90	-7.20	0.00	0.00	0.00	Hard, riprap present
2	D4 - CSO	9/3/2024	-0.3	8.20	-8.50	0.00	0.00	0.00	Hard, riprap present
5	A1 -AREA1	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	A2 - AREA1	9/3/2024	-0.3	8.40	-8.70	0.00	0.00	0.00	Hard, select crushed present
6	A3 -AREA1	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	A4 - AREA1	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, select crushed present
6	A5 -AREA1	9/3/2024	-0.3	7.90	-8.20	0.00	0.00	0.00	Hard, select crushed present
5	B1 -AREA1	9/3/2024	-0.3	8.30	-8.60	0.00	0.00	0.00	Hard, select crushed present
6	B2 - AREA1	9/3/2024	-0.3	8.60	-8.90	0.10	0.00	0.10	Hard, select crushed present

Table 1. September 2024 Post-Construction Confirmation Poling Summary

Post-Construction Monitoring Report - Addendum 1  
Miller Compressing Company  
Burnham Canal Superfund Alternative Site  
1640 W. Bruce St. Milwaukee, Wisconsin  
BRRS#: 02-41-552940 USEPA#: WIN000510222

Approval Unit ID	Poling Location ID	Date	Water Elevation <sup>1</sup> (CMD ft.)	Depth to Aggregate from Water Surface (ft.)	Top of Aggregate Elevation (CMD ft.)	Soft Push <sup>2</sup> (ft.)	Hard Push <sup>3</sup> (ft.)	Total Push Penetration Depth (ft.)	Comments (Riprap, Select Crushed, or Other Present)
6	B3 -AREA1	9/3/2024	-0.3	8.80	-9.10	0.10	0.00	0.10	Hard, select crushed present
6	B4 - AREA 1	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	B5 -AREA1	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, select crushed present
5	C1 -AREA1	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, select crushed present
6	C2 - AREA1	9/3/2024	-0.3	8.30	-8.60	0.00	0.00	0.00	Hard, select crushed present
6	C3 -AREA1	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	C4 - AREA1	9/3/2024	-0.3	8.70	-9.00	0.10	0.00	0.10	Hard, select crushed present
6	C5 -AREA1	9/3/2024	-0.3	8.10	-8.40	0.00	0.00	0.00	Hard, select crushed present
5	D1 -AREA1	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, select crushed present
6	D2 - AREA1	9/3/2024	-0.3	7.90	-8.20	0.00	0.00	0.00	Hard, select crushed present
6	D3 -AREA1	9/3/2024	-0.3	8.30	-8.60	0.00	0.00	0.00	Hard, select crushed present
6	D4 - AREA 1	9/3/2024	-0.3	8.00	-8.30	0.20	0.00	0.20	Hard, select crushed present
6	D5 -AREA1	9/3/2024	-0.3	8.00	-8.30	0.00	0.00	0.00	Hard, select crushed present
6	A1 -AREA2	9/3/2024	-0.3	6.60	-6.90	0.00	0.00	0.00	Hard, select crushed present
6	A2 - AREA2	9/3/2024	-0.3	7.20	-7.50	0.00	0.10	0.10	Hard, select crushed present
6	A3 -AREA2	9/3/2024	-0.3	8.70	-9.00	0.00	0.00	0.00	Hard, select crushed present
6	A4 - AREA2	9/3/2024	-0.3	8.10	-8.40	0.00	0.00	0.00	Hard, select crushed present
6	A5 -AREA2	9/3/2024	-0.3	7.90	-8.20	0.00	0.00	0.00	Hard, select crushed present
6	A6 -AREA2	9/3/2024	-0.3	8.70	-9.00	0.00	0.00	0.00	Hard, select crushed present
6	B1 -AREA2	9/3/2024	-0.3	7.00	-7.30	0.00	0.00	0.00	Hard, select crushed present
6	B2 - AREA2	9/3/2024	-0.3	7.50	-7.80	0.00	0.00	0.00	Hard, select crushed present
6	B3 -AREA2	9/3/2024	-0.3	8.60	-8.90	0.00	0.00	0.00	Hard, select crushed present
6	B4 - AREA2	9/3/2024	-0.3	8.40	-8.70	0.00	0.00	0.00	Hard, select crushed present
6	B5 - AREA2	9/3/2024	-0.3	8.40	-8.70	0.10	0.00	0.10	Hard, select crushed present

