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

Form 4400-237 (R 12/18)

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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 Open 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 from 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: <u>dnr.wi.gov/topic/Brownfields/Pubs.html</u>.

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.

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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								
Detzer	Tim		Milwaukee County DAS-FM-AE&ES								
Mailing Address			City	State	ZIP Code						
633 W. Wisconsin Ave, Suite	1003		Milwaukee WI 5.								
Phone # (include area code)	Fax # (include area code)		Email								
(414) 278-2988			timothy.detzer@milwaukeecountywi.gov								
The requester listed above: (selec	et all that apply)										
\bigotimes Is currently the owner		[Is considering selling the Property								
Is renting or leasing the Pro	operty	[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 b	be contacted with questions	this request)	Selec	t if san	ne as requester							
Contact Last Name	First	MI	Organization/ Business Na	ame								
Juno	Katherine	Μ	LF Green Development, LLC									
Mailing Address		City		State ZIP Coo								
5600 W Brown Deer Road	d, Suite 104	Milwaukee		WI	53223							
Phone # (include area code)	Fax # (include area code)	Email										
(262) 719-4501			katejuno@lfgreendevelopment.com									
Environmental Consult	ant (if applicable)											
Contact Last Name	First	MI	Organization/ Business Na	ime								
Juno	Katherine	Μ	LF Green Development	, LLC								
Mailing Address	•	City		State	ZIP Code							
5600 W Brown Deer Road	d, Suite 104	Milwaukee	WI	53223								
Phone # (include area code)	Fax # (include area code)	Email			-							
(262) 719-4501			katejuno@lfgreendevelopment.com									
Section 2 Property Inform	ation											
Property Name	auon			FID No. (if	knowr	ו)						
2736 W LAYTON AVEN	IUE PROPERTY		241439990									
BRRTS No. (if known)			Parcel Identification Number									
02-41-558578		5998891000										
Street Address		City State ZIP Code										
2736 W Layton Avenue		Greenfield WI 532										
County	Municipality where the Property	' is loc	cated Property is composed of: Property Size Acres									
Milwaukee	● City ○ Town ○ Village of	Milv	vaukee Sing	le tax O Multiple ta	ax 0							

Technical Assistance, Environmental Liability t

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	Clarification or Post-Closure M Form 4400-237 (R 12/18)	Odification Request
1. Is a response needed by a specific date? (e.g., plan accordingly.	Property closing date) Note: Most requests are complete	d within 60 days. Please
🖲 No 🔾 Yes		
Date requested by:		
Reason:		
 2. Is the "Requester" enrolled as a Voluntary Party No. Include the fee that is required for you Yes. Do not include a separate fee. This reprint the separate fee. 	y in the Voluntary Party Liability Exemption (VPLE) progra our request in Section 3, 4 or 5. request will be billed separately through the VPLE Progra	am? Im.
Fill out the information in Section 3, 4 or 5 w Section 3. Technical Assistance or Post-C Section 4. Liability Clarification; or Sectio	which corresponds with the type of request: Slosure Modifications; In 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) (Immedite to an immediate action after a discharge Review of Site Investigation Work Plane 	iate Actions) - NR 708.09, [183] - Include a fee of \$350 e of a hazardous substance occurs. Generally, these are - NR 716.09, [135] - Include a fee of \$700.	 Use for a written response for a one-time spill event.
Review of Site Investigation Report - NF	R 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 \$10)50.
Review of a Remedial Action Options R	eport - NR 722.13, [143] - Include a fee of \$1050.	
Review of a Remedial Action Design Re	eport - NR 724.09, [148] - Include a fee of \$1050.	
Review of a Remedial Action Document	tation 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).

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].

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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

• 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 ¹/₄, ¹/₄ 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.

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.

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: <u>dnr.wi.gov/topic/Brownfields/lgu.html#tabx4</u>.

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.

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.

