



February 15, 2023

Cecelia Annex LLC
Attn: Rick Wiegand
624 North 24th Street
Milwaukee, WI 53233

Subject: Site Investigation Report/Remedial Action Plan Approved
2724-2734 W Wells St Historic Fill
817-831 North 27th Street and 2734 West Wells Street, Milwaukee, WI
DNR BRRTS Activity #: 02-41-591126
FID #: 341347600

Dear Mr. Wiegand:

The Wisconsin Department of Natural Resources (DNR) reviewed your request for approval of the *Site Investigation Report and Remedial Action Plan* (Report) for the above-mentioned site prepared by your consultant, The Sigma Group (Sigma). The submittal was reviewed for regulatory compliance, as this site is subject to regulation under Wis. Stat. ch. 292. The site investigation (SI) portion of the Report was reviewed for compliance with Wis. Admin. Code ch. NR 716, and the remedial action (RA) portion was reviewed for compliance with Wis. Admin. Code ch. NR 722. The DNR has determined that the site investigation addressing historic fill materials is complete and that the proposed remedial action to construct a new parking lot as an impervious barrier is approved. The DNR's comments related to the Report are presented below.

Background

The almost 28,000 square feet building on site was constructed in the 1920s with two floor drains installed on the ground floor in the 1940s. The building has been used for various commercial purposes, most notably as an auto repair shop in the mid-20th century. The Site Investigation (SI) included soil, groundwater, and vapor sampling. Samples were analyzed for volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), and RCRA metals. SI results indicate that there is more than one source and type of contamination present on the site. For this reason, the DNR has determined that more than one case will be assigned to address the varying contaminants and sources. The BRRTS number assigned to this case will address the PAH contamination related to the historic fill. The BRRTS number 02-41-589189 will address VOC contamination related to former auto repair operations. The Materials Management Plan (MMP) addresses the movement and reuse of soil with impacts related to the historic fill. The DNR's decision regarding the MMP will be addressed in another letter. The DNR's decision regarding the SI for the VOC contamination will be addressed in another letter.

Site Investigation Summary

Sigma conducted an SI to characterize the degree and extent of impacts to soil identified during the Phase II Environmental Site Assessment, and potential impacts to groundwater and vapor intrusion. The SI results identified various petroleum volatile organic compounds (PVOCs), PAHs, and RCRA metals at concentrations exceeding Residual Contamination Levels in soil samples. PAHs identified in soil are located beneath the parking lot on site and are also present in boring location SB-21 which is located within the building. Undocumented historically placed fill is a common issue in urban settings within Milwaukee County. Therefore, it is likely that contaminated undocumented historic fill is present across the whole property due to the presence of fill in soil borings.

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Remedial Action Plan Summary

The DNR requires design plans and specifications complying with Wis Admin. Code § NR 724.09 and 724.11 for each remedial action or interim action selected for the site. The proposed remedial action for this contamination is to construct a new parking lot after site redevelopment has taken place to provide an impervious barrier to the direct contact risk caused by contaminants present within the historic fill. The DNR concurs with the proposed remedial action plan.

Emerging Contaminants

The DNR has reviewed the *Emerging Contaminants Evaluation* and concurs with the conclusion that further evaluation or investigation is not warranted at this time.

Conclusion

Based on the review of documentation for SI activities for this BRRTS case, the DNR concurs that the degree and extent of historic fill related contamination identified at the site has been adequately evaluated and documented with respect to Wis. Admin. Code ch. NR 716 and that the SI is complete. The site investigation approval is granted for the PAHs and RCRA metal contaminants analyzed during the site investigation, as documented in the case file. Additionally, the DNR has determined that the proposed remedial action to construct a parking lot as an impervious barrier is approved. A Historic Fill Exemption Approval will be required before earthwork and building construction begin.

The DNR appreciates the efforts you are taking to investigate and remediate this site. If you have any questions, please contact me, the DNR Project Manager, at (262) 612-9127 or by email at hera.hulsey@wisconsin.gov.

Sincerely,



Hera Hulsey
Hydrogeologist
Remediation and Redevelopment
Southeast Region

cc: Stephen Meer, P.E., Sigma (electronic)