Table 1. September 2024 Post-Construction Confirmation Poling Summary

Post-Construction Monitoring Report - Addendum 1  
Miller Compressing Company  
Burnham Canal Superfund Alternative Site  
1640 W. Bruce St. Milwaukee, Wisconsin  
BRRS#: 02-41-552940 USEPA#: WIN000510222

Approval Unit ID	Poling Location ID	Date	Water Elevation <sup>1</sup> (CMD ft.)	Depth to Aggregate from Water Surface (ft.)	Top of Aggregate Elevation (CMD ft.)	Soft Push <sup>2</sup> (ft.)	Hard Push <sup>3</sup> (ft.)	Total Push Penetration Depth (ft.)	Comments (Riprap, Select Crushed, or Other Present)
6	B6 - AREA 2	9/3/2024	-0.3	8.20	-8.50	0.00	0.00	0.00	Hard, select crushed present
6	C1 - AREA2	9/3/2024	-0.3	7.60	-7.90	0.20	0.00	0.20	Hard, select crushed present
6	C2 - AREA2	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	C3 - AREA2	9/3/2024	-0.3	8.80	-9.10	0.00	0.00	0.00	Hard, select crushed present
6	C4 - AREA2	9/3/2024	-0.3	9.10	-9.40	0.00	0.00	0.00	Hard, select crushed present
6	C5 - AREA2	9/3/2024	-0.3	8.50	-8.80	0.10	0.00	0.10	Hard, select crushed present
6	C6 - AREA2	9/3/2024	-0.3	9.20	-9.50	0.20	0.00	0.20	Hard, select crushed present
6	D1 -AREA2	9/3/2024	-0.3	8.60	-8.90	0.00	0.00	0.00	Hard, select crushed present
6	D2 - AREA2	9/3/2024	-0.3	9.10	-9.40	0.00	0.00	0.00	Hard, select crushed present
6	D3 -AREA2	9/3/2024	-0.3	8.90	-9.20	0.00	0.00	0.00	Hard, select crushed present
6	D4 - AREA2	9/3/2024	-0.3	8.50	-8.80	0.00	0.00	0.00	Hard, select crushed present
6	D5 -AREA2	9/3/2024	-0.3	9.10	-9.40	0.10	0.00	0.10	Hard, select crushed present
6	D6 - AREA2	9/3/2024	-0.3	9.00	-9.30	0.00	0.00	0.00	Hard, select crushed present
6	E1 -AREA2	9/3/2024	-0.3	7.80	-8.10	0.00	0.00	0.00	Hard, select crushed present
6	E2 - AREA2	9/3/2024	-0.3	9.10	-9.40	0.00	0.00	0.00	Hard, select crushed present
6	E3 -AREA2	9/3/2024	-0.3	9.20	-9.50	0.10	0.00	0.10	Hard, select crushed present
6	E4 - AREA2	9/3/2024	-0.3	9.00	-9.30	0.10	0.00	0.10	Hard, select crushed present
6	E5 -AREA2	9/3/2024	-0.3	9.00	-9.30	0.00	0.00	0.00	Hard, select crushed present
6	E6 - AREA2	9/3/2024	-0.3	8.90	-9.20	0.00	0.00	0.00	Hard, select crushed present
6	F1 -AREA2	9/3/2024	-0.3	8.90	-9.20	0.00	0.00	0.00	Hard, select crushed present
6	F2 - AREA2	9/3/2024	-0.3	9.70	-10.00	0.00	0.00	0.00	Hard, select crushed present
6	F3 -AREA2	9/3/2024	-0.3	9.40	-9.70	0.00	0.00	0.00	Hard, select crushed present
6	F4 - AREA2	9/3/2024	-0.3	9.10	-9.40	0.00	0.00	0.00	Hard, select crushed present
6	F5 -AREA2	9/3/2024	-0.3	9.00	-9.30	0.00	0.00	0.00	Hard, select crushed present