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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: See attached work plan date	red June 22, 2022									
For Property with newly identified discharges of hazardous substances only: H been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?	as a notification of a discharge of a hazardous substance									
○ Yes - Date (if known):										
○ No										
Note: The Notification for Hazardous Substance Discharge (non-emergency) <u>dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf</u> .	form is available at:									
Section 7. Certification by the Person who completed this form										
I am the person submitting this request (requester)										
\boxtimes I prepared this request for: Milwaukee County										
Requester Name										
I certify that I am familiar with the information submitted on this request, and th true, accurate and complete to the best of my knowledge. I also certify I have t this request.	at the information on and included with this request is he legal authority and the applicant's permission to make									
Kothai Milan	lune 22 2022									
Signature	Date Signed									
Professional Geologist	(262) 719-4501									

Title

Telephone Number (include area code)

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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 <u>DNR regional brownfields specialist</u> 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.



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 Department of Natural Resources 2300 North Martin Luther King Drive Milwaukee WI 53212

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 Co			omments								
Fee Enclosed?	Fee Amount		Date Additional Information Requested	Date Requested for DNR Response Letter							
🔿 Yes 🔵 No	\$										
Date Approved	Final Determination										



June 22, 2022

Mr. Riley Neumann Hydrogeologist Wisconsin Department of Natural Resources 2300 N Martin Luther King Dr Milwaukee WI 53212

Re: NR 716 Site Investigation Work Plan 2736 W. Layton Avenue Greenfield, Wisconsin 53221 Tax Key # 5998891000 BRRTS# 02-41-558578; FID # 241439990

Dear Riley:

LF Green Development, LLC (LF Green) has prepared this Site Investigation Work Plan based on the results of soil sampling completed for the industrial property located at 2736 W. Layton Avenue, Greenfield, Wisconsin (the "Site"). This scope of work is based on the findings of the Phase II Environmental Site Assessment (ESA) completed in 2021. Additional investigation is necessary to define the horizontal and vertical extent of contamination. The following summarizes the site background, scope of work, project findings, conclusions, and a proposed scope of work.

BACKGROUND INFORMATION

The Site is developed with a single-story brick building with a partial basement, located on the south portion of the property. The onsite structure was built in 1967 for specific use as a drycleaner. The building is situated on a parcel which is 0.14-acres in size. The site location is presented as **Figure 1**.

- The onsite structure is not currently occupied and was utilized as a dry cleaner as early as 1967 and a furniture refinishing business as late as 2011. The dry-cleaning facility was a very small quantity hazardous waste generator (WID988606307) of F002, spent halogenated solvents.
- This Subject Site is identified on the Wisconsin Department of Natural Resources (WDNR) Bureau for Remediation and Redevelopment Tracking System (BRRTS) as an Environmental Repair Program (ERP) site (BRRTS# 02-41-558578) opened in March 2012. Chlorinated volatile organic compounds (CVOCs) were detected in shallow soil samples submitted for analysis at concentrations exceeding NR 720 residual contaminant levels (RCLs). The magnitude and extent of contamination has not been defined.

- Milwaukee County acquired the property through tax delinquency foreclosure proceedings in 2017. WDNR has determined that Wis. Stat. sec. 292.11(9)(e) local government unit (LGU) environmental liability exemption in effect for this property. The LGU exemption protects LGUs from investigation and clean up responsibilities, unless the spill is caused by an action taken by the LGU. Milwaukee County is voluntarily undertaking this site investigation.
- A Phase II assessment was completed in 2021 and included five soil probes (**Figure 2**). Soil samples were analyzed for VOCs and found dry-cleaning constituents and related breakdown products including tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichlorotehene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE) at concentrations exceeding NR 720 Residual Contaminant Levels. Groundwater was not encountered but is likely impacted based on the high levels of VOCs detected at depth in the soil column. Significant levels of VOCs were detected down to 20 feet bgs, and groundwater is expected to occur at approximately 25 feet bgs.
- Significant concentrations of VOCs were detected in soils from the surface to well below the foundation depths of the adjacent structures, indicating that adjacent occupied structures are at significant risk for vapor intrusion. WDNR has made several attempts to gain access to neighboring residential structures east and west of the Subject Site (2730 and 2744 W. Layton Avenue, respectively) for the purpose of obtaining sub-slab and indoor air vapor samples to evaluate the risk of vapor intrusion into these structures. The east adjacent residential structure (2730 W. Layton Avenue) is situated approximately five feet from the Subject Site structure.

