

**Notice:** Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

## Definitions

**"Property"** refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

**"Liability Clarification"** refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

**"Technical Assistance"** refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

**"Post-closure modification"** refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

## Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: [dnr.wi.gov/topic/Brownfields/Pubs.html](http://dnr.wi.gov/topic/Brownfields/Pubs.html).

## Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

## Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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### Section 1. Contact and Recipient Information

#### Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name		
Stith	Andrew		Cristo Rey Milwaukee NMTC SP (Cristo Rey Jesuit HS)		
Mailing Address			City	State	ZIP Code
1818 W. National Avenue			Milwaukee	WI	53204
Phone # (include area code)	Fax # (include area code)	Email			
(414) 436-4600		astith@crstoreymilwaukee.org			

The requester listed above: (select all that apply)

- Is currently the owner
  Is considering selling the Property  
 Is renting or leasing the Property
  Is considering acquiring the Property  
 Is a lender with a mortgagee interest in the Property  
 Other. Explain the status of the Property with respect to the applicant:

#### Contact Information (to be contacted with questions about this request) Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name		
Stith	Andrew		Cristo Rey Milwaukee NMTC SP (Cristo Rey Jesuit HS)		
Mailing Address			City	State	ZIP Code
1818 W. National Avenue			Milwaukee	WI	53204
Phone # (include area code)	Fax # (include area code)	Email			
(414) 436-4600		astith@crstoreymilwaukee.org			

#### Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name		
Peterson	Travis		Kapur, Inc.		
Mailing Address			City	State	ZIP Code
7711 North Port Washington Road			Milwaukee	WI	53217
Phone # (include area code)	Fax # (include area code)	Email			
(414) 751-7279		tpeterson@kapurinc.com			

### Section 2. Property Information

Property Name				FID No. (if known)	
1818 W. National Avenue				241878450	
BRRTS No. (if known)			Parcel Identification Number		
0241583465			4339927111		
Street Address			City	State	ZIP Code
1818 W. National Avenue			Milwaukee	WI	53204
County	Municipality where the Property is located		Property is composed of:		Property Size Acres
Milwaukee	<input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Milwaukee		<input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels		8

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1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No  Yes

Date requested by: \_\_\_\_\_

Reason: \_\_\_\_\_

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

**Section 3. Technical Assistance or Post-Closure Modifications;**

**Section 4. Liability Clarification; or Section 5. Specialized Agreement.**

**Section 3. Request for Technical Assistance or Post-Closure Modification**

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
  - Include a fee of \$300 for sites with residual soil contamination; and
  - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

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**Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.**

**Section 4. Request for Liability Clarification**

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
  - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
  - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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**Section 4. Request for Liability Clarification (cont.)**

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the Property and the person who will lease the Property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
- (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
- (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

**Section 5. Request for a Specialized Agreement**

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: [dnr.wi.gov/topic/Brownfields/lgu.html#tabx4](http://dnr.wi.gov/topic/Brownfields/lgu.html#tabx4).

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

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**Section 6. Other Information Submitted**

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: \_\_\_\_\_  
 Phase II Environmental Site Assessment Report - Date: \_\_\_\_\_  
 Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater     Soil     Sediment     Other medium - Describe: \_\_\_\_\_

Date of Collection: \_\_\_\_\_

- A copy of the closure letter and submittal materials  
 Draft tax cancellation agreement  
 Draft agreement for assignment of tax foreclosure judgment  
 Other report(s) or information - Describe: \_\_\_\_\_

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): \_\_\_\_\_  
 No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:

[dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf](http://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf).

**Section 7. Certification by the Person who completed this form**

- I am the person submitting this request (requester)  
 I prepared this request for: Cristo Rey Milwaukee NMTC SP

Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Tracy Petersen  
Signature

5/13/21  
Date Signed

Associate, Senior Project Manager

(414) 751-7279

Title

Telephone Number (include area code)

# Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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## Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a DNR regional brownfields specialist with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

### DNR NORTHERN REGION

Attn: RR Program Assistant  
Department of Natural Resources  
223 E Steinfest Rd Antigo, WI 54409

### DNR NORTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2984 Shawano Avenue  
Green Bay WI 54313

### DNR SOUTH CENTRAL REGION

Attn: RR Program Assistant  
Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg WI 53711

### DNR SOUTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2300 North Martin Luther King Drive  
Milwaukee WI 53212

### DNR WEST CENTRAL REGION

Attn: RR Program Assistant  
Department of Natural Resources  
1300 Clairemont Ave.  
Eau Claire WI 54702



*Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.*

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

May 13, 2021

Mr. David Hanson  
Wisconsin Department of Natural Resources  
Remediation and Redevelopment  
2300 N. MLK Drive  
Milwaukee, Wisconsin 53212

