

November 13, 2019

Mr. Joshua Ivey Milwaukee Holdings, LLC 913 29th Street Des Moines, Iowa 50301

RE: Additional Site Investigation (SI) Information

Former Comedy Club Café

615 E. Brady Street

Milwaukee, Wisconsin 53202 UEC Project No. 17028.4 BRRTS No. 02-41-553001

Dear Mr. Ivey:

In a July 3, 2018 letter, Nancy Ryan of the Wisconsin Department of Natural Resources (WDNR) requested additional information from United Engineering Consultants, Inc. (United) prior to approval of the Site Investigation (SI) report dated May 23, 2018 submitted to the WDNR on May 24, 2018. The following paragraphs discuss the six (6) items outlined in the WDNR correspondence. A summary of each WDNR request is italicized.

The WDNR requested a discussion of the potential for vapor migration along underground utilities within the N. Jackson Street and E. Brady Street right-of-ways due to the documented and/or extrapolated presence of trichloroethene (TCE), tetrachloroethene (PCE) and cis-1,2-dichloroethene at concentrations in exceedance of their respective Industrial and/or Non-Industrial Direct Contact and/or Groundwater Pathway Residual Contaminant Levels (RCLs) in these right-of-ways.

The extrapolated lateral extent of the TCE impacted soil at concentrations above its Non-Industrial and Industrial Direct Contact and Groundwater Pathway RCLs, the PCE affected soil at concentrations above its Non-Industrial Direct Contact and Groundwater Pathway RCLs and the cis-1,2-dichloroethene impacted soil at concentrations above its Groundwater Pathway RCL extend into the N. Jackson Street right-of-way. The estimated plume includes the abandoned potable water lateral and possibly the abandoned natural gas lateral which formerly serviced the site building.

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Although the extrapolated plume does not intersect the potable water, sanitary sewer and natural gas mains located in the N. Jackson Street right-of-way, vapor migration into these utility trenches is possible. However, if chlorinated solvents have migrated into these utility trenches, no buildings are present west and north of the subject property beyond the N. Jackson Street, N. Water Street and E. Brady Street right-of-ways. In addition, the vapor beneath the basement floor of the residence immediately to the south of the subject property at 1680 N. Jackson Street was analyzed for the presence of Volatile Organic Compounds (VOC) in June and November of 2015. Laboratory analytical results indicated no Volatile Organic Compounds (VOC) were present in the sub-slab vapor at concentrations in exceedance of their respective Residential Sub-Slab Vapor Risk Screening Levels (VRSLs).

The documented lateral extent of the PCE impacted soil at concentrations above its Groundwater Pathway RCL extends into the E. Brady Street right-of-way and includes an underground electric line located immediately adjacent to the northern edge of the sidewalk. The potential for vapor migration into the associated trench is high. Vapor may also have migrated further north into an additional underground electric and a natural gas main. However, if chlorinated solvents have migrated into these utility trenches, no buildings are present west, north and northeast of the subject property beyond the N. Water Street and E. Brady Street right-of-ways.

The WDNR requested that the inferred extent of the chlorinated solvent contamination attributable to the previous dry cleaning operations performed by Queensway at the former Comedy Club Café property be delineated to the east. In addition, the WDNR requested that the potential threat of vapor intrusion into the building at 1681 N. Van Buren Street be assessed.

The source of the chlorinated solvent release at the 1681 N. Van Buren Street property is most likely due to the previous dry cleaning operations at this parcel also by Queensway from 1963 to 1966. The TCE and PCE concentrations which exceed their respective Groundwater Pathway RCLs from each release appear to have migrated into the adjacent alleyway.

The TCE concentrations in the one (1) to two and one-half (2½) foot interval at GP-12 and GP-13 which were advanced immediately adjacent to the eastern property line of the former Comedy Club Café parcel are 0.0478 mg/kg and 0.0342 mg/kg, respectively. The TCE concentrations increase to 0.479 mg/kg and 0.229 mg/kg at the approximate seven (7) to nine (9) foot and seven and one-half (7½) to ten (10) foot sample intervals at GP-12 and GP-13, respectively.