Site contacts include the following:

Tim Detzer Principal Environmental Engineer Milwaukee County DAS-FM-AE&ES 633 W. Wisconsin Ave, Suite 1003 Milwaukee, WI 53203 Direct (414) 278-2988 Cell (414) 550-0852 timothy.detzer@milwaukeecountywi.gov



SUMMARY OF FINDINGS

Subsurface Conditions

Soil borings generally encountered stiff clay soils with increasing density with depth. The Geoprobe could not advance greater than 20 feet below the ground surface due to these dense clay soils. Neither groundwater nor evidence of groundwater such as sand lenses or grey soils were encountered within the soil borings. Groundwater is suspected to occur at a depth of approximately 25 feet bgs based on the findings of the Phase II borings and neighboring investigations east of the Subject Site.

Site Topography and Surrounding Area

The Site is located in a mixed use neighborhood on the north side of Layton Avenue. Single-family residential structures with basements are situated east and west of the Site. As indicated above, the east adjacent residential structure (2730 W. Layton Avenue) is situated approximately five feet from the Subject Site structure.

The property north of the Site is occupied by a parking lot serving a large commercial structure to the northeast. The area of contamination, generally at elevation 730 msl, slopes gently north then sharply north- northeast toward the parking lot, which is at an elevation approximately 8 to 10 feet lower than the Site. Groundwater flow is anticipated to follow surface topography, and northeasterly groundwater flow was found on the Shell Station site (BRRTS #03-41-000748) situated east of the Subject Site adjacent to the corner of South 27th Street and Layton Avenue.

Soil Analytical Results

Soil laboratory analytical results are summarized in **Table 1**, which includes a comparison of detected compounds relative to NR 720 residual contaminant levels (RCLs). **Figure 2** depicts the PCE and TCE concentrations and sample depths at each boring location.

- PCE, a primary dry cleaning solvent, was detected in samples collected from LFSB1 through LFSB4 in both shallow soils and at depth within the soil column at concentrations well above RCLs.
- TCE, associated with PCE as a biodegradation daughter product, was found at lesser concentrations in these same borings in proportion to PCE. TCE may also be associated with furniture refinishing solvents, but the absence of other petroleum-type VOCs and the depth of TCE impacts suggests that the TCE source is derived from PCE.
- Cis-1,2-DCE and trans-1,2-DCE were detected above their respective soil to groundwater migration pathway RCLs in samples collected from LFSB3, where the highest concentrations of PCE were detected. These compounds are degradation products of PCE and TCE.



Mr. Riley Neumann Site Investigation Work Plan June 22, 2022

- Lead was detected slightly above its Background Threshold Value (BTV) in a shallow soil sample collected from LFSB1, therefore exceeding the soil to groundwater migration pathway RCL. No other metals were detected above their BTVs or RCLs. The proximity of LFSB1 to the building in shallow soil suggests that the lead detected may related to lead-based paint flaking from the structure over time.
- PAHs were detected in the shallow soil sample collected from LFSB3 at concentrations exceeding soil to groundwater migration pathway and non-industrial direct contact RCLs and may be associated with spent dry cleaning solvent.

EMERGING CONTAMINANTS

Per - and Polyfluoroalkyl substances (PFAS) have been used in a variety of commercial products since the 1940s, including stain and water repellents used in textile applications. Stain-resistance chemicals containing PFAS are known to have been used in the dry-cleaning industry; therefore, it is possible that the facility may have used stain-resistance chemicals or may have cleaned items previously treated with these chemicals. Based on this finding, the site investigation will include sampling for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS).

No petroleum constituents were detected in the soil samples, indicating that Stoddard Solvent was not used at the facility. Based on these findings, the primary dry-cleaning solvent used at the facility consisted of PCE, and sampling and analysis of n-nonane, a constituent of Stoddard Solvent, is not warranted for this Site.

PROPOSED SCOPE OF WORK

Additional investigation is necessary to define the horizontal and vertical extent of contamination, and will include soil borings, monitoring wells, and sub-slab vapor sampling. Proposed soil boring and monitoring well locations are depicted on the attached **Figure 2**.

