

December 28, 2017

Mr. Riley Neumann  
Wisconsin Department of Natural Resources  
2300 North Dr. Martin Luther King, Jr. Drive  
Milwaukee, Wisconsin 53212-3128

**Re: *Site Investigation Work Plan***  
***BRRTS #: 02-41-576336***  
***FID #: 241828620***  
***Sunrise Shopping Center***  
***2410-2424 10<sup>th</sup> Avenue & 1009 Marquette Avenue***  
***South Milwaukee, Wisconsin 53172***

Mr. Neumann:

DAI Environmental Inc., (DAI) is in receipt of the Wisconsin Department of Natural Resources (WDNR) *Review of Site Investigation Report Amendment* dated December 5, 2017. The WDNR's review was in response to DAI's *Site Investigation Report Amendment* dated September 18, 2017, as well as a report entitled *Supplemental Information to Site Investigation Report Amendment*, dated November 17, 2017, which was in response to the WDNR's additional information request of November 11, 2017.

This *Site Investigation Work Plan* (SIWP) proposes additional groundwater, soil vapor sampling, and related reporting information as requested in WDNR's December 5<sup>th</sup> review letter.

## SUMMARY OF WDNR REVIEW COMMENTS

The WDNR's review comments requested additional information to address several outstanding issues prior to approval of the Site Investigation. The comments addressed five (5) areas of concern, which are summarized below.

- 1.) **Off-site Affected Properties** Since off-site access has been denied, the off-site property owners must be notified of the contamination located on their property and of their responsibility to manage it appropriately.
- 2.) **Soil Vapor Intrusion Sampling** WDNR requested additional sub-slab soil vapor sampling within the 2410 tenant space, the 2414 tenant space, and in the Ace Hardware sump. (Indoor air sampling was listed as an alternative to sub-slab sampling at this location.)

- 3.) **Ace Hardware Sump Discharge Requirements** WDNR requested that compliance with all applicable sump discharge rules be determined, and to take any additional actions necessary to demonstrate compliance with these regulations.
- 4.) **PAH Concentration Trends** WDNR requested that groundwater Polynuclear Aromatic Hydrocarbon (PAH) concentrations trends be evaluated, and that if any exceedances are identified, a plan to address these exceedances be prepared.
- 5.) **Figures and Reporting Requirements** WDNR also requested that certain iso-concentration maps, cross sections, and soil concentration figure details be prepared.

### **PROPOSED ACTIVITIES**

In response to the WDNR's requests, the following activities are proposed:

- 1.) **Off-site Affected Properties** Notification following Form 4400-286 "Notification of Continuing Obligations and Residual Contamination" will be sent to the off-site affected property owner, Union Pacific. A copy of the proposed notification is included here as Attachment A.
- 2.) **Soil Vapor Intrusion Sampling** Sub-slab vapor samples will be collected at the five (5) locations described in Figure 1 (attached). One (1) sample will be a re-sample at location SS-101, three (3) samples will be collected within the 2414 tenant space, and one (1) sample will be collected from below the slab in the Ace Hardware sump. All samples will be collected and analyzed following the "Sub-Slab Vapor Sampling Procedures" provided in RR-986.
- 3.) **Ace Hardware Sump Discharge** The receiving body for the sump discharge will be determined and the regulatory agency with jurisdiction over the discharge will be identified. All applicable rules and regulations regarding this discharge will be determined and compliance evaluated. In the event that the discharge does not meet compliance with any applicable regulation, a proposal to remedy this infraction will be proposed to WDNR. Upon approval by WDNR, the remedy will be implemented.
- 4.) **PAH Groundwater Sampling** To determine the PAH groundwater concentration trends, groundwater samples will be collected from each of the six (6) permanent monitoring wells and analyzed for PAH concentration on a quarterly basis. Based upon the results of the first sampling event, only those monitoring wells indicating the presence of PAH in groundwater will be sampled in subsequent quarterly sampling events. The results will be reported to WDNR each quarter. If the PAH concentrations do not continue to decrease and meet compliance in an acceptable time frame, a plan to address the exceedances will be submitted to WDNR.
- 5.) **Figures and Reporting Requirements** The specific iso-concentration maps, cross sections, and soil concentration figures outlined in WDNR's December 5<sup>th</sup>, 2017, review letter will be prepared and submitted to WDNR.

If you have any questions, require additional information, or would like to discuss the proposed locations, please contact me at 847-573-8900 extension 580. Thank you for your time and assistance.

