State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

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Daniel L. Meyer, Secretary
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October 1, 2018

Bishop's Creek Community Development Corporation
Attn: Mr. Daren Daniels
3500 Mother Daniels Way
Milwaukee, WI 53209

Subject: Site Investigation Work Plan for 4759 North 32nd Street Milwaukee, WI
FID: 341055770 BRRTS: 02-41-306192, 02-41-553373, & 03-41-556393

Dear Mr. Daniels:

The DNR has reviewed the Site Investigation Work Plan (SWIP) for the Bishop's Creek Community Development Corporation dated September 13, 2017. This letter comments on the SWIP and requests additional information pertaining to the proposal to further evaluate the soil and groundwater contamination on this site. Additional information on the proposal may be required prior to approval. Attached to this letter is a Site Plan Map Figure 2 from Giles Engineering for reference to the items discussed below that includes Lot #3, former Building #3 footing spill excavation area (Drake 2008), and inferred limit of fuel oil release area (Building #1).

Building #1, Student Dormitory – Fuel Oil Spill

- Groundwater monitoring wells are proposed for two of the three soil boring locations using 1-inch diameter, prepacked well screens. In the Standard Operating Procedures (Page 1, in the submittal), 2-inch diameter screens are discussed. If 1-inch prepacked screens are going to be used, then request a variance per ch. NR 141, Wisconsin Administrative Code (WAC) and change the operating procedures. The operating procedures should indicate how the wells will be constructed using the 1-inch diameter prepacked screens for the proposed wells.
- Three soil boring locations are proposed for this location. Two soil samples per soil boring (six soil samples total) are proposed to be analyzed. The depths where these soil samples are to be taken is unknown but is based on PID/FID screenings. PID/FID screenings within the first zero to two, and two to four feet from the surface are important to evaluate if soil at these depths should be sampled and analyzed for potential direct contact and soil to groundwater pathway issues. The proposal should discuss how the first four feet will be evaluated for potential soil sampling and at what depth the second soil sample will be taken.
- The proposal indicates chemical analysis for petroleum volatile organic compounds (PVOCs), naphthalene, and polycyclic aromatic hydrocarbons (PAHs) in soil for the three soil borings. The DNR recommends RCRA metal soil analysis in addition to the proposed PVOCs, naphthalene, and PAHs because of historical soil and groundwater contamination from lead, arsenic, cadmium, and chromium at the former tannery site. The proposal should be revised to include RCRA metals at the three-soil boring/monitoring well locations.
- The proposed two groundwater sampling events didn't include RCRA metals and volatile organic compounds (VOCs) along with the PVOCs and naphthalene. VOC sampling is recommended to rule out any contamination from chlorinated volatile organic compound (CVOC) contamination from the tetrachloroethene (PCE) and trichloroethene (TCE) spill at the former Building #3 area. Include RCRA metals because of groundwater contamination from metals at the site.
- The proposal didn't address any vapor intrusion pathway assessment for Building #1. The proposal only discussed the installation of a single subslab vapor sampling port, soil sampling of the three soil borings, and groundwater monitoring installation and sampling. The proposal didn't explain how the data will be evaluated for any potential vapor intrusion based on the results.

BCCDC
4759 N. 32nd St.
Milwaukee, WI
FID: 341055770
BTTRS: 0241306192, 0241553373, & 0341556393

Building #3 South Footing Line CVOCs Area

- The proposal didn't address how the vapor pathway assessment will be conducted at the former Building #3, where there occurred a PCE/TCE discharge from a formerly unknown underground pipe. The assessment should include the groundwater information from the installed monitoring well and former confirmation soil samples from the excavation area.
- The RCRA metals analysis should include cadmium and chromium for the soil and groundwater sample because of known soil and groundwater contamination on the site.
- The groundwater monitoring well should not be abandoned as presented in the proposal. The results may determine if additional site investigation or additional groundwater monitoring will be required at this monitoring point or in conjunction with the groundwater sampling of Northern Lot #3.

