



December 5, 2017

Mr. Steven Dukatt  
Carol Investment Corporation  
1410 S. Clinton St.  
Chicago, IL 60607

Subject: Review of Site Investigation Report Amendment  
Sunrise Shopping Center  
2410-2424 10<sup>th</sup> Ave. & 1009 Marquette Ave., South Milwaukee, WI  
BRRTS #: 02-41-576336 & 02-41-579429, FID #: 241828620

Dear Mr. Dukatt:

On October 9, 2017, the Wisconsin Department of Natural Resources (DNR) received a "Site Investigation Report Amendment" (SIR), dated September 18, 2017, prepared on your behalf by your consultant, DAI Environmental, Inc. (DAI). The SIR was submitted with a Technical Assistance Request fee for DNR review and a written response. On November 11, 2017, the DNR requested additional information, and on November 17, 2017, the "Supplemental Information to Site Investigation Report Amendment" was submitted to the DNR.

### Background

This site was developed as the Caveny & Co. coal and wood yard prior to 1910. The property was likely used to store coal and heating oil until at least 1950. By 1963, two commercial buildings had been constructed on the site. Three former dry cleaners were located on the property between 1966 and 1999. Polycyclic Aromatic Hydrocarbons (PAHs) contamination was found in various places around the property, likely attributable to the former Caveny & Co. operations.

A previous site investigation report was submitted on November 1, 2016. After review, the DNR determined that additional actions were necessary to complete the site investigation. Specifically, the DNR required additional definition of the degree and extent of soil contamination, groundwater monitoring, and vapor intrusion assessment.

It was determined that there were two separate source areas at the site: tetrachloroethylene (PCE) and trichloroethylene (TCE) impacts on the northwestern portion of the property and the PAH contamination in the southern/eastern portion. The two distinct areas of contamination are now addressed under separate BRRTS activity numbers. The two BRRTS cases are included within the SIR, but will separate upon closure.

### SIR Summary

The SIR reported the results of additional soil and groundwater sampling conducted at both release locations. The additional data identified PCE contamination in soil exceeding residual contaminant levels (RCLs) for the protection of the groundwater pathway within the 2410 tenant space and in the alley to the west of the building. Further monitoring revealed a Wis. Admin. § NR 140 Enforcement Standard (ES) exceedance for PCE in the

groundwater sample collected from the monitoring well MW-5. A water sample was collected from the sump in the Ace Hardware basement, which revealed PCE exceeding the Wis. Admin. § NR 140 ES. Indoor air samples collected within the tenant spaces did not identify exceedances of indoor air vapor action levels.

For the PAH investigation, the SIR reported PAHs exceeding their respective RCLs for the protection of the groundwater pathway and direct contact. The SIR also reported Wis. Admin. § NR 140 ES exceedances for select PAHs in the groundwater sample collected from monitoring well MW-3.

Off-site access for additional sampling within the Union Pacific railroad right-of-way and on the Servproperties parcel to the south was denied. As such, the site investigation was not continued onto those properties.

After review of the SIR and the supplemental information, the DNR provides the following comments:

### Completion of Site Investigation

The SIR and previously submitted site investigation data were reviewed for compliance with Wis. Admin. § NR 716. The DNR has determined that additional actions are necessary to complete the site investigation, as summarized below:

- Degree and extent of contamination in all affected media

Wis. Admin. § NR 716.11(3)(a) requires the field investigation to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media. Wis. Admin. § NR 716.15(4)(c) and (d) require the site investigation report to include isoconcentration maps to depict the hazardous substance concentrations in each environmental medium.

1. Further vapor sampling is required to confirm exceedances of the vapor risk screening levels (VRSLs) and to further define the extent of impacts. Resample the sub-slab sampling point SS-101 to confirm the naphthalene exceedance. To delineate naphthalene and PCE VRSL exceedances, collect an additional sub-slab sample(s) between SS-101 and SS-11 within the 2414 tenant space.
2. Evaluate possible vapor intrusion from the Ace Hardware sump. The DNR provides the following options for evaluation:
  - a. Option 1: collect a sub-slab vapor sample from within the sump pit. This procedure is described in the DNR's sub-slab sampling guidance, "Sub-Slab Vapor Sampling Procedures," RR-986.
  - b. Option 2: collect an indoor air sample in the Ace Hardware basement, using a longer collection period (e.g. 48 hours) or a passive adsorption sampler.
3. Indicate where the contaminated sump water is discharging and determine if you are in compliance with applicable discharge rules or if additional actions are necessary to achieve compliance.
4. As was done with soil data, prepare contaminant isoconcentration maps for groundwater and vapor. Contour lines must be drawn to show groundwater contamination above the Wis. Admin. § NR 140 ESs and Preventive Action Limits, and vapor concentrations above the vapor risk screening levels.
5. On cross sections, include isocontour lines to show the areal and vertical extent of contamination in soil and groundwater.
6. On soil concentration figures, exceedances of the three generic soil RCLs, non-industrial direct contact, industrial direct contact, and protection of the groundwater pathway, should be identified, regardless of zoning.

- Off-site affected properties

Wis. Admin. § NR 716.11(4) requires the field investigation to extend beyond the property boundaries of the source site as necessary to fully define the extent of contamination.

1. Off-site access to continue the site investigation was denied. The property owners must be notified of the contamination located on their property and of their responsibility to manage it appropriately.

The above comments apply to the PAH investigation as well, where applicable. The DNR also provides the following comments specific to the PAH investigation:

PAH Investigation (BRRTS #: 02-41-579429)

The DNR concurs that the site investigation for the PAH area is adequate, except for the groundwater investigation. Determine concentration trends for PAHs in groundwater and identify how you plan to address these exceedances.

The site investigation is an iterative process. Future sampling results may indicate that further assessment is needed to define the degree and extent of contamination in all affected media.

Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. § NR 716.09(1), the DNR is requesting the submittal of a revised site investigation work plan within 60 days of the date of this letter, **by February 3, 2018**. The work plan must comply with Wis. Admin. § NR 716.09(2).5
- Per Wis. Admin. § NR 716.11(2g), the additional site investigation activities must begin within 90 days of submittal of the work plan.
- Per Wis. Admin. § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation.
- Per Wis. Admin. § NR 716.14, all sampling results are required to be submitted within 10 days of receiving the laboratory data.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (414) 263-8699, or by email at [Riley.Neumann@wisconsin.gov](mailto:Riley.Neumann@wisconsin.gov).

Sincerely,



Riley D. Neumann  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Christopher Cailles, DAI (email)  
Tom DePaul, DAI (email)