Table 1. September 2024 Post-Construction Confirmation Poling Summary

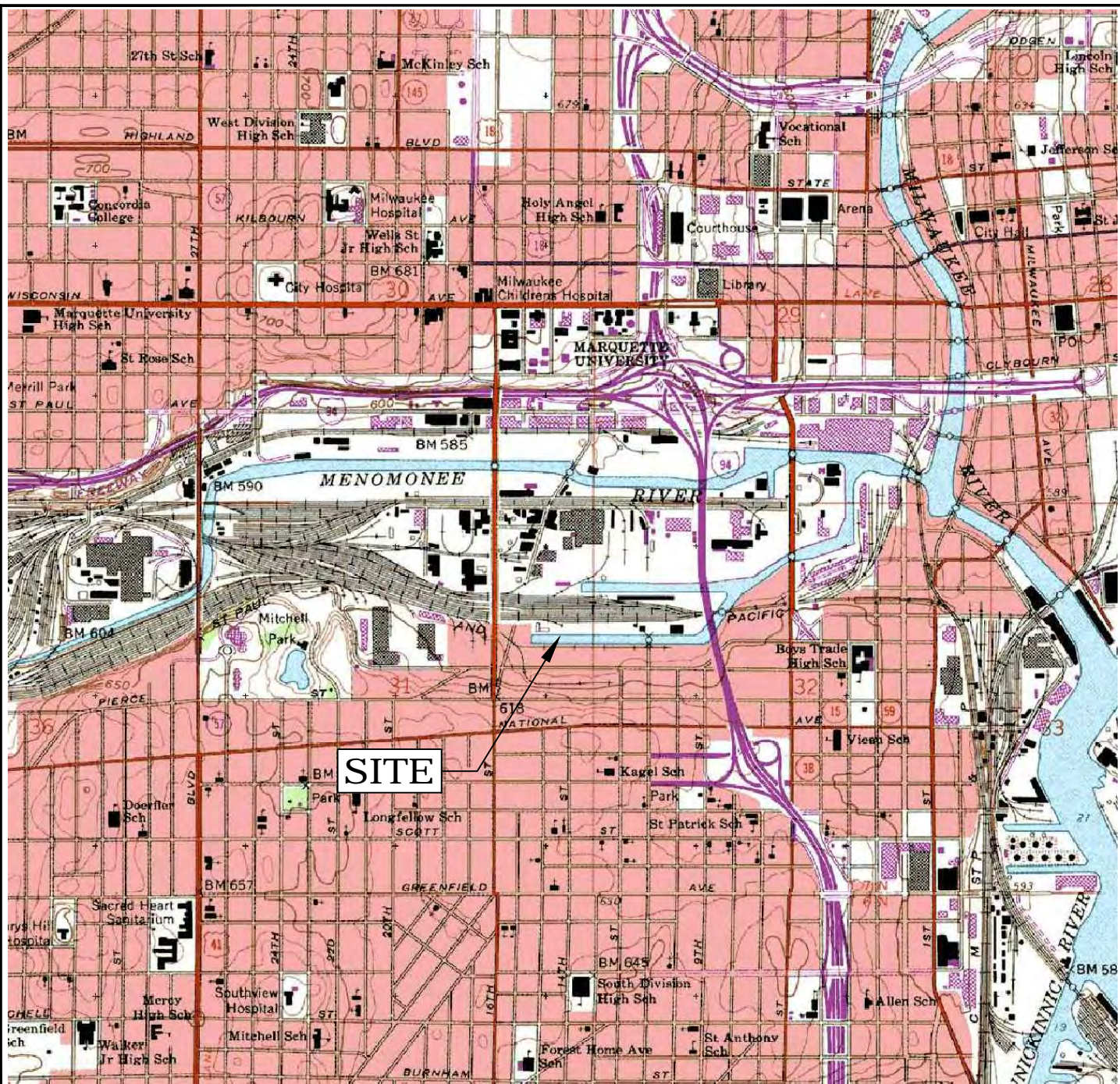
Post-Construction Monitoring Report - Addendum 1  
Miller Compressing Company  
Burnham Canal Superfund Alternative Site  
1640 W. Bruce St. Milwaukee, Wisconsin  
BRRTS#: 02-41-552940 USEPA#: WIN000510222