RE: **Environmental Activities Update  
Former NDC Inc./Mega Marts (now Cristo Rey Jesuit Highschool)  
1818 W. National Avenue, Milwaukee, Wisconsin  
BRRTs #03-41-000547, 03-41-099673, 03-41-001317, 03-41-101491,  
03-41-001060  
FID #241302490, 241878450, 241532940, 241883070, 241116040  
Regulatory Status: Open ERP**

Dear Mr. Hanson:

Kapur Inc. (Kapur) has completed additional environmental investigation and remediation activities at the above referenced site as part of the Materials Management Plan approved by the Wisconsin Department of Natural Resources on May 10, 2019. The actions completed detailed herein are being presented to support a No Further Action or approval to proceed with case closure per ch. NR 726 from the Department. This update includes owner contact and property information, maps and drawings of how the contaminated material has been managed, details of the work conducted including any deviations from the approved management plan, field observations and/or monitoring results conducted during the management activities, and a description of how the new site conditions are protective of human health, safety, welfare and the environment.

If you have any questions or comments, please feel free to call me at 414-751-7279.

Sincerely,

KAPUR INC.



Travis Peterson  
Associate, Senior Project Manager  
attachments

cc: Andrew Stith, Cristo Rey Jesuit High School [astith@crestoremilwaukee.org](mailto:astith@crestoremilwaukee.org)







## **SITE HISTORY**

The subject site was originally developed as residential properties prior to 1937. The land use gradually transitioned to commercial from circa 1937 through 1995 until the most recent site layout, prior to redevelopment, was constructed between 1995 and 2000 that included a commercial grocery store and asphalt parking. The site is identified as having several listings within the BRRTS database including:

1. Mrs Karls (Interstate Brands Corp.) FID: 241302490, LUST: 03-41-000547
2. NDC Inc Mega Marts, FID: 241878450, LUST: 03-41-099673
3. Wenninger Co, FID: 241116040, LUST: 03-41-001060
4. NDC Inc/Mega Marts, FID: 241883070, LUST: 03-41-101491
5. Value Village, FID: 241532940, LUST: 03-41-001317
6. **1818 W National Ave, FID: 241878450, ERP: 02-41-583465 (Open Case)**

All five LUST activities at the site have been closed and the ERP designation remains open and was opened as a requirement for approval of the ch. NR 718 Material Management Plan. Residual polynuclear aromatic hydrocarbons (PAHs), Volatile Organic Compounds (VOCs) and Resource Conservation and Recovery Act (RCRA) metals contamination remains onsite.

The site has undergone redevelopment into an educational (high school) facility. The redevelopment included removal of the former grocery store structure and parking areas and construction of the new slab-on-grade school building, an athletic field, asphalt parking areas, landscaped greenspace and hardscape.

## **PREVIOUS SUBSURFACE ASSESSMENT**

In September and December of 2018 Kapur collected soil samples for laboratory analysis of PAHs, VOCs, and RCRA Metals at the site in the areas that were potentially impacted based upon former activities located at the site and of those likely to be encountered during site construction activities. Results of the laboratory analysis are located in Table A.2. Three main areas of residual contamination were identified, under the northeast corner of the proposed building (PVOCs), southwest of the proposed building (PVOC) and generally throughout the proposed project area (PAHs, metals). During construction activities, onsite PVOC/VOC soil impacts were proposed to be removed to the extent practical (within the general scope of the project construction requirements) and low-level PAH / Metals impacts would only be removed if needed for redevelopment.





As the potential for construction activities to encounter residual PAH, VOC, and RCRA Metals contaminated soils existed, the following precautions and soil handling methods were implemented:

- Soil excavation and relocation monitoring, including:
  - Maintaining field logs of all excavation activities.
  - Photographic documentation of excavation and soil relocation activities showing soil conditions.
  - Periodic field screening of excavation soils utilizing a PID meter. Logging of field screening analysis results.
  - Preparation of a Soil Management Plan Completion Report detailing construction excavation and soil relocation activities along with soil screening analysis results (submitted to the Department in May 2021).
- For soil that could not be reused on-site due to volume or geotechnical restrictions, the soil was transported to a licensed landfill for disposal in accordance with ch. NR 718, Wisconsin Administrative Code under approved waste profile and manifest.
- Erosion control means were also implemented around the worksite as required.