Northern Lot #3

- Existing buildings 7 and 8 are in Lot #3 and are considered part of the site investigation. The proposal didn't address sampling of the buildings for potential releases. For example, previous site building inspections by the DNR and EPA in these two buildings and the former tannery buildings had catch basins and drains in the basement floors. These are avenues for releases into the soil and groundwater beneath the buildings. The proposal should address these buildings.
- As in the Building #1 location discussed above, the soil sampling proposal should explain the how the first four feet will be assessed for potential direct contact and soil to groundwater issues and where the additional soil sample will be taken in the soil borings.
- Cadmium and chromium should be included in the RCRA metals analysis from both soil and groundwater samples.
- The groundwater wells shouldn't be abandoned until a determination is made whether these wells may be used in any subsequent or expanded site investigation that may be required based on the data results.

Have Giles Engineering revise the SWIP and submit for approval. Additional site investigation for the site may be required to complete per ch. NR 716, WAC, site investigation, depending on the results of this site investigation work plan.

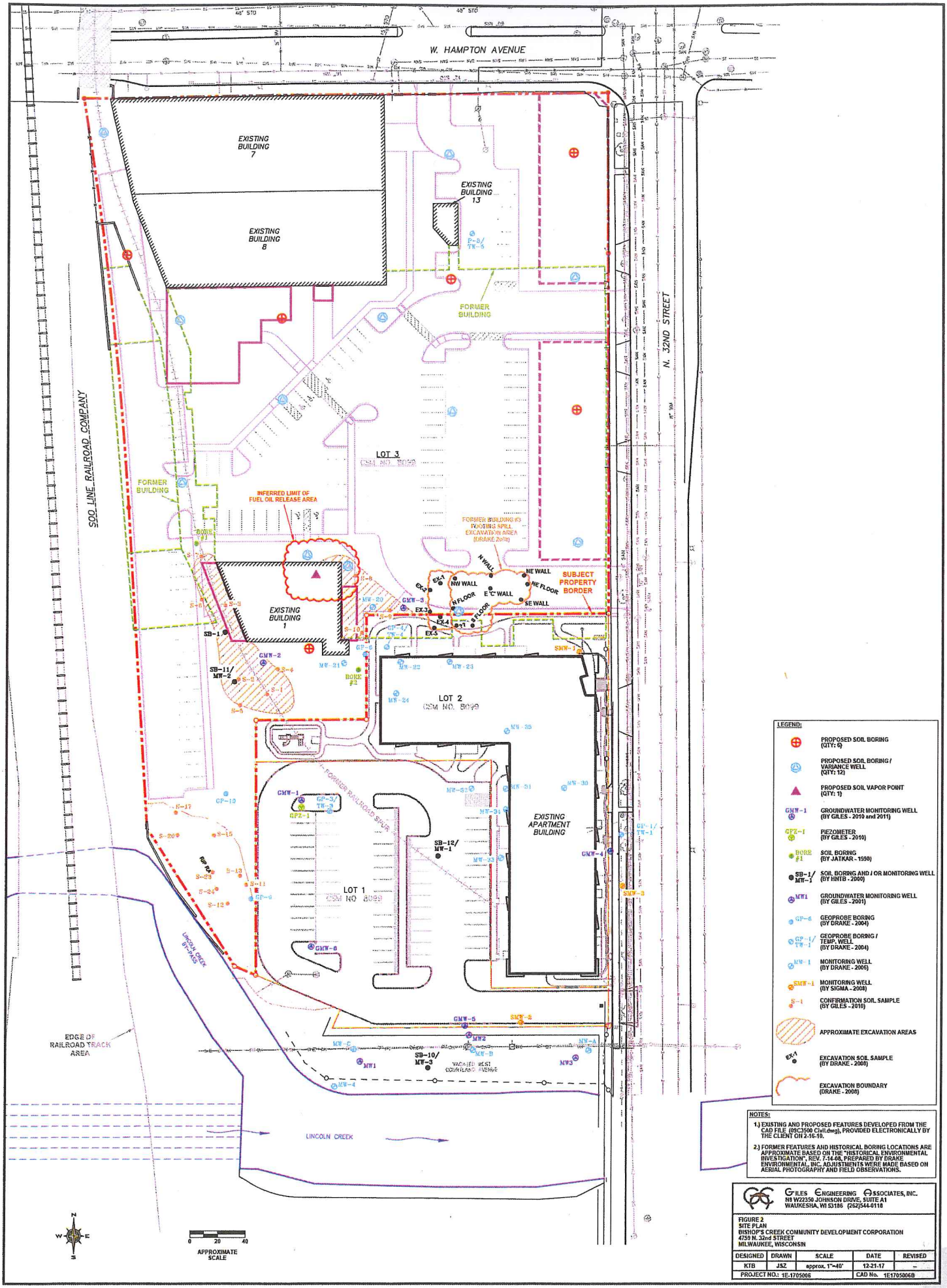
The Department appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at the above address or at (414) 263-8644, or at, john.hnat@Wisconsin.gov. Please refer to the FID number at the top of this letter in any future correspondence. Future correspondence should be sent directly to the Remediation and Redevelopment Program Assistant Jennifer Dorman (414-263-8683) at the above address.