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The TCE concentration at the one (1) to three (3) foot sample interval at GP-29 which is located immediately adjacent to the western property line of the 1681 N. Van Buren Street property is 0.0439 mg/kg while TCE is not present at a concentration at or above its detection limit at the approximate seven (7) to nine (9) foot sample interval. The absence of TCE at the seven (7) to nine (9) foot interval at this location appears to indicate that the documented shallow TCE concentration in exceedance of its Groundwater Pathway RCL at GP-29 is most likely from the release at the 1681 N. Van Buren Street parcel. The TCE concentrations in exceedance of its Groundwater Pathway RCL at GP-12 and GP-13 are most likely from the release at the former Comedy Club Café property.

The TCE concentrations in exceedance of its Groundwater Pathway RCL on the 1681 N. Van Buren Street parcel extend from the near surface soils to at least ten (10) feet along the northern property line. TCE concentrations in exceedance of its Groundwater Pathway RCL extends into the E. Brady Street right-of-way at SP-15 at approximate depths ranging from two (2) to eighteen (18) feet. TCE is not present in the alley way at KB-12A, GP-14, GP-28, SP-11, SP-12, SP-13, KB-30, KB-31 and KB-32 at concentrations at or above its detection limit at approximate depths ranging from one (1) to fifteen (15) feet.

The PCE concentrations in the one (1) to two and one-half (2½) foot interval in GP-12 and GP-13 which were advanced immediately adjacent to the eastern property line of the former Comedy Club Café are 0.258 mg/kg and 0.584 mg/kg, respectively. The PCE concentrations increase to 7.83 mg/kg and 2.35 mg/kg at the approximate seven (7) to nine (9) foot and seven and one-half (7½) to ten (10) foot sample intervals at GP-12 and GP-13, respectively. The PCE concentration at the one (1) to three (3) foot sample at GP-29 is 0.377 mg/kg while PCE is not present at a concentration above its detection limit at the approximate seven (7) to nine (9) foot sample interval. The absence of PCE at the seven (7) to nine (9) foot interval at this location appears to indicate that the documented shallow PCE concentration at GP-29 is most likely from the release at 1681 N. Van Buren Street. The PCE concentrations in exceedance of its Groundwater Pathway RCL at GP-12 and GP-13 are most likely from the release at the former Comedy Club Café parcel.

The PCE concentrations in exceedance of its Groundwater Pathway RCL on the 1681 N. Van Buren Street parcel extend from the near surface soils to at least ten (10) feet along the northern property line. PCE concentrations in exceedance of its Groundwater Pathway RCL extends into the E. Brady Street right-of-way at SP-15 and SP-16 at approximate depths ranging from approximately two (2) to eighteen (18) feet. PCE is not present in the alley way at KB-12A, GP-14, SP-11, SP-12, SP-13, KB-30 and KB-32 at concentrations at or above its detection limit at approximate depths ranging from one (1) to fifteen (15) feet.

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Based on the analytical results of soil samples collected from the alleyway and the 615 E. Brady Street and 1681 N. Van Buren Street properties, it appears that the eastern extent of the TCE and PCE concentrations in exceedance of their Groundwater Pathway RCLs from the chlorinated solvent release at the former Comedy Club Café extend between GP-13 and GP-29 and GP-12 and GP-28 (See Figure 7A: Approximate Lateral Extent of Trichloroethene Impacted Soil above its Groundwater Pathway RCL and Figure 10A: Approximate Lateral Extent of Tetrachloroethene Impacted Soil above its Groundwater Pathway RCL).

Key Engineering Group (Key) collected seven (7) sub-slab vapor samples in the 1681 N. Van Buren Street structure on October 20, 2014, November 17, 2015 and April 28, 2018. The results of the vapor analysis indicate the presence of TCE at the northeast corner of the existing nail salon in October of 2014 at a concentration of one hundred seventeen (117) $\mu g/m^3$ which exceeds its current residential VRSL of seventy (70) $\mu g/m^3$. This concentration is below its current small commercial VRSL of two hundred ninety (290) $\mu g/m^3$. TCE was not detected at the other locations at concentrations in exceedance of its small commercial or residential VRSL. PCE is not present in the sub-slab vapor at concentrations in exceedance of its small commercial or residential VRSL at any of the sampled locations (See Table 4. Sub-slab Vapor and Indoor Air Analytical Results – 1681 N. Van Buren Street).