Approval Unit ID	Poling Location ID	Date	Water Elevation <sup>1</sup> (CMD ft.)	Depth to Aggregate from Water Surface (ft.)	Top of Aggregate Elevation (CMD ft.)	Soft Push <sup>2</sup> (ft.)	Hard Push <sup>3</sup> (ft.)	Total Push Penetration Depth (ft.)	Comments (Riprap, Select Crushed, or Other Present)
6	F6 - AREA2	9/3/2024	-0.3	8.30	-8.60	0.00	0.00	0.00	Hard, select crushed present
6	G1 - AREA2	9/3/2024	-0.3	8.60	-8.90	0.00	0.00	0.00	Hard, select crushed present
6	G2 - AREA2	9/3/2024	-0.3	9.40	-9.70	0.00	0.00	0.00	Hard, select crushed present
6	G3 - AREA2	9/3/2024	-0.3	9.00	-9.30	0.00	0.00	0.00	Hard, select crushed present
6	G4 - AREA2	9/3/2024	-0.3	9.20	-9.50	0.00	0.00	0.00	Hard, select crushed present
6	G5 - AREA2	9/3/2024	-0.3	9.30	-9.60	0.00	0.00	0.00	Hard, select crushed present
6	G6 - AREA2	9/3/2024	-0.3	9.20	-9.50	0.00	0.00	0.00	Hard, select crushed present
6	H1 - AREA2	9/3/2024	-0.3	8.10	-8.40	0.00	0.00	0.00	Hard, select crushed present
6	H2 - AREA2	9/3/2024	-0.3	8.80	-9.10	0.00	0.00	0.00	Hard, select crushed present
6	H3 - AREA2	9/3/2024	-0.3	8.20	-8.50	0.00	0.00	0.00	Hard, select crushed present
6	H4 - AREA2	9/3/2024	-0.3	8.60	-8.90	0.00	0.00	0.00	Hard, select crushed present
6	H5 - AREA2	9/3/2024	-0.3	9.10	-9.40	0.00	0.00	0.00	Hard, select crushed present
6	H6 - AREA2	9/3/2024	-0.3	8.80	-9.10	0.00	0.00	0.00	Hard, select crushed present

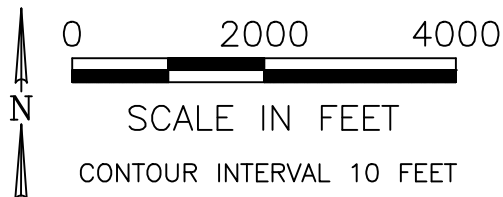
(O: KJS 9/3/2024, C: ABB10/25/2024)

Notes:  
1. Water elevation is approximated using the onsite staff gauge and recorded prior to poling data collection.  
2. Soft push poling is performed with nominal strength supplied by the sampler's extended arms only.  
3. Hard push poling is performed with nominal strength and body weight supplied by the sampler's arms and torso.  
CMD = City of Milwaukee Datum  
ft. = feet





SOURCE: EARTHVISIONS U.S. TERRAIN SERIES,  
 © EARTHVISIONS, INC. 603-433-8500.  
 USGS 7.5 MINUTE QUADRANGLE,  
 MILWAUKEE. DATED 1958.  
 PHOTOREVISED 1971.



## SITE LOCATION MAP

WDNR BRRTS #:02-41-552940  
 EPA ID: WIN000510222

Construction Documentation Report  
 BURNHAM CANAL SUPERFUND ALTERNATIVE SITE  
 MILLER COMPRESSING COMPANY  
 MILWAUKEE, WISCONSIN

PROJECT NO.  
 1950075954

DRAWING NO.  
 2117-7-A01

FIGURE NO.