Sincerely,

John J. Hnat, P.G., C.P.G.
Project Manager\Hydrogeologist
Southeast Region
Remediation and Redevelopment Program

Attached: Figure 2, Site Plan, Bishop's Creek Community Development Corporation 4759 North 32nd Street Milwaukee, Wisconsin, dated 12.21.17

C: Bradley J. Motl – Wisconsin DOJ, email
Kevin Bugel – Giles Engineering
WDNR SER Files


W. HAMPTON AVENUE
N. 32ND STREET
SOO LINE RAILROAD COMPANY
EXISTING BUILDING 7
EXISTING BUILDING 8
EXISTING BUILDING 13
FORMER BUILDING
FORMER BUILDING
LOT 3
CSM NO. 8029
INFERRED LIMIT OF FUEL OIL RELEASE AREA
FORMER BUILDING #3 FUELING SPILL EXCAVATION AREA (DRAKE 2006)
SUBJECT PROPERTY BORDER
EXISTING BUILDING 1
LOT 2
CSM NO. 8029
LOT 1
CSM NO. 8029
EXISTING APARTMENT BUILDING
FORMER RAILROAD SPUR
LINCOLN CREEK BYPASS
EDGE OF RAILROAD TRACK AREA
VACATED WEST COURTLAND AVENUE
LINCOLN CREEK
APPROXIMATE SCALE
0 20 40
LEGEND:
PROPOSED SOIL BORING (QTY: 6)
PROPOSED SOIL BORING / VARIANCE WELL (QTY: 12)
PROPOSED SOIL VAPOR POINT (QTY: 1)
GMW-1 GROUNDWATER MONITORING WELL (BY GILES - 2010 and 2011)
GPZ-1 PIEZOMETER (BY GILES - 2010)
BORE #1 SOIL BORING (BY JATKAR - 1990)
SB-1 / MW-1 SOIL BORING AND / OR MONITORING WELL (BY HNTB - 2000)
MW1 GROUNDWATER MONITORING WELL (BY GILES - 2001)
GP-6 GEOPROBE BORING (BY DRAKE - 2004)
GP-1 / TW-1 GEOPROBE BORING / TEMP. WELL (BY DRAKE - 2004)
MW-1 MONITORING WELL (BY DRAKE - 2006)
SMW-1 MONITORING WELL (BY SIGMA - 2008)
S-1 CONFIRMATION SOIL SAMPLE (BY GILES - 2010)
APPROXIMATE EXCAVATION AREAS
EX-1 EXCAVATION SOIL SAMPLE (BY DRAKE - 2008)
EXCAVATION BOUNDARY (DRAKE - 2008)
NOTES:
1.) EXISTING AND PROPOSED FEATURES DEVELOPED FROM THE CAD FILE (09C3500 Civil.dwg), PROVIDED ELECTRONICALLY BY THE CLIENT ON 2-16-10.
2.) FORMER FEATURES AND HISTORICAL BORING LOCATIONS ARE APPROXIMATE BASED ON THE "HISTORICAL ENVIRONMENTAL INVESTIGATION", REV. 7-14-08, PREPARED BY DRAKE ENVIRONMENTAL, INC. ADJUSTMENTS WERE MADE BASED ON AERIAL PHOTOGRAPHY AND FIELD OBSERVATIONS.
GILES ENGINEERING ASSOCIATES, INC.
N9 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)544-0118
FIGURE 2
SITE PLAN
BISHOP'S CREEK COMMUNITY DEVELOPMENT CORPORATION
4759 N. 32nd STREET
MILWAUKEE, WISCONSIN
DESIGNED KTB | DRAWN JSZ | SCALE approx. 1"=40' | DATE 12-21-17 | REVISED –
PROJECT NO.: 1E-1705006 | CAD No. 1E1705006B