### **SOIL RELOCATION AND EXCAVATION MONITORING ACTIVITIES**

From June 2019 through June 2020 Kapur monitored soil excavation and relocation activities during the construction project. The work completed adhered to the approved Materials Management Plan with little to no deviation, except for less material being reused onsite due to unforeseen site/soil conditions, weather impacts and construction requirements. Some soils planned for reuse were deemed unsuitable as they did not meet compaction requirements and were transported offsite under approved waste manifest.

A total of 818.10 tons or an est. 585 cubic yards of impacted soil material was transported offsite for disposal as either low hazardous 'daily cover' or 'bio-treated' waste soil at Waste management – Orchard Ridge licensed landfill facility under approved manifest. Bio-treated waste soil originated from an area of contaminant impacts identified as a potential 'new' release during initial subsurface soil profiling and is listed as BRRTS #02-41-583465 1818 W. NATIONAL AVENUE. Throughout the course of excavation activities being performed, Kapur performed periodic inspections and field screening of the soils being disturbed. Soil conditions observed during construction did not vary significantly from those identified during previous geotechnical and soil profiling activities completed.





## **FINDINGS AND CONCLUSIONS**

Onsite excavation activities and utility installations suggest the area of impact associated with the open ERP case is much smaller than originally estimated, as adjacent utility trench excavations did not trigger a reading above background levels on the PID nor were any stained or odorous soils noted. The same area was excavated down a minimum 2-3 feet as a large area of soil material onsite was deemed not suitable for construction and was transported to Waste Management Orchard Ridge landfill for disposal. The area was filled with large gravel/stone material and compacted acting as a tracking pad for vehicles entering and leaving the construction site. Groundwater was not encountered during excavation activities.

The area in question is now located mostly, if not entirely under an engineered barrier of asphalt driveway and concrete walkway. Research of the site history and potential contaminant source has been performed and though no clear point source for the petroleum contamination has been identified, the impacts are most likely attributed to historic filling (waste fill/foundry sand) that occurred onsite as previous commercial buildings were being razed and site grading was completed.

The area will be maintained to be sure the existing engineered barriers (cap) remains in place and without defect. Additionally, part of the proactive construction plan included installation of a sub-slab ventilation system designed to easily be converted to an active depressurized system should the need arise, and obvious volatile contaminated soils be encountered during construction. The system is currently operating in a passive mode though a wind driven turbine style vent has been installed to facilitate vapor removal as another proactive measure.

## **OPINIONS AND RECOMMENDATIONS**

The above redevelopment and monitoring activities have shown that the current site conditions and development are protective of the soil direct contact, groundwater migration and vapor intrusion pathway risk factors. Understanding only field screening of the subsurface soil was completed in the area of the Open ERP contaminant plume, it is likely the contaminant plume is much smaller than originally estimated. Based upon the extent of soil excavation completed and the engineered barriers constructed over the estimated plume, natural attenuation processes are anticipated to further breakdown the residual contamination. **As such, Kapur does not believe additional investigation activities are warranted and the case be approved to submit for closure consideration.**





## FIGURES



PRE-CONSTRUCTION

PROJECT:  
CRISTO REY  
JESUIT HIGH  
SCHOOL

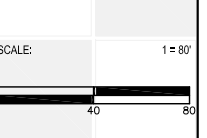
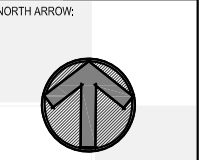
LOCATION:  
1818 WEST  
NATIONAL AVE.  
MILWAUKEE, WI  
53204

CLIENT:

RELEASE:

REVISIONS:

#	DATE	DESCRIPTION

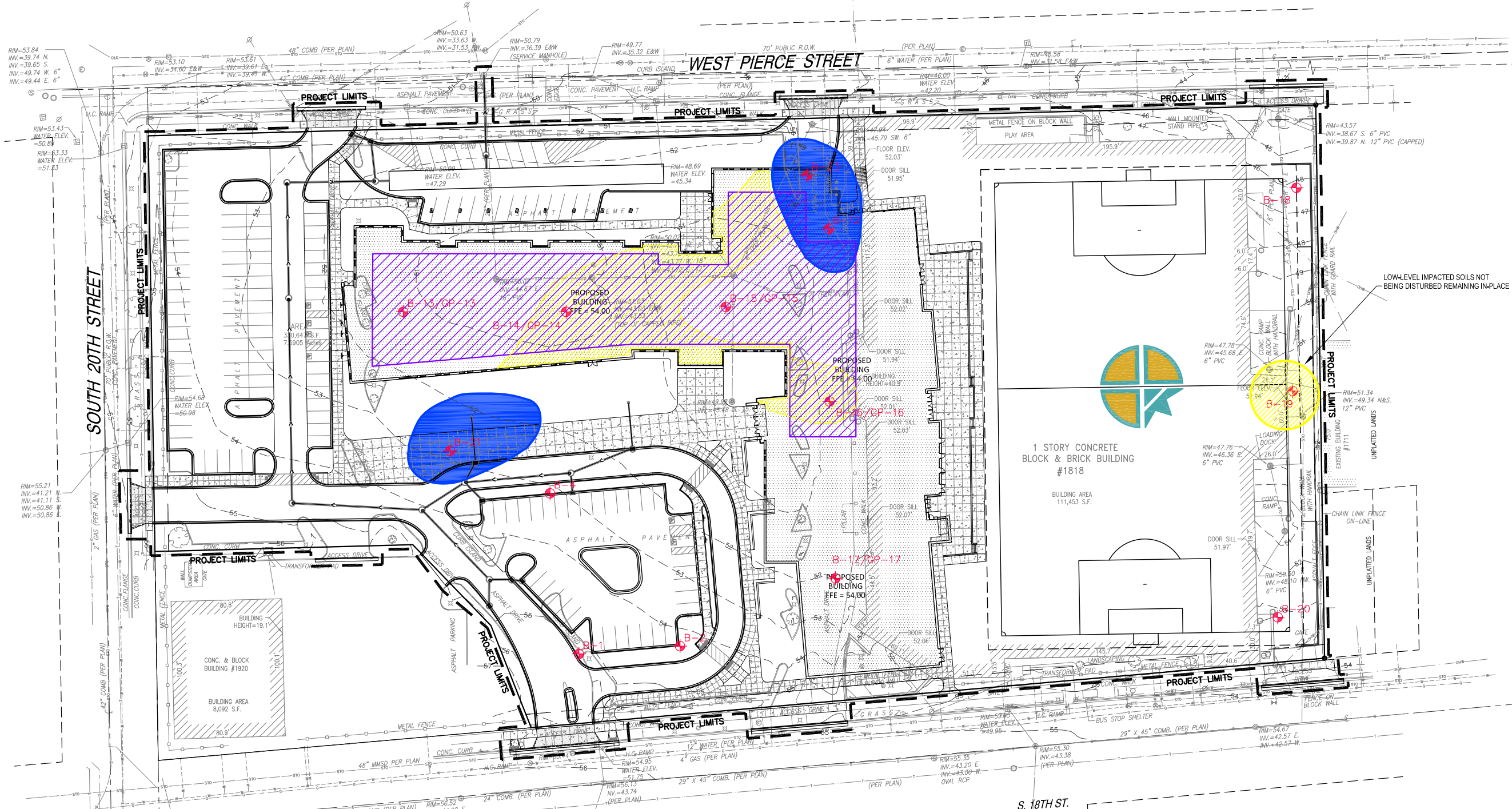


SEAL:

SHEET:  
SOIL DISPOSAL /  
RELOCATION MAP

PROJECT MANAGER: TP  
PROJECT NUMBER: 180231.01  
DATE: 01/29/2019

SHEET NUMBER:  
**5**



**LEGEND**

- AREAS HIGHLIGHTED IN BLUE REQUIRE LANDFILL DISPOSAL
- AREAS HIGHLIGHTED IN YELLOW ARE PERMISSIBLE TO BE REPLACED IN SAME AREA OR UNDER IMPERVIOUS LAYER WITH APPROVED SMP OR LANDFILL DISPOSED OF.
- AREAS HIGHLIGHTED IN PURPLE ARE WHERE LOW-LEVEL IMPACTED SOILS ARE PROPOSED FOR RE-USE
- REMAINING SOIL BORINGS TESTED, SHOWED NO EXCEEDANCES ABOVE LDL'S OR BACKGROUND THRESHOLD LEVELS.

POST-CONSTRUCTION

PROJECT:  
**CRISTO REY  
JESUIT HIGH  
SCHOOL**

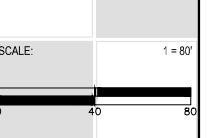
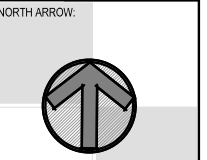
LOCATION:  
**1818 WEST  
NATIONAL AVE.,  
MILWAUKEE, WI  
53204**

CLIENT:

RELEASE:

REVISIONS:

