



December 5, 2017

Mr. Joel Aizen  
The Couture  
c/o Barrett Lo Visionary Development  
260 E. Highland Ave., Suite 401  
Milwaukee, WI 53233

Subject: Site Investigation Report and Remedial Action Plan Approval  
The Couture, 909 E. Michigan St., Milwaukee, WI  
DNR BRRTS #02-41-579105 FID #341286220

Dear Mr. Aizen:

The Wisconsin Department of Natural Resources (DNR) received the October 11, 2017 *Site Investigation Report and Remedial Action Plan* (SI/RAP) and associated review fee for the above-referenced case. Giles Engineering Associates, Inc. (Giles) submitted the report on behalf of The Couture, LLC and Barrett Lo Visionary Development with a request for DNR approval of the site investigation activities conducted at the site and the proposed remedial action plan. Based on review of the SI/RAP and previously submitted information, DNR approves the site investigation and conditionally approves the proposed remedial action plan as described below.

#### Site Summary

The site, an approximate 2.12-acre vacant parcel, is proposed to be redeveloped with a 44-story mixed-use building with two levels of sub-grade parking. Construction of the building/parking structures will require excavation of the entire property to a depth of 25 feet below ground surface (bgs), generating approximately 85,500 cubic yards of material. Three distinguishable materials have been encountered at the site in the soil/fill profile from 0 to 25 feet including, soil fill, waste fill including foundry sand and cinders, and native sand and clay soil. The fill materials range in thickness from 4 to 18 feet above native soil.

#### Site Investigation

Environmental investigations conducted within the fill materials at the site have identified site-wide polycyclic aromatic hydrocarbons (PAHs) and select metals contamination at concentrations that exceed soil standards (residual contaminant levels (RCLs)) based on direct contact and protection of groundwater. Volatile organic compounds (VOCs) were detected at several isolated locations within the fill at concentrations exceeding groundwater protection RCLs. Soil samples collected from native soil did not contain PAHs, metals or VOCs above RCLs. Investigation of groundwater at the site did not identify significant contamination.

#### Remedial Action Plan

Based on the proposed building design that will require excavation of accessible soil on the entire 2.12-acre lot to a depth of 25 feet, it is expected that all accessible contaminated material will be removed from the site. The redevelopment plan is the remedial action plan for the site. The SI/RAP includes a proposal for how excavated material will be disposed of off-site. Identified soil contaminated with VOCs is proposed to be excavated and disposed of at a licensed landfill. Other fill material present above native soil is proposed to be disposed of at an alternative disposal site. Giles has submitted a low hazard waste exemption request to DNR Waste and Materials Management program to allow this disposal under s. 289.43(8) Wis. Stats. Excavated native soil is proposed to be managed with un-restricted use.

Site Investigation/Remedial Action Plan Approval

Based on review of the SI/RAP and previously submitted information, DNR approves the site investigation as complete. No additional investigation of soil or groundwater is required to define the extent and degree of contamination identified at the site. Although not expected, if previously unidentified, significant contamination is discovered at the perimeter of site during excavation activities, the discovery should be reported to DNR and additional investigation may be necessary.

Based on the planned removal of contaminated soil at the site, the remedial action plan is also approved. Approval is conditioned on your obtaining approval of the proposed soil management plan or an alternative plan for off-site disposal of soil/fill generated during development.

DNR appreciates the efforts The Couture, LLC is taking to investigate and restore the environment at this property. Please do not hesitate to contact me at (414) 263-8533 or at [nancy.ryan@wisconsin.gov](mailto:nancy.ryan@wisconsin.gov) if you have any questions or concerns regarding this approval.

Sincerely,



Nancy D. Ryan, Hydrogeologist  
Remediation and Redevelopment Program

Cc: Kevin Bugel, Giles – electronic copy