<u> Site Investigation – Subject Site</u>

Our site investigation scope of work is proposed to include the following elements:

- Install four monitoring wells in accordance with NR 141 requirements. Monitoring wells will be extended up to approximately 30 to 35 feet below ground surface.
- Install up to five additional soil borings to depths of 15 feet to define the horizontal extent of soil contamination.
- Subject soil samples to field vapor screening using a photoionization detector (PID) and observe samples for strong odors, staining, or other evidence of hazardous substances.



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- Collect soil samples in laboratory-provided jars as required by WDNR guidance documents. All samples will be stored in a cooler with ice and maintained at a temperature of approximately 4° Celsius until delivered under chain-of-custody procedures to laboratory personnel. Samples will be shipped to Pace Analytical (Green Bay, Wisconsin) for analysis.
- Submit soil samples for laboratory analysis of VOCs, PFOA and PFOS.
- Abandon soil borings where monitoring wells are not installed in accordance with NR 141.
- Develop and sample monitoring wells for VOCs, with sampling for PFOA and PFOS if these compounds are detected in soil.
- Collect two sub-slab vapor samples from the basement floor of the on-site building and compare results to vapor risk screening levels (VRSLs). The vapor probes will be installed near the northeast corner and east wall of the basement. This data will be used to evaluate the potential for vapor intrusion into the east adjacent residential building.

Vapor Assessment -Adjacent Properties

Significant concentrations of VOCs were detected in soils from the surface to well below the foundation depths of the adjacent structures, indicating that adjacent occupied structures are at significant risk for vapor intrusion. WDNR made several attempts to gain access to the adjacent residences to evaluate vapor intrusion. LF Green will prepare initial access letter to the property owners and a follow-up letter approximately 30 days thereafter if the property owner doesn't respond the first time. If the property owner does not respond or refuses access to his building, we will notify WDNR, and no vapor samples will be obtained from the buildings

Because we don't know the exact layout of the buildings (basements, crawl spaces, etc), we have not prepared a scope to actually do the vapor sampling in these buildings. If we do obtain an access agreement with these adjacent property owners, we will prepare and submit a brief vapor sampling scope at that time.

Investigative Waste

All soil cuttings generated during the investigative activities will be left onsite within the Subject Site building for future management and disposal in accordance with WDNR guidance for management of investigative waste. Groundwater purge and development water will be containerized in drums and sampled for total VOCs to determine if groundwater may be discharged to the sanitary sewer.

Site Investigation Report

A site investigation report will be prepared in accordance with NR 716. The report will include tables, figures, methodology, and all laboratory data. The report will include all certifications as required by NR 712.



Mr. Riley Neumann Site Investigation Work Plan June 22, 2022

Remedial Action Options Report

Remedial alternatives for the site will be evaluated and a Remedial Action Options Report will be developed in accordance with NR 722. Remedial options evaluated will consider means and methods to reduce contaminant source areas identified.

SCHEDULE

LF Green, on behalf of Milwaukee County, will contact owners of the neighboring residential structures east and west of the Subject Site (2730 and 2744 W. Layton Avenue, respectively) for the purpose of obtaining sub-slab and indoor air vapor samples to evaluate the risk of vapor intrusion into these structures. Soil and groundwater sampling will proceed in late summer pending WDNR approval of this work plan.

Thank you for your assistance with this matter. If you have any questions or comments, please feel free to contact us.

Sincerely,

LF Green Development, LLC

Greda J. Fellenny

Linda J. Fellenz President

Katherine M. Juno Katherine M. Juno, PG

I, KATHERINE M. JUNO, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Attachments:	Figures:

Table:

Figure 1 Site Location Figure 2 Soil Boring Locations (2020 Aerial Photograph) Table 1 Soil Analytical Results