Sincerely,  
**DAI Environmental, Inc.**

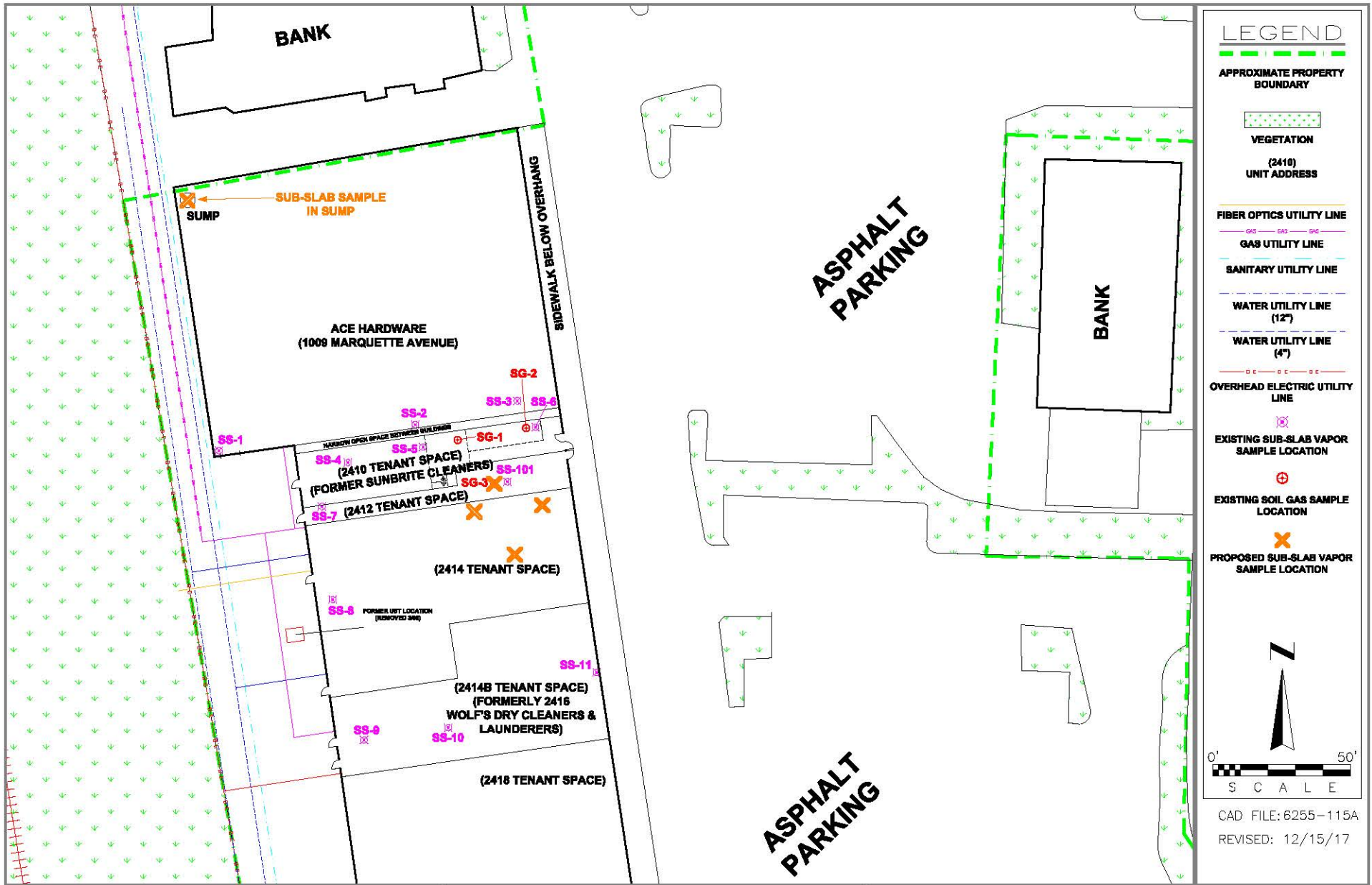
A handwritten signature in blue ink that reads "Christopher Cailles". The signature is written in a cursive style.

Christopher Cailles, P.E.  
Project Engineer

Attachments

cc: Steven Dukatt – Carol Investment Corporation (w/attachments)

**FIGURE**



**DAI**  
ENVIRONMENTAL

**SUNRISE SHOPPING CENTER  
2410-2424 10TH AVENUE  
1009 MARQUETTE AVENUE  
SOUTH MILWAUKEE, WISCONSIN**

**FIGURE 1  
PROPOSED SUB-SLAB VAPOR  
SAMPLE LOCATIONS**

**ATTACHMENT A**  
**OFF-SITE NOTIFICATION**

**Notification of Continuing Obligations and Residual Contamination**

Form 4400-286 (9/15)

C. I. Page

**The affected property is:**

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
- a deeded property affected by contamination from the source property
- a right-of-way (ROW)
- a Department of Transportation (DOT) ROW

**Include this completed page as an attachment with all notifications provided under sections A and B.**

**Contact Information**

**Responsible Party:** The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Carol Investment Corporation

|                                      |                 |                 |  |                   |
|--------------------------------------|-----------------|-----------------|--|-------------------|
| Contact Person Last Name<br>Dukatt   | First<br>Steven | MI              | Phone Number (include area code)<br>(773) 227-6500 |                   |
| Address<br>1410 South Clinton Street |                 | City<br>Chicago | State<br>IL  | ZIP Code<br>60607 |
| E-mail awgreen1410@sbcglobal.com     |                 |                 |  |                   |

