



Sent Electronically to Jane.Pfeiffer@Wisconsin.gov and Uploaded to the WDNR Document Portal

Jane K Pfeiffer
Hydrogeologist
Wisconsin Department of Natural Resources
2300 North Dr. Martin Luther King Jr Drive
Milwaukee, WI 53212-3128

**WDNR SITE INVESTIGATION RESPONSE ACKNOWLEDGEMENT LETTER
BETA-BECHER ACQUISITION CO, LLC HISTORIC FILL SITE
147 EAST BECHER STREET ("site")
MILWAUKEE, WISCONSIN
BRRTS 02-41-589088**

Dear Ms. Pfeiffer:

This letter was prepared in response to the Wisconsin Department of Natural Resources (WDNR) letter titled *Site Investigation Review for Beta Becher Acquisition Co, LLC Historic Fill Site* dated July 11, 2023. Ramboll US Consulting, Inc. (Ramboll) prepared this response on behalf of Bear Development, LLC (Bear). The following paragraphs respond to each of the WDNR, requests:

July 20, 2023

Ramboll
234 West Florida St., 5th Floor
Milwaukee, WI 53204
USA

Phone: 414-837-3607
Fax: 414-837-3608
www.ramboll.com

Ref. 1690023383

A. Soil

- i. As requested in the DNR's April 14, 2022, letter, considering the source of contamination for this site is site-wide historical fill material, extend the Wis. Admin. Code ch. NR 720 residual contaminant level (RCL) exceedance lines for soil to the site boundaries for all soil contamination identified to date (i.e., volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons, metals, and polychlorinated biphenyls). Include updated figures in future submittals.***

The Residual Contaminant Level will be extended to the property boundaries, which will be shown in future submittals.

B. Groundwater

- i. Perfluorooctanoic acid (PFOA) and/or perfluoro-1-octanesulfonic acid (PFOS) were identified above the proposed preventive action limit in groundwater at temporary well locations TW-3, TW-7, TW-10, and TW-14. Based on the current information provided to the DNR, further investigation of PFOS and PFOA in groundwater needs to be conducted***

Five Wisconsin Administrative Code (WAC) groundwater monitoring wells will be installed at the site boundaries and in the middle of the site after completion of site grading activities. These wells will be sampled for PFOS and PFOA following the request. We note that groundwater cannot be used

for potable purposes in the vicinity of the site and as such no corrective action activities are anticipated. These wells will be abandoned after sample results are received to facilitate the redevelopment of the site.

- ii. 1,1,1- Trichloroethane (1,1,1-TCA) was detected in soil, groundwater, and sub-slab vapor across the site. 1,4-dioxane is an emerging contaminant that is considered a concomitant with 1,1,1-TCA. Include 1,4-dioxane in future groundwater sampling events.**

The five WAC wells that will be installed in response to Comment B.ii. will be sampled for 1,4-dioxane.

C. Vapor

- i. Due to the detections of VOCs identified in soil, groundwater, and sub-slab vapor at the site and the proximity of contamination to the proposed buildings, vapor sampling is warranted after the construction of the proposed buildings is complete. Perform sub-slab vapor sampling at each of the proposed buildings after construction is complete to determine the concentrations of contaminants in sub-slab vapors. The results of the vapor sampling should be evaluated to determine whether additional sampling, mitigation of the vapor intrusion pathway, and remedial action are warranted. The DNR strongly recommends the vapor sampling requested above before building occupancy to avoid potential exposure of future occupants.**

As previously presented to WDNR, a passive vapor mitigation system consisting of a sub-slab ventilation piping and an unwelded vapor barrier will be installed beneath the buildings. After construction, vapor sampling will be conducted to evaluate existing sub-slab vapor concentrations to determine if additional vapor sampling or/and remedial action (in the form of attaching blowers to the vents) are warranted. Bear will complete the sampling before building occupancy.

Demolition activities are currently ongoing at the facility. Removal of the existing slabs will occur upon approval of WDNR. Ramboll will install the WAC groundwater monitoring wells after the final grading but before the final site paving is completed. The sub-slab soil vapor sampling will be coordinated after the new building's concrete floor slabs are completed. Ramboll/Bear will keep the WDNR apprised of the project's construction status and submit the results of any sampling compliant with WAC NR 716.14(2). Please do not hesitate to contact either on the undersigned with questions or comments regarding this project.

Sincerely yours,



Richard Mazurkiewicz
Managing Consultant

D 262 901 3502
rmazurkiewicz@ramboll.com



Daniel W. Petersen, Ph.D., P.G.
Principal

D 312.288.3883
dpetersen@ramboll.com