FIGURES

Figure 1 Site Location Local Topograpy Map







Figure 2 Soil Boring Locations





TABLE

Table 1 - Soil Analytical Summary 2736 W. Layton Avenue Greenfield, Wisconsin

Soil Sample Location			Non-		LFSB1				LFSB2			LFSB3			LFSB4			LFSB5			
Sam	ple Depth (feet bas)		Industrial Direct	Industrial	Background	2-4'	6-8'	10-12'	18-20'	2-4'	6-8'	18-20'	4-6'	6-8'	10-12'	4-6'	6-8'	16-18'	4-6'	6-8'	10-12'
	unde Optie (root age)	Groundwater	Contact RCL	Direct	Threshold Value	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021	10/25/2021
Sam	iple Collection Date	Pathway RCL		Saturated (S) or Unsaturated (U)			11	11				11		11	11		11			11
	i i			Exceeds	Industrial DC RCI	0	0	0	0	0	0	0	x	0	0	0	0	0	0	0	0
Analyte	Units			Exceeds Non	-Industrial DC RCL		x	Х	х		х		X	х	х						
.,			<u>E:</u>	kceeds Ground	water Pathway RCL	Х	х	Х	Х	Х	Х	Х	Х	Х	Х	Х		Х			
RCRA Metals																					
Arsenic	mg/kg	0.584	3	0.677	8	5.4	-	-	-	5.6J	-	-	<3.3	-	-	-	-	-	-	-	-
Barium	mg/kg	<u>164.8</u>	100,000	15,300	364	94.3	-	-	-	122	-	-	53.9	-	-	-	-	-	-	-	-
Cadmium	mg/kg	0.752	985	71	1	0.41J	-	-	-	< 0.30	-	-	<0.30	-	-	-	-	-	-	-	-
Chromium	mg/kg	360,000	100,000	100,000	44	26.1	-	-	-	42.3	-	-	24.6	-	-	-	-	-	-	-	-
Lead	mg/kg	27	800	400	52	<u>58.9</u>	-	-	-	13.5	-	-	16.6	-	-	-	-	-	-	-	-
Silver	mg/kg	0.849	5,840	391		<1.4	-	-	-	<3.0	-	-	<2.9	-	-	-	-	-	-	-	-
Mercury	mg/kg	0.208	3.13	3.13		<0.34	-	-	-	<0.70	-	-	<0.68	-	-	-	-	-	-	-	-
Volatile Organic Compounds (VOCs)																					
Chloroethane	µg/kg	226.6	2,120,000	2,120,000		<25.3	<30.9	<30.9	<29.5	<26.9	<29.5	<28.5	<28.5	<29.8	<28.6	<28.6	<31.9	<29.4	<27.8	<29.0	<29.0
Chloroform	µg/kg	3.33	1,980	454		<43.0	<52.4	<52.4	<50.0	<45.6	<50.0	<48.4	<48.4	<50.5	<48.5	<48.6	<54.1	<49.8	<47.2	<49.2	<49.2
Chloromethane	µg/kg	15.5	669,000	159,000		<22.8	<27.8	<27.8	<26.5	<24.2	<26.6	<25.7	<25.7	<26.8	<25.8	<25.8	<28.7	<26.4	<25.0	<26.1	<26.1
Dibromochloromethane	µg/kg	31.95	38,900	8,280		<205	<250	<250	<239	<218	<239	<231	<231	<241	<232	<232	<258	<238	<225	<235	<235
1,2-Dibromoethane (EDB)	µg/kg	0.028	221	50		<16.4	<20.1	<20.1	<19.1	<17.4	<19.1	<18.5	<18.5	<19.3	<18.6	<18.6	<20.7	<19.1	<18.0	<18.8	<18.8
Dibromomethane	µg/kg	0.028	143,000	34,000		<17.8	<21.7	<21.7	<20.7	<18.8	<20.7	<20.0	<20.0	<20.9	<20.1	<20.1	<22.4	<20.6	<19.5	<20.3	<20.4
Dichlorodifluoromethane	µg/kg	3,086	530,000	126,000		<25.8	<31.5	<31.5	<30.0	<27.4	<30.0	<29.1	<29.1	<30.3	<29.1	<29.2	<32.5	<29.9	<28.3	<29.5	<29.6