The WDNR requested an explanation of United's sampling methodology since a Photoionization Detector (PID) was not utilized during soil sample collection.

A PID was not effective in evaluating the presence of TCE and PCE at GP-35 and GP-36, specifically the TCE concentration of 1.71 mg/kg at the approximate sample interval of one (1) to two (2) feet at GP-36, during United's initial soil sampling event on September 12, 2017. This may be due to the age of the release and the relative density of the unconsolidated formation.

Subsequent soil samples were collected at depths based on the analytical results of the samples collected from the previous thirty six (36) borings, the WDNR case closure denial letters dated March 18, 2014 and December 21, 2016, the March 30, 2018 WDNR written request for additional information and discussions with the Project Manager (PM). It should be noted, that visual and olfactory observations did not indicate the presence of chlorinated solvents at any of the sampled locations.

The WDNR requested justification of the delineation of the vertical extent of the TCE and PCE impacted soil at GP-44 through GP-49.

The TCE and PCE Non-Industrial Contact RCL exceedances within the building footprint in the area of the former floor drains (GP-45) are estimated to extend from approximately three (3) feet to ten (10) feet due to the absence of TCE and PCE in the soil approximately eight (8) feet to the southeast in the immediately adjacent alleyway (GP-13) at concentrations in exceedance of their respective Non-Industrial Direct Contact RCLs from the near surface to approximately ten (10) feet.

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The TCE and PCE Groundwater Pathway RCL exceedances in the area of the former dry cleaning machine (GP-44) and the former floor drains (GP-45) are also estimated not to extend beyond ten (10) feet based on their absence at concentrations at or above their respective detection limits at the nine (9) to seven (7) foot interval at GP-29 located about twenty feet (20) feet to the east of GP-44 and GP-45.

The TCE Non-Industrial Contact RCL exceedance in the soil immediately west of the former commercial building and north of the duplex adjacent to the former potable water and natural gas lines (GP-48) are anticipated to extend from the near surface to approximately nine (9) or ten (10) feet due to the absence of TCE at a concentration at or above its detection limit at approximately nine (9) to ten (10) feet and fourteen (14) to fifteen (15) feet at GP-36 which is located approximately eleven (11) feet west of the former commercial building.

The depth of the cis-1,2-dichloroethene Groundwater Pathway RCL exceedances at the above referenced locations is anticipated to extend from the near surface soils to an approximate depth of ten (10) feet due to its absence at concentrations at or above its respective detection limits at or below this depth across the site.

It should be noted that the highest documented TCE, PCE and cis-1,2-dichloroethene concentrations at the site are located at the southwest corner of the property in the area of the former catch basin at approximately seven (7) to nine (9) feet. TCE, PCE and cis-1,2-dichloroethene are not present at concentrations at or above their detection limit at this location at about twelve (12) to thirteen (13) foot indicating downward migration of these compounds below eleven (11) feet in this formation has not occurred or is minimal and below any established RCLs. In addition, TCE and PCE are not documented at concentrations at or above their respective detection limits below ten (10) feet at the 1681 N. Van Buren Street property.

The WDNR requested the elevation of the combined sewer line and the floor drains within the building footprint. In addition, the WDNR requested that the floor drains, boring locations, depths, analytical results and the excavation details be provided in the previously submitted Geologic Cross Section.

The former floor drains extended to approximately two (2) feet below the former floor slab elevation. The top of the combined sanitary and storm sewer was located approximately seven (7) feet below the existing grade at the entrance to the western elevation of the structure (See Figure 16: Revised Geologic Cross Section).

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The WDNR requested a brief summary of the petroleum contamination identified on the property and an assessment of the associated risks. In addition, figures from previous submittals should be included to indicate where Direct Contact and Groundwater Pathway RCLs in the soil are exceeded.

During site re-development activities, a one thousand (1,000) gallon capacity UST was discovered approximately five (5) feet north and eight (8) feet east of the existing northeast corner of the duplex. The tank contained approximately five hundred (500) gallons of waste oil/sludge. A second UST, four thousand (4,000) gallons in capacity was discovered approximately thirty nine (39) feet north of the northeast corner of the duplex. The tank contained water and pea gravel and was assumed to formerly contain gasoline. On March 5 and 7, 2018, these USTs were removed from the subject property. Visual and olfactory observations indicated that releases from the tanks had occurred.