**Name of Party Receiving Notification:**

Business Name, if applicable: Union Pacific Railroad

|   |                       |                |             |  |  |
|---|-----------------------|----------------|-------------|--|--|
| Title<br>Ms.                              | Last Name<br>Gearhart | First<br>Kelly | MI          | Phone Number (include area code)<br>(402) 544-4155 |  |
| Address<br>1400 Douglas Street, STOP 1030 |                       | City<br>Omaha  | State<br>NE | ZIP Code<br>68179                                  |  |

**Site Name and Source Property Information:**

Site (Activity) Name Sunrise Shopping Center

|  |  |                         |             |                   |  |
|--|--|-------------------------|-------------|-------------------|--|
| Address<br>2410-2424 10th Ave & 1009 Marquette Ave |  | City<br>South Milwaukee | State<br>WI | ZIP Code<br>53172 |  |
| DNR ID # (BRRTS#)<br>02-41-576336                  |  | (DATCP) ID #            |             |                   |  |

**Contacts for Questions:**

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

**Environmental Consultant:** DAI Environmental, Inc.

|  |                   |                     |  |                   |
|--|-------------------|---------------------|--|-------------------|
| Contact Person Last Name<br>Rovzar     | First<br>Jennifer | MI                  | Phone Number (include area code)<br>(847) 573-8900 |                   |
| Address<br>27834 North Irma Lee Circle |                   | City<br>Lake Forest | State<br>IL  | ZIP Code<br>60045 |
| E-mail rovzar@daienv.com               |                   |                     |  |                   |

**Department Contact:**

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

|   |                |                   |  |                   |  |
|---|----------------|-------------------|--|-------------------|--|
| Address<br>2300 North Martin Luther King Drive                        |                | City<br>Milwaukee | State<br>WI  | ZIP Code<br>53212 |  |
| Contact Person Last Name<br>Neumann                                   | First<br>Riley | MI                | Phone Number (include area code)<br>(414) 263-8699 |                   |  |
| E-mail (Firstname.Lastname@wisconsin.gov) Riley.Neumann@wisconsin.gov |                |                   |  |                   |  |

**Notification of Continuing Obligations  
and Residual Contamination**

Form 4400-286 (9/15)

**Section B: ROW Notification: Residual Contamination and/or Continuing Obligations - Non-DOT ROWs**

**KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS**

1400 Douglas Street, STOP 1030  
Omaha, NE, 68179

Dear Ms. Gearhart:

I am providing this notification to inform you of the location and extent of contamination remaining in a right-of-way for which you are responsible, and of certain long-term responsibilities (continuing obligations) for which railroad of Union Pacific may become responsible. I investigated a release of: Perchloroethylene from a former dry cleaner historically located on 2410-2424 10th Ave & 1009 Marquette Ave, South Milwaukee, WI, 53172 that has shown that contamination has migrated into the right-of-way for which railroad of Union Pacific is responsible. I have responded to the release, and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

**You have 30 days to comment on the proposed closure request:**

The DNR will not review my closure request for at least 30 days after the date of this letter. As an affected right-of-way holder, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the DNR that is relevant to this closure request, you should mail that information to the DNR contact: 2300 North Martin Luther King Drive, Milwaukee, WI, 53212, or at Riley.Neumann@wisconsin.gov.

**Residual Contamination:**

***Groundwater Contamination:***

Groundwater contamination originated at the property located at: 2410-2424 10th Ave & 1009 Marquette Ave, South Milwaukee, WI, 53172.

The levels of estimated Perchloroethylene (see Figure 1)

contamination in the groundwater on your property are above the state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code.

If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If you or any other person plan to conduct utility or building construction for which dewatering will be necessary, you or that person must contact the DNR's Water Quality Program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>.

**Continuing Obligations on the Right-of-Way (ROW) :** As part of the response actions, I am proposing that the following continuing obligations be used at the affected ROW. If my closure request is approved, you will be responsible for the following continuing obligations:

**GIS Registry and Well Construction Requirements:**

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at <http://dnr.wi.gov/topic/Brownfields/clean.html>. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.



**Notification of Continuing Obligations  
and Residual Contamination**

Form 4400-286 (9/15)

Page 2 of 4

If you have any questions regarding this notification, I can be reached at: (847) 573-8900  
cailles@daienv.com

| <i>Signature of responsible party/environmental consultant for the responsible party</i> | Date Signed     |
|--|-----------------|
| <i>Christopher Cailles</i>   | <i>12/28/17</i> |

**Attachments**

**Contact Information**

**Legal Description for each Parcel:**