1,1-Dichloroethane	µg/kg	483	22,200	5,060		<15.4	<18.7	<18.7	<17.9	<16.3	<17.9	<17.3	<17.3	<18.1	<17.4	<17.4	<19.4	<17.8	<16.9	<17.6	<17.6
1,2-Dichloroethane	µg/kg	2.84	2,870	652		<13.8	<16.8	<16.8	<16.1	<14.6	<16.1	<15.5	<15.6	<16.2	<15.6	<15.6	<17.4	<16.0	<15.1	<15.8	<15.8
1,1-Dichloroethene	µg/kg	5.02	1,190,000	320,000		<19.9	<24.3	<24.3	<23.2	<21.1	<23.2	<22.4	<22.4	<23.4	<22.5	<22.5	<25.1	<23.1	<21.9	<22.8	<22.8
cis-1,2-Dichloroethene (cis-1,2-DCE)	µg/kg	41.2	2,340,000	156,000		<12.8	<15.7	<15.7	<14.9	<13.6	<15.0	19.6J	234	30.2J	128	<14.5	<16.2	21.1J	<14.1	<14.7	<14.7
trans-1,2-Dichloroethene (trans-1,2-DCE)	µg/kg	62.6	1,850,000	1,560,000		<13.0	<15.8	<15.8	<15.1	<13.8	<15.1	<14.6	263	<15.2	<14.6	<14.6	<16.3	<15.0	<14.2	<14.8	<14.9
Ethylbenzene	µg/kg	1,570	35,400	8,020		<14.3	<17.4	<17.4	<16.6	<15.2	<16.6	<16.1	<16.1	<16.8	<16.1	<16.1	<18.0	<16.6	<15.7	<16.4	<16.4
Naphthalene	µg/kg	658	24,100	5,520		<18.7	<22.8	<22.8	<21.8	<19.9	<21.8	<21.1	<21.1	<22.0	<21.1	<21.2	<23.6	<21.7	<20.6	<21.4	<21.5
1,1,1,2-Tetrachloroethane	µg/kg	53.4	12,300	2,780		<14.4	<17.6	<17.6	<16.8	<15.3	<16.8	<16.2	<16.2	<16.9	<16.3	<16.3	<18.1	<16.7	<15.8	<16.5	<16.5
1,1,2,2-Tetrachloroethane	µg/kg	0.156	3,600	810		<21.7	<26.5	<26.5	<25.3	<23.1	<25.3	<24.5	<24.5	<25.5	<24.5	<24.6	<27.4	<25.2	<23.8	<24.9	<24.9
Tetrachloroethene (PCE)	µg/kg	4.54	145,000	33,000		24,700	75,700	45,200	69,800	<u>2,470</u>	37,200	32,100	164,000	57,500	99,000	<u>136</u>	<29.3	<u>105</u>	<25.6	<26.7	<26.7
Toluene	µg/kg	1,107	818,000	818,000		<15.1	<18.4	<18.4	<17.6	<16.0	<17.6	<17.0	<17.0	<17.8	<17.1	<17.1	<19.1	<17.5	<16.6	<17.3	<17.3
1,1,1-Trichloroethane	µg/kg	140.2	640,000	640,000		<15.4	<18.7	<18.7	<17.9	<16.3	<17.9	<17.3	<17.3	<18.1	<17.4	<17.4	<19.4	<17.8	<16.9	<17.6	<17.6
1,1,2-Trichloroethane	µg/kg	3.24	7,010	1,590		<21.8	<26.6	<26.6	<25.4	<23.2	<25.4	<24.6	<24.6	<25.7	<24.7	<24.7	<27.5	<25.3	<24.0	<25.0	<25.0
Trichloroethene (TCE)	µg/kg	3.58	8,410	1,300		24.1J	<u>65.0J</u>	<u>50.4J</u>	<u>413</u>	<23.8	<u>74.7</u>	<u>184</u>	<u>3,280</u>	<u>756</u>	<u>986</u>	<25.4	<28.3	<u>58.8J</u>	<24.6	<25.7	<25.7
Trichlorofluoromethane	µg/kg	4,477	1,230,000	1,230,000		<17.4	<21.2	<21.2	<20.2	<18.5	<20.3	<19.6	<19.6	<20.5	<19.7	<19.7	<21.9	<20.2	<19.1	<19.9	<19.9
Vinyl chloride (VC)	µg/kg	0.138	2,080	67		<12.1	<14.8	<14.8	<14.1	<12.9	<14.1	<13.7	<13.7	<14.3	<13.7	<13.7	<15.3	<14.1	<13.3	<13.9	<13.9
