

Yang, Chue Yee - DNR

From: Ryan, Nancy D - DNR
Sent: Wednesday, February 14, 2018 8:50 AM
To: 'Rick Frieseke'
Cc: Cory Katzban (ckatzban@thesigmagroup.com)
Subject: NR 718 request BMO Downtown Parking structure

Rick and Cory,

As Cory knows, I have been reviewing the BMO parking structure SI/RAP and the 718 soil management request for disposal at R&R excavating and have identified a few issues that will have to be addressed before DNR can complete the review of the site investigation or the 718.12 request for disposal of up to 2,400 yd³ at R&R excavating site. Cory is aware of these issues, but there are a few items missing from the 718 disposal request that I'd like mention here.

As discussed with Cory, VOCs and elevated PAHs were identified at borings SB-24 and SB-25 south of the executive parking garage, actually on Lot 3, and this contamination not appear to have been defined, which affects the completeness of the SI and management options for soil around SB-24 and SB-25 and under the building adjacent to those borings.

The 718 request from FEC states that VOC impacted soil would not be disposed of at R&R (top of page 3). It is not clear what this means, or whether soil from the earth retention/footings excavation is or isn't included in the request. However, from my discussions with Cory, I understand that the intent was/is that this soil would be managed at R&R. This will need to be clarified in a revised 718.12 request and/or as plans evolve whether it is or isn't proposed for disposal at RR. Additional information not included in the 718.12 request but needed:

- Identification of Ponfil Trust as owner
- Signature of owner: Ponfil
- Figure(s) of the disposal property
- Copy of the reclamation plan
- Description of location and depths of excavations (cut fill map) clearly identifying location of soil proposed for disposal at R&R and delineation of soil > RCLs within the proposed excavation areas. Estimate of volume of contaminated soil proposed to be disposed of at RR. It would be helpful to include x-sections with excavation depths and RCL exceedance lines included on the figure(s)
- Discussion of soil results that exceed protection of groundwater RCLs (if proposed for disposal at R&R) –SPLP sample results were provided but not discussed to support the argument that contaminant leaching to groundwater would not occur at disposal site.

As you're aware, approval of the SI/RAP, soil management plan is requested by the RP ASAP and the information identified above is needed for me to complete my review of the 718.12 request (as well as any other changes to the original SI/RAP). Please call if you wish to discuss.

Thanks,

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Nancy D. Ryan

Hydrogeologist, Bureau for Remediation and Redevelopment

Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King, Jr. Dr.
Milwaukee, WI 53212
Phone: (414) 263-8533
Fax: (414) 263-8550
nancy.ryan@wisconsin.gov



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