DRAWN: DMD DATE: 05/04/15 CHK'D: Y\_Z DATE: 02/02/16 APP'D: RJB DATE: 02/02/16

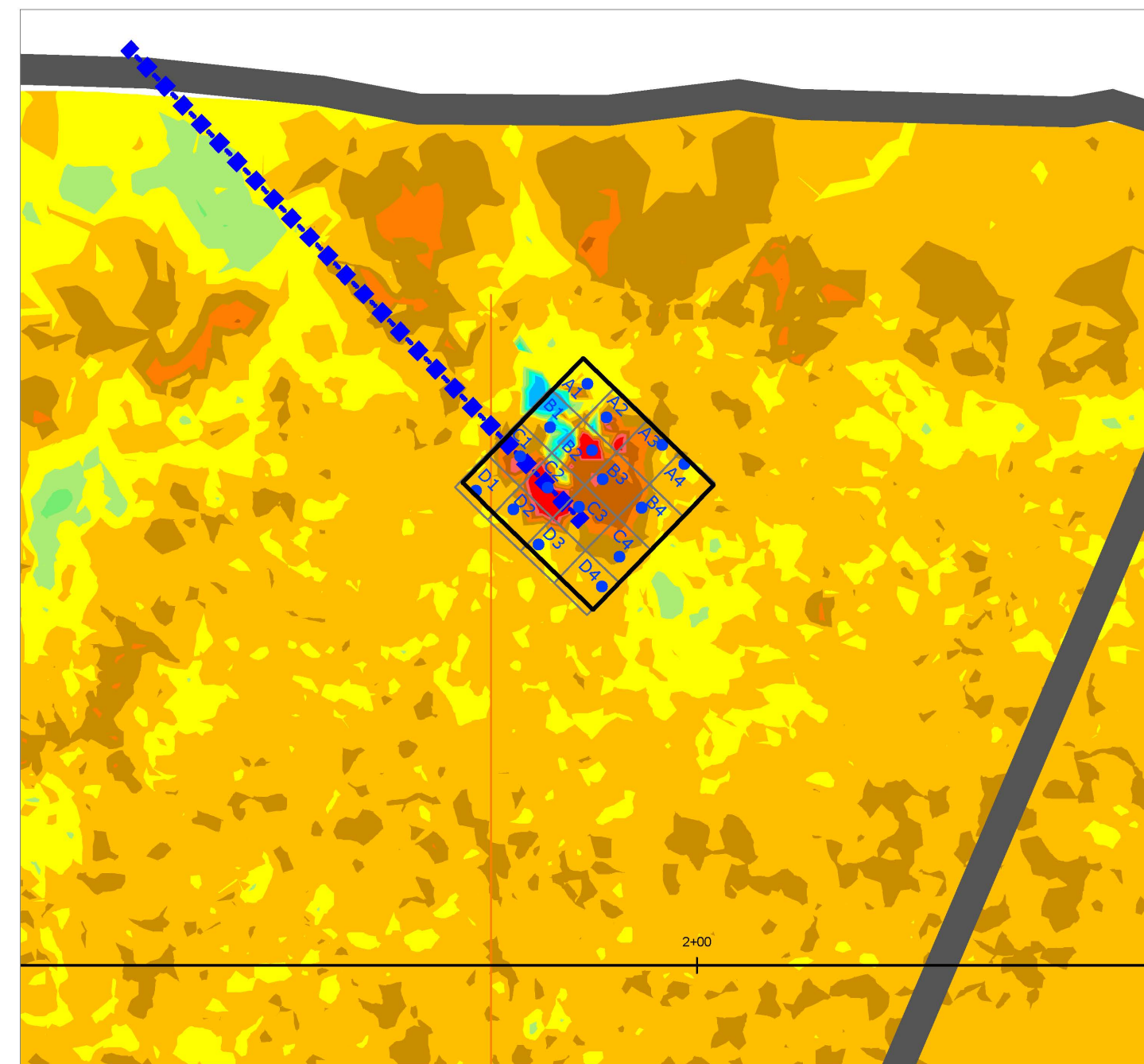