m&p-Xylene	µg/kg					<25.3	<30.9	<30.9	<29.5	<26.9	<29.5	<28.5	<28.5	<29.8	<28.6	<28.6	<31.9	<29.4	<27.8	<29.0	<29.0
o-Xylene	µg/kg					<18.0	<22.0	<22.0	<20.9	<19.1	<21.0	<20.3	<20.3	<21.2	<20.3	<20.3	<22.7	<20.9	<19.8	<20.6	<20.6
Polycyclic Aromatic Hydrocarbons (PAH	ls)																				
Acenaphthene	µg/kg		45,200,000	3,590,000		<2.4	-	-	-	<2.5	-	-	281J	<2.5	-	-	-	-	-	-	-
Acenaphthylene	µg/kg					3.0J	-	-	-	<2.4	-	-	<124	<2.4	-	-	-	-	-	-	-
Anthracene	µg/kg	196,949	100,000,000	17,900,000		5.4J	-	-	-	2.5J	-	-	1560	<2.4	-	-	-	-	-	-	-
Benzo(a)anthracene	µg/kg		20,800	1,140		19.6	-	-	-	15.7J	-	-	2,250	<2.5	-	-	-	-	-	-	-
Benzo(a)pyrene	µg/kg	470	2,110	115		10.9J	-	-	-	18.4J	-	-	<u>1,790</u>	<2.2	-	-	-	-	-	-	-
Benzo(b)fluoranthene	µg/kg	479	21,100	1,150		88	-	-	-	29.1	-	-	2,530	<2.6	-	-	-	-	-	-	-
Benzo(g,h,i)perylene	µg/kg					38.7	-	-	-	14.5J	-	-	1,210	<3.3	-	-	-	-	-	-	-
Benzo(k)fluoranthene	µg/kg		211,000	11,500		22.6	-	-	-	11.8J	-	-	1,040	<2.4	-	-	-	-	-	-	-
Chrysene	µg/kg	144.6	2,110,000	115,000		49.2	-	-	-	23.3	-	-	<u>2,360</u>	4.5J	-	-	-	-	-	-	-
Dibenz(a,h)anthracene	µg/kg		2,110	115		11.4J	-	-	-	3.9J	-	-	321J	<2.6	-	-	-	-	-	-	-
Fluoranthene	µg/kg	88,878	30,100,000	2,390,000		26.9	-	-	-	32.6	-	-	6,060	2.7J	-	-	-	-	-	-	-
Fluorene	µg/kg	14,830	30,100,000	2,390,000		<2.2	-	-	-	<2.3	-	-	433J	<2.3	-	-	-	-	-	-	-
Indeno(1,2,3-cd)pyrene	µg/kg		21,100	1,150		31.2	-	-	-	12.2J	-	-	1,050	<4.0	-	-	-	-	-	-	-
1-Methylnaphthalene	µg/kg		72,700	17,600		5.0J	-	-	-	<2.8	-	-	<143	<2.8	-	-	- 1	-	-	-	-
2-Methylnaphthalene	µg/kg		3,010,000	239,000		8.0J	-	-	-	<2.8	-	-	<144	<2.8	-	-	-	-	-	-	-
Naphthalene	µg/kg	658	24,100	5,520		8.7J	-	-	-	2.0J	-	-	<95.7	2.3J	-	-	-	-	-	-	-
Phenanthrene	µg/kg					11.8J	-	-	-	12.6J	-	-	4,620	2.5J	-	-	- 1	-	-	-	-
Pyrene	µg/kg	54,545	22,600,000	1,790,000		21.2	-	-	-	24.4	-	-	3,940	4.8J	-	-	- 1	-	-	-	-
NOTES																					

Bold and boxed font indicates result exceeds Industrial Direct Contact RCL

Bold font indicates result exceeds Non-Industrial Direct Contact RCL

Italics and underline font indicates result exceeds Groundwater RCL

NR 720 RCLs are applicable to metals that exceed their BTV

- : Not Analyzed ---: No Standard

Not All Analytes are Shown for Ease of Review

J: Qualified results indicating value detected between limit of detection and limit of quantitation

Residual Contaminant Levels (RCLs) December 2018