On March 5 and 7, 2018, approximately forty (40) tons of waste oil and gasoline impacted soil was excavated and stockpiled on site. The affected soil was placed on and covered with four (4) mil polyethylene sheeting. Petroleum impacted soil was excavated to approximately eleven (11) feet beneath the existing ground surface (bgs) in the area of the former four thousand (4,000) gallon tank. The resulting excavation measured approximately thirty (30) feet in length, ten (10) feet in width and nine (9) feet in depth. The native soils at this depth consist of very dense brown clayey silt to silty clay with varying amounts of sand and gravel. Groundwater was not encountered during the soil removal activities.

Petroleum affected soil was excavated to about nine (9) feet bgs in the area of the former one thousand (1,000) gallon tank. A concrete slab was encountered at this depth. The petroleum affected soil located in the sidewalls was removed laterally based on visual and olfactory observations. The resulting excavation measured approximately nine (9) feet in length by seven (7) feet in width by about seven (7) feet in depth. The excavated petroleum impacted soil consisted of grayish brown sand and gravel. Groundwater was not encountered during the soil removal activities.

Subsequent soil sampling beneath the former gasoline UST did not indicate the presence of any Petroleum Volatile Organic Compounds (PVOC) at concentrations at or above their respective detection limits. Naphthalene is present at all of the sampled locations at concentrations ranging from one hundred sixteen (116) to one hundred sixty five (165) µg/kg. These concentrations are below the Industrial and Non-Industrial Direct Contact and Groundwater Pathway RCLs established for naphthalene. Soil sampling was not performed beneath the waste oil tank due to the presence of the concrete slab which prohibited downward contaminant migration to depths greater than nine (9) feet bgs (See Figure 3: Excavation Limits and Closure Assessment Sample Location Map). United notified the WDNR of the releases on June 19, 2018. The WDNR opened a Leaking Underground Storage Tank (LUST) case (BRRTS #03-41-581665) on June 25, 2018.

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The remaining benzene, ethylbenzene, naphthalene and total xylene concentrations in the soil are indicated by Key as Figure B.4.c "Other" which are attached. A separate Case Closure – GIS Registry packet will be submitted for the LUST case.

Sincerely,

United Engineering Consultants, Inc.

Nicholas J. Anderson, P.E.

Nick Andorson

Staff Engineer

Timothy J. Anderson, P.E.

Timothy J. anderson

Principal

Attachments: Figure 7A: Approximate Lateral Extent of TCE Impacted Soil above its Groundwater Pathway RCL

Figure 10A: Approximate Lateral Extent of PCE Impacted Soil above its Groundwater Pathway RCL

Table 4. Sub-slab Vapor and Indoor Air Analytical Results – 1681 N. Van Buren Street