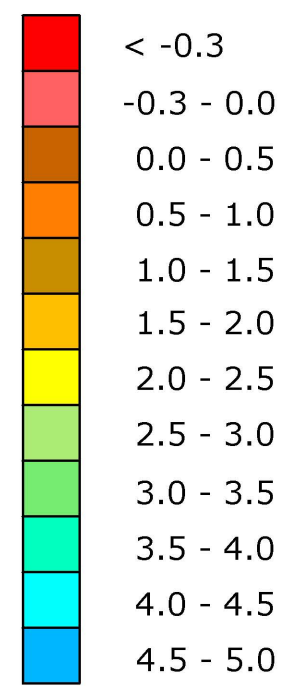
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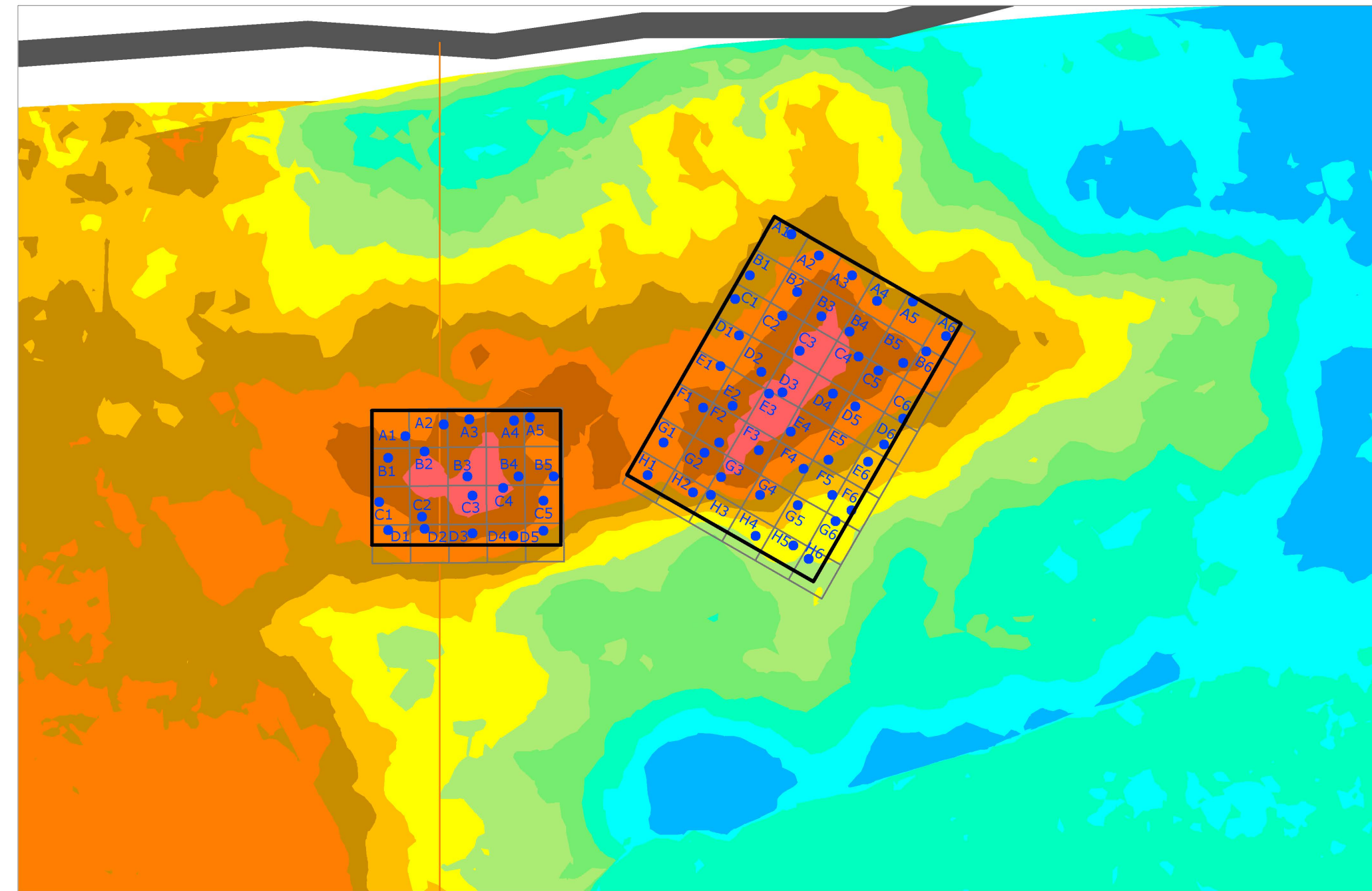