#	DATE	DESCRIPTION

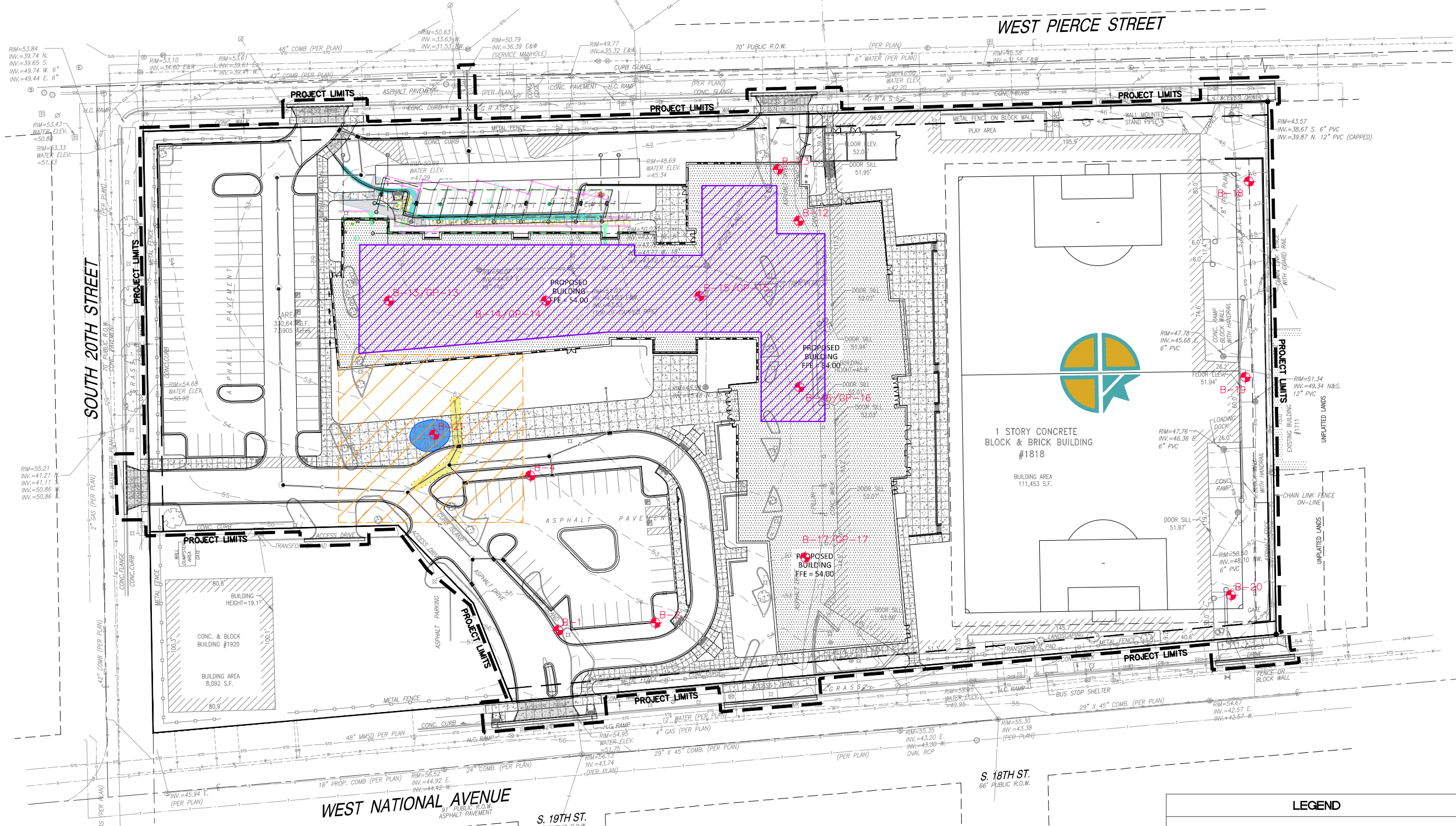


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



SHEET:  
**SOIL DISPOSAL /  
RELOCATION MAP  
AND RESIDUAL SOIL  
CONTAMINANT PLUME**

PROJECT MANAGER: TP  
PROJECT NUMBER: 180231.01  
DATE: 01/29/2019

SHEET NUMBER:  
**5**



**LEGEND**

-  REASSESSED ESTIMATED AREA OF RESIDUAL SOIL CONTAMINATION
-  EXTENT OF UTILITY EXCAVATION ADJOINING 'SOURCE AREA' FIELD SCREENED HAVING NO OBVIOUS IMPACTS
-  MINIMUM AREA OF OVER-EXCAVATION OF 3-4 FEET BGS OR GREATER
-  GEOTECHNICAL SOIL BORING LOCATIONS