Figure 16: Revised Geologic Cross Section

Figure 3: Excavation Limits and Closure Assessment Sample Location Map

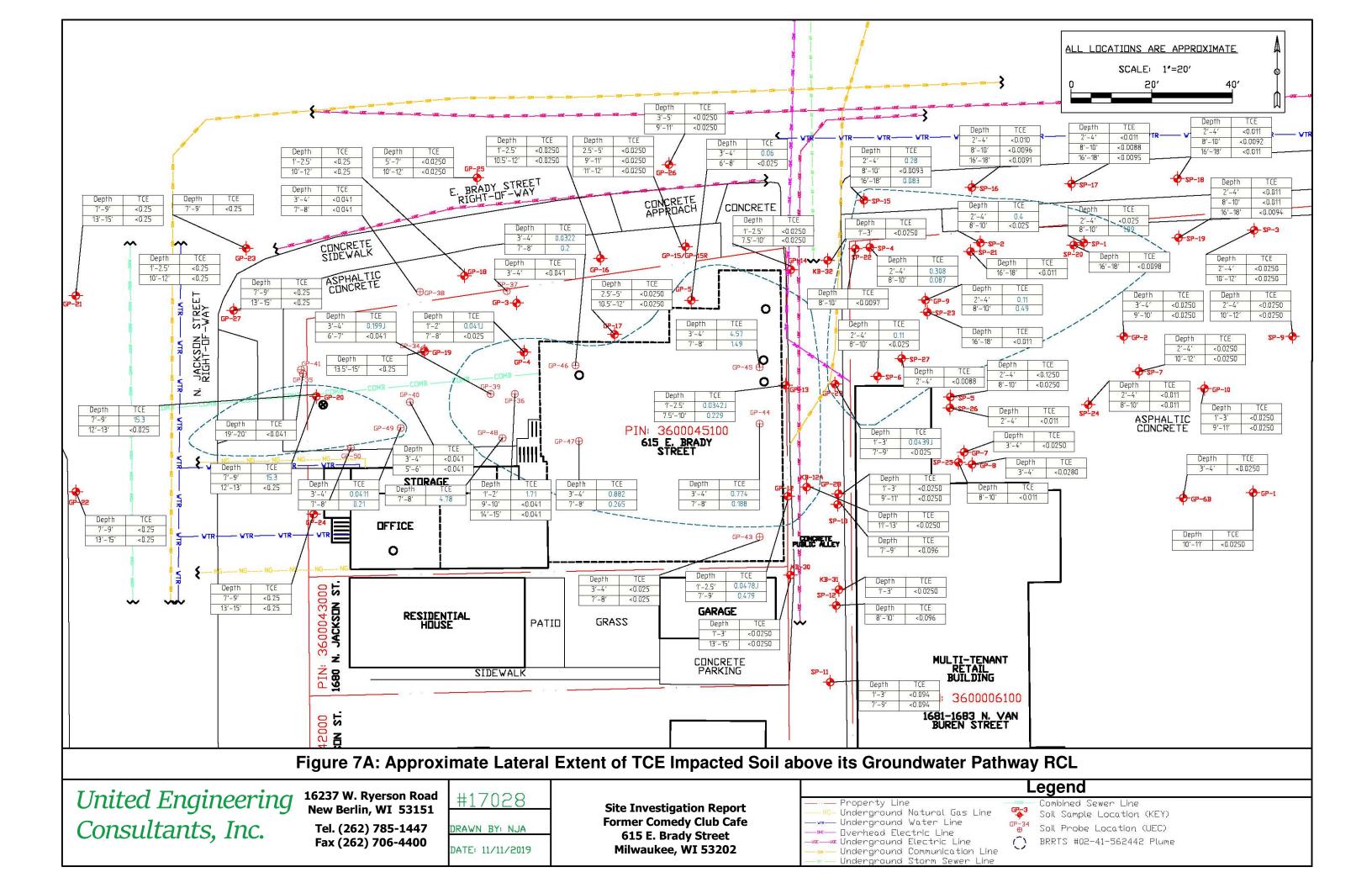
B.4.c Other Benzene in Soil

B.4.c Other Ethylbenzene in Soil

