State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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May 15, 2019

Mr. Frank Dombrowski
Wisconsin Electric Power Company (d.b.a We Energies)
333 W. Everett St. A231
Milwaukee, WI 53203

SUBJECT: Review of Site Investigation Work Plan for Metro North Service Center
3100 West North Avenue, Milwaukee, Wisconsin
WDNR BRRTS Activity #: 02-41-583015
FID #: 241311510

Dear Mr. Dombrowski:

On March 19, 2019 the Wisconsin Department of Natural Resources (DNR) received a Site Investigation Work Plan (the Work Plan) prepared by Geosyntec Consultants (Geosyntec) for the property located at 3100 West North Avenue (Site), Milwaukee, Wisconsin. The Work Plan stated that contaminated soil and groundwater potentially associated with a former dry-cleaning facility at the Site was identified from environmental site assessments completed on the property. Specifically, soil and groundwater contaminated with chlorinated volatile organic compounds (CVOCs) was discovered near the southwest corner of the on-site building and in areas to the west of the building. The Work Plan proposes activities designed to further characterize the degree and extent of contaminants associated with this discharge.

A fee was paid to the DNR for review of the Work Plan to determine whether the proposed activities meet the requirements stated in the DNR letter to We Energies dated January 24, 2019. The DNR has reviewed the Work Plan and determined that the following information needs to be provided for the DNR to be able to review and assess the proposed scope of work for compliance with Wis. Admin. Code § NR 716.09.

1) The Work Plan references previous site data used for planning purposes for the December 2018 soil and groundwater assessment. This data and the rationale for the scope of the December 2018 assessment is needed to be able to assess whether the Work Plan will adequately determine the degree and extent of impacts to all media.

    a. Submit all the soil boring logs and borehole abandonment forms for the soil borings conducted on-site in July and October 2018. Also submit the photoionization readings collected for these soil borings if not included on the soil boring logs.

    b. It is stated in the Work Plan that historical Sanborn maps indicated potential environmental concerns in the area of the proposed building expansion, on the southwest side of the current building. The maps also indicated other areas of potential environmental concern (a plating works, door manufacturer and other facilities) where

soil borings were completed. Explain why only VOC sampling in the area of the former dry cleaner was performed, and no samples collected for potential contaminants (such as metals or PAHs) in these locations or in the other potential areas of concern identified in the Sanborn maps where soil borings were performed for future building expansion.

2) The Work Plan includes data regarding soil types, depths to groundwater, utilities, and contaminant locations and concentrations. To be able to determine if the proposed scope of work is appropriate, an evaluation and discussion of the possible mechanism for the distribution of observed impacts should be submitted along with identification of data gaps. State the rationale for each proposed boring or well location. To support your discharge source discussion and Work Plan scope rationale, also include the following:

    a. A site map that includes the location of the presumed discharge source (or sources), with one or more figures that include the extent of known soil and groundwater impacts (with contours and sample depths). For clarity of site features, you may want to include only the southern half of the property that includes the proposed Work Plan scope. The site map should include identification of included features such as: surface covers, office areas of the building, rectangular features on the north side of the property, etc.

    b. A geologic cross-section that includes the area of highest contaminant impacts. Include appropriate soil borings/temp wells, along with utilities and depths where known.

    c. Provide an explanation as to how the degree and extent of impacts south of the property will be defined (e.g., areas of GP-2 and GP-3).

    d. Data provided in the Work Plan do not indicate a well-defined groundwater flow direction or depth at this time. It may be premature to propose piezometers with the current limited data. Soil borings are proposed within the building; if site conditions permit, also consider monitoring well installation within the building (such as in the garage), and in the areas of GP-12 or GP-15.

    e. The Work Plan should state the rationale for planned soil sample collection (such as upper four feet for direct contact assessment, above the water table, etc.). Determination of soil and groundwater characteristics, such as hydraulic conductivity, should also be described in the Work Plan.

3) High levels of CVOCs are known to be present in the subsurface near the current building. The Work Plan should propose a sub-slab vapor sampling program within the footprint of the building as part of the vapor investigation. Include a figure showing proposed sampling locations and rationale, sampling methodology and type of lab analysis. The planned investigation should include identification of subsurface features that may affect vapor migration (utilities, footings, etc.), areas of building usage, and determination if contaminants of concern are or have been used as part of vehicle maintenance or other activities on-site.

Please submit a revised work plan that addresses the above comments within 60 days, describing the work necessary to complete a Wis. Admin Code NR 716 compliant site investigation.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (414) 263-8369 or by email at adam.mcilheran@wisconsin.gov.

Sincerely,

Adam S. McIlheran
Hydrogeologist
Remediation & Redevelopment Program

cc: Jeremiah Johnson, Geosyntec Consultants, 10600 N. Port Washington Road, Suite 100
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SER File