2024 SURVEY DATA VS.  
2021 AS-BUILT RA CAP (IN FEET)

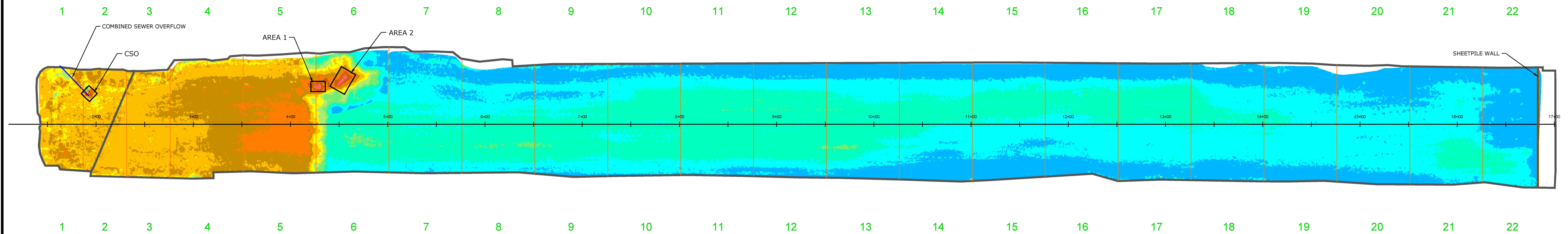


CSO AREA  
1" = 10'



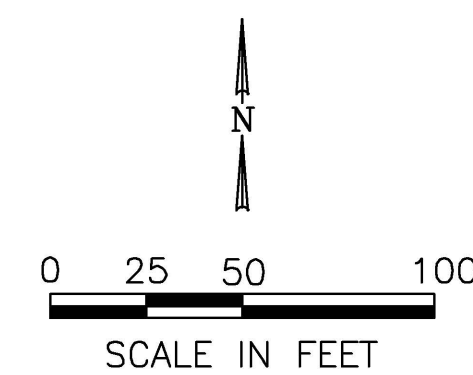
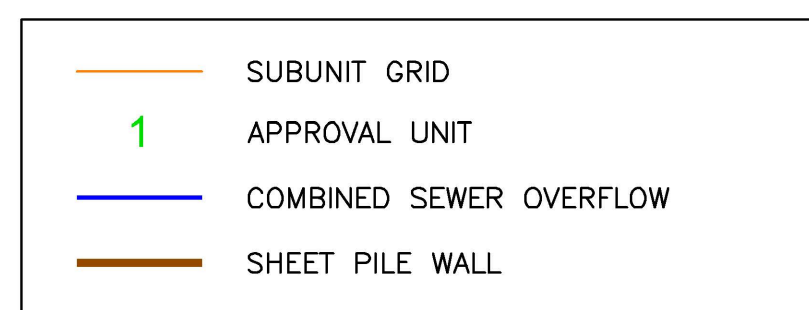
AREA 1  
1" = 10'

AREA 2  
1" = 10'



NOTES:

1. Poling locations collected during supplemental poling event on September 3, 2024.



RAMBOLL

WDNR BRRTS #: 02-41-552940  
EPA ID: WIN000510222

PROJECT NO. 1950075954	MAY 2024 POST-CONSTRUCTION MONITORING BATHYMETRIC SURFACE VS. AS-BUILT CAP SURFACE	
DRAWN BY: CNH/MSB	BURNHAM CANAL POST-CONSTRUCTION MONITORING REPORT BURNHAM CANAL SUPERFUND ALTERNATIVE SITE	
CHECKED BY: ABB	MILLER COMPRESSING COMPANY MILWAUKEE, WI	
APPROVED BY: MDW		FIGURE 3



Client: Miller Compressing Company	Project: Burnham Canal Post-Construction Monitoring	
Site Name: Burnham Canal SAS	Site Location: Milwaukee, Wisconsin	
Photograph ID: 1	Date: 9/3/2024	Comments: View of Unpaved Engineering Control Area looking northwest.



**Photograph ID:** 2

**Date:** 9/3/2024

**Comments:** View of Unpaved Engineering Control Area looking southwest.





**Photograph ID:** 3

**Date:** 9/3/2024

**Comments:** View of Subaqueous Engineering Control Area in the foreground and the Unpaved Engineering Control Area in the background, looking west.



Photograph ID: 4	Date: 9/3/2024	Comments: View of Subaqueoues Engineering Control Area in the foreground and the Unpaved Engineering Control Area in the background, looking west.
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Photograph ID: 5	Date: 9/3/2024	Comments: View of Unpaved Engineering Control Area, looking north.
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Photograph ID: 6	Date: 9/3/2024	Comments: View of Unpaved Engineering Control Area, looking north.
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