B.4.c Other Naphthalene in Soil

B.4.c Other Xylenes in Soil





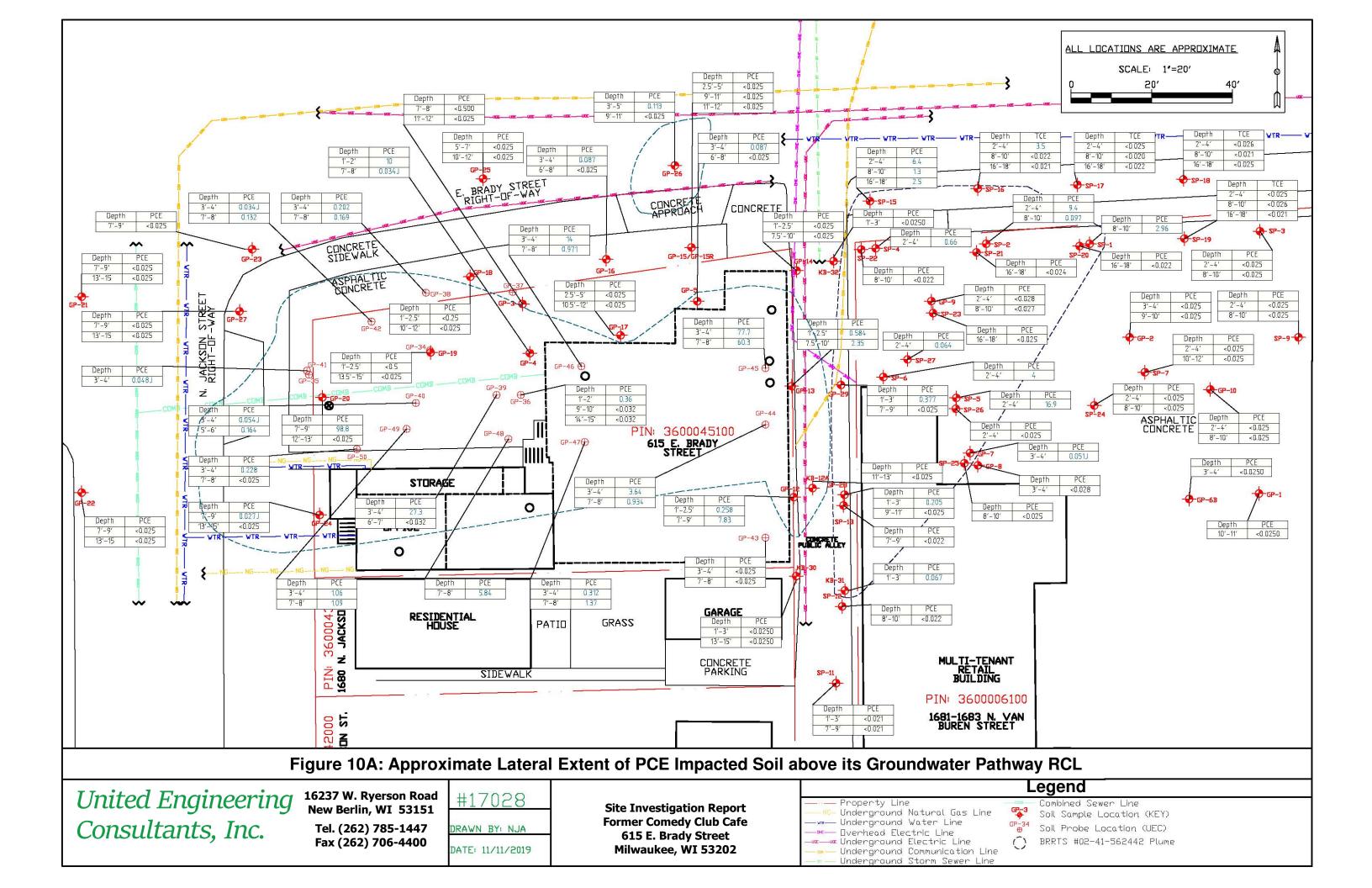


Table 4. Sub-slab Vapor and Indoor Air Analytical Results 1681 North Van Buren Street, Milwaukee, Wisconsin