SOUTH 20TH STREET

WEST PIERCE STREET

WEST NATIONAL AVENUE

S. 18TH ST.

S. 19TH ST.

PROJECT LIMITS

PROJECT LIMITS

PROJECT LIMITS

PROJECT LIMITS

PROJECT LIMITS

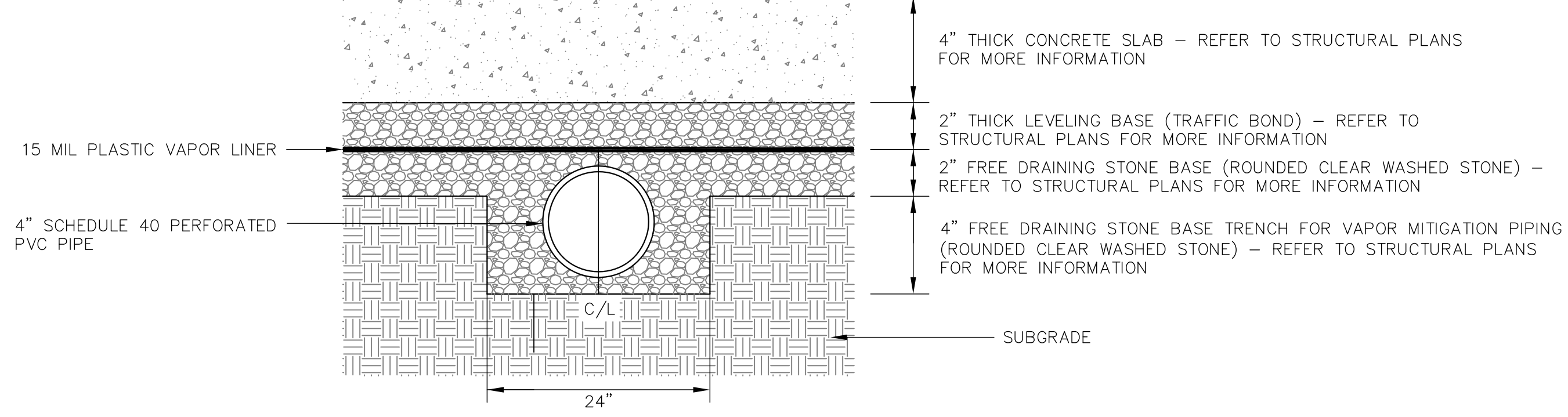
PROJECT LIMITS

PROJECT LIMITS

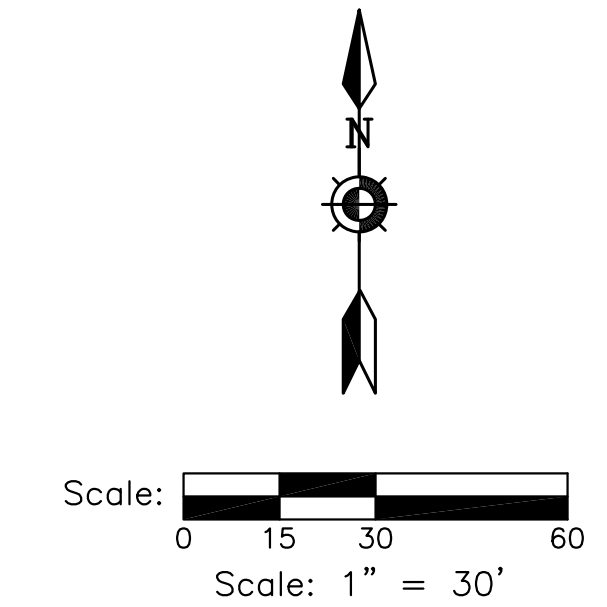
PROJECT LIMITS

SUB SLAB VAPOR MITIGATION SYSTEM TO BE CONSTRUCTED OF 4" SCHEDULE 40 PERFORATED PVC PIPE USING STANDARD SCHEDULE 40 FITTINGS FOR ALL CONNECTIONS. ALL VAPOR MITIGATION WORK TO BE PERFORMED BY INTERIOR PLUMBING CONTRACTOR.

RISER LOCATION FOR SUB SLAB VAPOR MITIGATION SYSTEM. RISER PIPE TO BE SOLID SCHEDULE 40 PVC PIPE. COORDINATE RISER LOCATION WITH ARCHITECTURAL PLANS. CONTRACTOR TO TERMINATE RISER PIPE AT A MINIMUM OF 18" ABOVE THE ROOF LINE OR AT LEAST ABOVE THE PARAPET WALL IF APPLICABLE WITH A "GOOSE NECK" FITTING. TYPE OF SYSTEM TO BE DETERMINED IN THE FIELD. CONTRACTOR TO MAKE PROPER ADJUSTMENTS BASED ON THE SYSTEM TYPE.



(X) INTERIOR CONCRETE SLAB OVER VAPOR MITIGATION PIPING  
N.T.S.



