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March 10, 2023

Mr. Andrew Stith
Cristo Rey Milwaukee NMTC SP
1818 W. National Ave.
Milwaukee, WI 53204
Electronic mail only to astith@cristoreymilwaukee.org

SUBJECT: Review of Site Investigation and Remedial Action Report
Cristo Rey Jesuit High School – Historic Fill, 1818 W. National Ave., Milwaukee
BRRTS #02-41-583465, FID #241878450

Dear Mr. Stith:

On February 21, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation and Remedial Action Report* (Report), prepared and submitted by Kapur Inc. (Kapur) on your behalf. On August 16, 2022, the DNR received the fee for a formal review and response. The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716 and Wis. Admin. Code ch. NR 724.

The site is comprised of a number of small, formerly residential and commercial parcels that were combined into the current 7.6-acre property that was most recently a grocery store. Kapur collected soil samples from 15 of 23 borings that were advanced on this property prior to redevelopment. Historic fill material was encountered in 16 of the 23 borings, which consists of silty sand and gravel and silty clay soil that includes anthropogenic materials identified as cinders, asphalt rubble, brick, glass and concrete fragments, foundry materials and organic matter. Fill material was observed from zero to 11.5 feet below ground surface, with underlying native soil consisting of sand and silty sand to lean clay. The fill material was identified as the source of polycyclic aromatic hydrocarbons (PAHs) and metals contamination in soil. Due to the large property footprint, varied past uses and potential filling over time, there is the possibility that contaminated fill could be encountered anywhere on the property. Therefore, it is inferred that contamination may also be encountered anywhere on the property.

The site has been redeveloped as a high school with parking lots, landscaped areas and a soccer field with an artificial turf surface. During construction activities, 818.10 tons of soil with higher PAH and lead concentrations was excavated from the southwest portion of the property and disposed at a licensed landfill. The DNR also approved removing contaminated soil from other areas of the site and placing it beneath the footprint of the new building, which serves as an impermeable cap in that area. The surface features will be maintained as a cap to prevent direct contact and limit infiltration of water through contaminated soil on the property.

The DNR reviewed the Report for compliance with Wis. Admin. Code ch. NR 716 and has determined that additional site investigation is not needed at this time. Maintenance of a cap across the site is an appropriate final remedial action that addresses the risk associated with residual soil contamination by preventing direct contact and minimizing precipitation infiltration. The following comments are for consideration when preparing the request for case closure:

1. Sheet Number 6, Historic BRRTS Case Location Map, included in Kapur's correspondence dated September 17, 2021, identifies the locations of five closed leaking petroleum underground storage tank

(LUST) sites that are present on this property. It is recognized that the volatile organic compounds (VOCs) detected in soil are likely associated with one or more of these closed LUST sites. Therefore, the closure request should identify the VOCs as residual contamination at the closed sites and not associated with the fill material source contaminants consisting of PAHs and metals. VOCs should not be included on contaminant maps for this site.

2. For the closure request documentation, Sheet Number B.2.a.i, Site Investigation PAH Soil Contamination, Sheet B.2.a.ii, Site Investigation Metals Soil Contamination, and Sheet Number B.3.a, Geologic Cross-Section Overview must be revised to indicate that PAHs and metals may be encountered across the entire property, and not just in the small areas that are outlined on these figures. It is noted that the entire property was outlined on Sheet Number B.5, Residual Soil Contaminant Map.
3. The final Cap Maintenance Plan must include a description of the construction of the landscaped areas and how they are protective for direct contact with contaminated soil. References to VOCs should be removed from the description of contamination in this plan.
4. The revised Sheet Number D.2, Site Layout Map, submitted on February 22, 2023, is acceptable for depicting the cap features.

Kapur included an emerging contaminants assessment, specifically, an evaluation of potential past manufacturing, storage or use of per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane on this property. The DNR concurs with Kapur's conclusion that PFAS and 1,4-dioxane testing is not needed to complete the investigation of the discharge from the fill material at this site.

The DNR appreciates your efforts to protect Wisconsin's environment. If you have any questions regarding this letter, please contact me at linda.michalets@wisconsin.gov or at 414-435-8010.

Sincerely,

Linda Michalets
Hydrogeologist
Remediation and Redevelopment Program

cc: Grant Zwiefelhofer, Kapur Inc. (gzwiefelhofer@kapurinc.com)