Sample I.D. Sample Type - Sub-Slab (SS)/Near-Slab (NS) Duration of Sample Collection (hrs) Date Collected	Small Commerical Sub-Slab Vapor Risk Screening Level	Small Commerical Indoor Air Vapor Action Levels	VS-1 SS 0.5 10/20/2014	VS-2 SS 0.5 11/17/2015	VS-3 SS 0.5 11/17/2015	AS-1 IA 24 11/19/2014	VP-1 SS 0.5 4/28/2018	VP-2 SS 0.5 4/28/2018	VP-3 SS 0.5 4/28/2018	VP-4 SS 0.5 4/28/2018	IA-1 IA 8 4/28/2018												
												Detected VOCs (ug/m³)											
												Acetone	4,620,000	140,000	NA	NA	NA	23,100	1,340	1,780	971	1,440	40,200
												Benzene	528	16	NA	NA	NA	< 0.43	3.0	2.8	2.7	2.3	<0.21
2-Butanone (MEK)	726,000	22,000	NA	NA	NA	<1.0	20.3	65.2	16.0	22.0	802												
Carbon disulfide	102,300	3,100	NA	NA	NA	<0.26	< 0.39	2.3	<0.38	2.3	<0.30												
Chloroform	175	5.3	NA	NA	NA	< 0.66	3.8	2.4	< 0.34	< 0.35	4.1												
Chloromethane	12,870	390	NA	NA	NA	<0.70	<0.28	<0.28	<0.27	3.7	<0.21												
Cyclohexane	858,000	26,000	NA	NA	NA	< 0.46	< 0.63	7.6	6.9	< 0.63	<0.48												
Dichlorodifluoromethane	14,520	440	NA	NA	· NA	3.2 J	2.5	2.4	< 0.51	2.9	3.0												
cis-1,2-Dichloroethene	_	-	17	4.3	< 0.43	<0.72	< 0.39	< 0.39	<0.38	< 0.39	< 0.30												
trans-1,2-Dichloroethene	_		9.0	1.9	< 0.67	< 0.60	<0.51	< 0.51	<0.50	<0.51	< 0.39												
Ethanol			NA	NA	NA	1,510	326	97.2	156	233	1,240												
Ethyl acetate	10,230	310	NA	NA	NA	1,980	27.0	28.4	24.6	15.8	2,880												
Ethylbenzene	1,617	49	NA	NA	NA	< 0.66	7.1	5.7	6.8	5.1	1.8												
4-Ethyltoluene	-		NA	NA	NA	< 0.64	2.9 J	4.0 J	4.6	2.1 J	<0.78												
n-Heptane	_	_	NA	NA	NA	6.5 J	6.0	6.8	6.6	5.1	<0.52												
n-Hexane	102,300	3,100	NA	NA	NA	8.1	7.8	10.5	10.8	24.3	119												
2-Hexanone	4,290	130	NA	NA	NA	<0.78	<1.3	1.5 J	1.4 J	1.6 J	1.1 J												
Methylene Chloride	85,800	2,600	NA	NA	NA	23.2	8.2	11.5	5.6 J	202	13.4												
4-Methyl-2-pentanone (MIBK)	429,000	13,000	NA	NA	NA	75.4	5.7 J	2.0 J	6.8 J	1.2 J	11.0												
Naphthalene	119	3.6	NA	NA	NA	< 0.95	<2.4	<2.4	2.8 J	<2.4	<1.8												
2-Propanol			NA	NA	NA	< 0.34	388	239	205	391	9,490												
Styrene	145,200	4,400	NA	NA	NA	<0.50	<0.62	<0.62	0.97 J	<0.62	3.5												
Tetrachloroethene	5,940	180	322	347	147	15.8	287	221	49.4	146	72.9												
Tetrahydrofuran		_	NA	NA	NA	<0.51	6.3	266	10.5	69.0	<0.35												
Toluene	726,000	22,000	NA	NA	NA	7.9	11.3	10.2	10.7	10.2	18.0												
1,1,1-Trichloroethane	726,000	22,000	NA	NA	NA	<0.51	1.8 J	4.7	<0.54	1.4 J	<0.42												
Trichloroethene	290	8.8	117	44	1.4	<0.65	23.6	12.9	4.6	8.1	< 0.35												
Trichlorofluoromethane	102,300	3,100	NA	NA	NA	<0.51	1.4 J	1.5 J	<0.64	1.8 J	<0.50												
1,2,4-Trimethylbenzene	1,023	31	NA	NA	NA	<0.45	11.0	11.7	13.4	7.9	4.6												
1,3,5-Trimethylbenzene	_	-	NA	NA	NA	<0.76	3.6	<0.71	3.5	2.4	1.7												
m&p-Xylene	14,520	440	NA	NA	NA	<0.51	17.4	14.7	15.8	12.5	4.1												
o-Xylene	14,520	440	NA	NA	NA	<1.6	7.1	5.8	6.2	5.1	1.7												

Boxed values exceed indoor air vapor action levels

Bold values exceed sub-slab or near slab vapor risk screening levels

J - Concentration estimated

ug/m3 = Micrograms per cubic meter

All vapor samples collected into 6 liter Summa canisters

Vapor Action Levels based on USEPA Regional Screening Levels (RSLs), November 2014

Occupational Safety and Health Administration permissible exposure limit for ethyl actetate is 1,400,000 micrograms per cubic meter and found in nail polish remover.

^{- -} no target subslab vapor standard established