Office Locations:  
Milwaukee  
829 S. 1st Street  
Milwaukee, Wisconsin 53204  
T: 414.226.0200  
Sheboygan  
1227A North 8th Street  
PO Box 955  
Sheboygan, Wisconsin  
53082  
T: 920.459.4200  
www.brayarch.com



Project Title:  
NEW BUILDING FOR:  
CRISTO REY JESUIT HIGH SCHOOL  
CRISTO REY - MILWAUKEE  
1818 W. NATIONAL AVE. MILWAUKEE, WI 53024

REVISIONS:

DATE	DESCRIPTION

Project Number:  
3367

Issued For:  
CONSTRUCTION DOCUMENTS  
04242919

Sheet Title:  
VAPOR MITIGATION SYSTEMS PLAN

Sheet Number:  
C1.5C





## **TABLES**





## Daily Cover

Date	Manifest	Ticket #	Material	Carrier	Tons/Tonnes	Material Quantity	Unit
6/3/2020	DC133614WI	1843334	Contaminated Soil	WI Orchard Ridge LF	71	22.4	TON
6/3/2020	DC133614WI	1843339	Contaminated Soil	WI Orchard Ridge LF	6	21.63	TON
6/3/2020	DC133614WI	1843341	Contaminated Soil	WI Orchard Ridge LF	71	21.27	TON
6/3/2020	DC133614WI	1843346	Contaminated Soil	WI Orchard Ridge LF	9	24.79	TON
6/3/2020	DC133614WI	1843377	Contaminated Soil	WI Orchard Ridge LF	109	20.52	TON
6/3/2020	DC133614WI	1843398	Contaminated Soil	WI Orchard Ridge LF	71	25.41	TON
6/3/2020	DC133614WI	1843401	Contaminated Soil	WI Orchard Ridge LF	6	23.48	TON
6/3/2020	DC133614WI	1843405	Contaminated Soil	WI Orchard Ridge LF	71	20.01	TON
6/3/2020	DC133614WI	1843412	Contaminated Soil	WI Orchard Ridge LF	9	22.85	TON
6/3/2020	DC133614WI	1843448	Contaminated Soil	WI Orchard Ridge LF	109	19.39	TON
6/3/2020	DC133614WI	1843459	Contaminated Soil	WI Orchard Ridge LF	71	21.37	TON
6/3/2020	DC133614WI	1843465	Contaminated Soil	WI Orchard Ridge LF	71	16.82	TON
6/3/2020	DC133614WI	1843472	Contaminated Soil	WI Orchard Ridge LF	6	20.91	TON
6/3/2020	DC133614WI	1843484	Contaminated Soil	WI Orchard Ridge LF	9	22.15	TON
6/3/2020	DC133614WI	1843511	Contaminated Soil	WI Orchard Ridge LF	109	18.22	TON
6/3/2020	DC133614WI	1843520	Contaminated Soil	WI Orchard Ridge LF	71	19.61	TON
6/3/2020	DC133614WI	1843527	Contaminated Soil	WI Orchard Ridge LF	6	24.13	TON
						<b>364.96</b>	

Bioremediation

Date	Manifest	Ticket #	Material	Carrier	Tons/Tonne	Unit
8/28/2019	V131509WI	8533232	Special Waste containing VOCs	WI Orchard Ridge LF	23.76	TON
8/28/2019	V131509WI	8533233	Special Waste containing VOCs	WI Orchard Ridge LF	22.02	TON
9/30/2019	V131509WI	8533238	Special Waste containing VOCs	WI Orchard Ridge LF	18.74	TON
9/30/2019	V131509WI	8532240	Special Waste containing VOCs	WI Orchard Ridge LF	18.11	TON
9/30/2019	V131509WI	8533234	Special Waste containing VOCs	WI Orchard Ridge LF	17.32	TON
9/30/2019	V131509WI	8533245	Special Waste containing VOCs	WI Orchard Ridge LF	21.4	TON
9/30/2019	V131509WI	8533237	Special Waste containing VOCs	WI Orchard Ridge LF	17.44	TON
9/30/2019	V131509WI	8533246	Special Waste containing VOCs	WI Orchard Ridge LF	19.32	TON
9/30/2019	V131509WI	8533242	Special Waste containing VOCs	WI Orchard Ridge LF	18.51	TON
9/30/2019	V131509WI	8533236	Special Waste containing VOCs	WI Orchard Ridge LF	18.98	TON
10/30/2019	V131509WI	8533244	Special Waste containing VOCs	WI Orchard Ridge LF	17.46	TON
10/30/2019	V131509WI	8533247	Special Waste containing VOCs	WI Orchard Ridge LF	19.13	TON
10/30/2019	V131509WI	8533248	Special Waste containing VOCs	WI Orchard Ridge LF	21.03	TON
10/30/2019	V131509WI	8533254	Special Waste containing VOCs	WI Orchard Ridge LF	19.53	TON
10/30/2019	V131509WI	8533253	Special Waste containing VOCs	WI Orchard Ridge LF	19.38	TON
10/30/2019	V131509WI	8533252	Special Waste containing VOCs	WI Orchard Ridge LF	24.32	TON
10/30/2019	V131509WI	8533250	Special Waste containing VOCs	WI Orchard Ridge LF	23.72	TON
10/30/2019	V131509WI	8533251	Special Waste containing VOCs	WI Orchard Ridge LF	20.67	TON
10/30/2019	V131509WI	8533249	Special Waste containing VOCs	WI Orchard Ridge LF	25.85	TON
10/30/2019	V131509WI	8533256	Special Waste containing VOCs	WI Orchard Ridge LF	21.01	TON
10/30/2019	V131509WI	8533257	Special Waste containing VOCs	WI Orchard Ridge LF	22.54	TON
10/30/2019	V131509WI	8533255	Special Waste containing VOCs	WI Orchard Ridge LF	22.9	TON
					<b>453.14</b>	



