



February 12, 2020

JUNE EVANS
BMO HARRIS BANK
111 W. MONROE ST
CHICAGO, IL 60603

SUBJECT: Site Investigation Report
BMO Harris Bank Branch Property
900 E Main St, Merrill, WI
DNR BRRTS Activity #: 02-35-584409

Dear Ms. Evans:

On December 16, 2019 the Wisconsin Department of Natural Resources (DNR) received a Site Investigation Report (SIR) from Mr. Patrick Patterson of Professional Service Industries, Inc (PSI). The SIR was submitted on behalf of BMO Harris Bank for the BMO Harris Bank Branch, 900 E. Main St., Merrill, BRRTS ID 02-35-584409 (Property). Along with the SIR was a DNR form 4400-237 Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request and a fee, as per Wis. Admin. Code NR 749, requesting a formal review of the SIR by the DNR. This correspondence is in response to the technical assistance request.

The Property is an approximate 0.8-acre commercial property consisting of two parcels divided by a paved alley right-of-way. The BMO Harris Bank building is located south of the alley on the corner parcel adjacent to S. Mill Street and E. Main street. A drive-thru window building structure and parking area is situated to the north of the alley and is bound by a concrete retaining wall. Asphalt parking areas are generally located within the northeast portion of the parcel. Landscaped areas are present in the southwest and northwest property corners.

Historically, the northern parcel had been occupied by a dry-cleaning facility with a gasoline underground storage tank (UST) and an automotive repair shop. Property use and UST were identified in PSI's Phase I Environmental Site Assessment (ESA) report as a Recognized Environmental Condition (REC) in connection to the Property. Due to potential contamination, BMO Harris Bank retained PSI to perform additional investigations. A Phase II ESA concluded that soil and groundwater contamination above DNR soil and groundwater quality standards is present on the Property. The contaminants encountered consisted of Polynuclear Aromatic Hydrocarbons (PAHs), Tetrachloroethene (PCE), Cadmium, and Lead. As a result of the encountered contamination additional site investigation activities were performed to determine the degree and extent of contamination.

Site Investigation Activities

The following is a list of site investigation activities:

- On July 1, 2019 – ESA Phase II
 - Four (4) soil probes placed on the Subject Property (SP-1 through SP-4).
 - Four (4) soil samples and (4) grab water samples were collected and submitted for laboratory analysis of PAHs, VOCs, RCRA metals.
- On August 8-9, 2019 – Supplemental ESA Phase II
 - Eight (8) additional probes were placed generally around the previous soil probes.
 - SP-5 through SP-12

- Nine (9) selected soil samples were collected and submitted for laboratory analysis of PAHs, VOCs, RCRA metals.
- Three (3) of the probes were converted to NR141-compliant groundwater monitoring wells
 - MW-1 through MW-3 were tested for the presence of VOCs, and dissolved Lead
- On October 29, 2019 – Site Investigation
 - Five (5) additional soil probes were placed strategically around previous probes
 - SP-13 through Sp-17
 - Five (5) soil samples were collected and submitted for laboratory analysis of PAHs.
 - Three (3) Groundwater samples were collected from MW-1 through MW-3
 - GW samples were tested for the presence of VOCs, PAHs, and Cadmium.

Site Investigation Review

The site investigation activities identified soil impacts above the groundwater pathway and/or the direct contact Residual Contaminant Levels (RCLs) for PAHs, VOCs, and metals. The extent of soil contamination has been defined in the upper five feet of fill material north of the existing retaining wall and the alleyway. PCE and two PAHs were detected in two water samples at concentrations above the ch. NR140 Wis. Adm. Code groundwater quality standards Preventive Action Limits (PALs). No exceedances of the NR 140 Enforcement Standards were found in ground water sampling activities.

After initial DNR review of the Site Investigation Report (SIR), an email was provided to PSI on January 22, 2020, outlining revisions needed for the report. The DNR requested this information be submitted as an addendum to the SIR. The following revisions/additions were requested: physical characteristics of the Property, MW Installation & Development Procedures, and identification of nearby public/private wells & utilities. On January 24, 2020, PSI provided the DNR with the requested revisions in a document titled *Addendum to Site Investigation Report*.

The DNR has reviewed the following documents:

- Supplemental Phase II Environmental Site Assessment, dated September 20, 2019 and prepared by PSI.
- NR 716 Site Investigation Work Plan, dated October 18, 2019 and prepared by PSI.
- NR 716 Site Investigation Report, dated December 10, 2019 and prepared by PSI.
- NR 716 Site Investigation Report – Addendum, dated January 24, 2020 and prepared by PSI.

Based on the information contained in the above referenced submittals and the clarification provided in the Addendum to the Site Investigation report, the DNR believes the Site investigation activities are adequate to determine appropriate actions to address the identified hazardous substance discharges. The DNR may request additional site investigation activities if information becomes available that the current site investigation was not adequate to determine the extent and degree of contamination or if additional hazardous substance discharges are discovered.

If you have any questions, please contact me at (715) 623-4190 ext. 3109 or aaron.zielsdorf@wisconsin.gov.

Sincerely,



Aaron Zielsdorf
Hydrogeologist - Remediation & Redevelopment Program
Northern Region

cc: Patrick Patterson, Intertek-PSI
Larry Raether, Intertek-PSI
Joaquin Camacho, BMO Harris Bank