# PHOTOGRAPHS



## PHOTOGRAPHIC LOG

Photo # 1	Date 09/30/19	
<p><b>Description</b> Subject Property: Typical soils being excavated and reused onsite per approved MMP. Note very wet surface conditions (facing west).</p>		

Photo # 2	Date 10/02/19	
<p><b>Description</b> Subject Property: Typical soils being excavated and reused onsite per approved MMP (facing southwest).</p>		


## PHOTOGRAPHIC LOG

Photo # 3	Date 10/02/19	
<p><b>Description</b> Subject Property: Typical soils being excavated and reused onsite per approved MMP. (facing SE).</p>		

Photo # 4	Date 10/02/19	
<p><b>Description</b> Subject Property: Excavation of petroleum impacted soils encountered. (facing E).</p>		

## PHOTOGRAPHIC LOG

Photo # 5	Date 09/30/19	
<p><b>Description</b> Subject Property: Showing completed rough grading and compact in areas of contaminated soil excavation (facing NE).</p>		

Photo # 6	Date 01/15/20	
<p><b>Description</b> Subject Property: Typical perforated PVC section of sub-slab vapor mitigation system installed.</p>		

## PHOTOGRAPHIC LOG



Photo # 7	Date 01/12/20	
<p><b>Description</b></p> <p>Subject Property: Typical installation and backfill material utilized in the sub-slab vapor mitigation system installation (facing north).</p>		 An aerial photograph of a construction site. The ground is covered with a layer of light-colored gravel. A white pipe runs horizontally across the middle of the frame. To the left of the pipe, there is an orange and white striped traffic cone. In the upper left corner, a yellow excavator is partially visible. The background shows a dirt area and some construction equipment.

Photo # 8	Date 04/07/21	
<p><b>Description</b></p> <p>Subject Property: Wind driven turbine ventilation fan connected to riser section of sub-slab vapor mitigation system. Note electric cabling on roof top to allow for conversion to active status if conditions would change and needed in future.</p>		 A close-up photograph of a wind turbine ventilation fan. The fan is silver and black, with a white riser pipe extending from it. The fan is mounted on a surface of light-colored gravel. A black electrical conduit is visible, connected to the fan's base. The background shows more gravel and a portion of a blue structure.

## PHOTOGRAPHIC LOG



Photo #	Date	
9	04/07/21	
<b>Description</b>		
Subject Property: Completed building and grounds construction (facing east).		

Photo #	Date	
10	04/07/21	
<b>Description</b>		
Subject Property: Completed building and grounds construction looking from adjoining SW property (facing northeast).		



## PHOTOGRAPHIC LOG


Photo #	Date	
11	04/07/21	
<b>Description</b>		
Subject Property: Area of ERP identified limited impacted soil north of stormwater inlet located under concrete sidewalk and asphalt drive (facing north).		

Photo #	Date	
12	04/07/21	
<b>Description</b>		
Subject Property: Completed greenspace area looking from main building entrance (facing west).		

## PHOTOGRAPHIC LOG


Photo #	Date	
13	04/07/21	
<b>Description</b> Subject Property: Completed building and grounds construction looking from adjoining city sidewalk (facing southeast).		

Photo #	Date	
14	04/07/21	
<b>Description</b> Subject Property: Completed sports field and adjacent grounds looking from building east exterior (facing southeast).		