



May 18, 2021

Roers Companies  
c/o: Mr. Shane LaFave  
110 Cheshire Lane  
Suite 120  
Minnetonka, MN 55305

Subject: Review of Site Investigation Work Plan  
Community Within the Corridor – East Block  
2748 North 32nd Street, Milwaukee, WI 53208  
BRRTS #: 02-41-263675, FID #: 241025400

Dear Mr. LaFave:

On April 19, 2021, the Wisconsin Department of Natural Resources (DNR) received *Site Investigation Work Plan*, dated April 14, 2021, prepared on your behalf by K. Singh and Associates, Inc. (K. Singh) for the above-referenced site. This submittal was presented with a Technical Assistance fee of \$700 for DNR review and response. On April 28, 2021, the DNR requested additional information regarding the potential sources of contamination at this site, and on April 30, 2021, the additional information was received (collectively, the SIWP). The DNR reviewed the SIWP for regulatory compliance with Wis. Administrative Code §§ NR 716.07 and NR 716.09, as this site is subject to regulation under Wis. Stat. ch. 292 and has determined that the SIWP cannot be approved at this time. The purpose of this letter is to present the DNR's review of the SIWP.

### Background

The property is 4.16 acres in size and is covered by paved parking lots and driveways (courtyards) and a multi-building facility (collectively, the building) that was constructed in the early 1900s. The property was originally used by Romadka Brothers Co. to manufacture trunks, suitcases, and travel bags. By 1951, the property was occupied by a Briggs and Stratton factory, which manufactured engines.

On January 11, 2001, the DNR was notified of petroleum volatile organic compound (VOC), chlorinated VOC and polycyclic aromatic hydrocarbon (PAH) environmental contamination related to historical underground storage tanks (USTs) formerly located in the northern courtyard on the property. On August 26, 2008, the site was closed with land use limitations (i.e., continuing obligations). In preparation for site redevelopment, a *Request for Post Closure Modification* (PCM Request), dated July 8, 2020, was prepared and submitted by K. Singh. Subsequent site investigation indicated that there are likely additional source areas on the site that were not previously investigated as a part of the 2008 case closure. On April 6, 2021, the DNR re-opened the site and sent you a letter outlining your responsibilities to address the environmental contamination at the site.

The recent site investigation activities (post-2008 case closure) completed to-date have identified chlorinated and petroleum VOCs, PAHs, RCRA metals and polychlorinated biphenyls (PCBs) in the soil, groundwater and/or vapor at concentrations greater than their respective Wis. Admin. Code ch. NR 720 soil residual contaminant levels (RCLs), Wis. Admin. Code ch. NR 140 preventive action limits (PALs) and/or enforcement standards

(ESs), and vapor risk screening levels (VRSLs). In the SIWP, K. Singh indicates the potential sources of the contamination that were not previously investigated as a part of the 2008 case closure are likely related to the historical industrial factory operations that occurred in building 1B (see *Briggs and Stratton Industrial Campus* figure, enclosed). According to the 1910 and 1926 Sanborn Maps (enclosed), historical operations in building 1B generally included painting, staining, sealing, and general use as a machine shop.

#### Proposed Scope of SIWP

In summary, K. Singh states that the scope and objective of the SIWP is to characterize the nature, degree and extent of contamination in soil and groundwater at the site, specifically focusing on the exterior of the building footprint. To accomplish this, K. Singh proposes the following additional work:

1. Install five soil probes to 10 feet (ft) below ground surface (bgs) and five soil borings to 30 ft bgs outside of the building footprint throughout the site. The exact locations of the soil borings may be modified based on accessibility, the presence of utilities and construction activities ongoing at the site. Two soil samples will be collected from each boring and lab analyzed for VOCs, PAHs, SVOCs, PCBs, pesticides and herbicides.
2. Install Wis. Admin. Code ch. NR 141-compliant monitoring wells in six of the soil borings. The proposed well screens are planned to be 15 ft long and the well screen depths are estimated to be between 8 –23 ft bgs. Four rounds of groundwater samples will be collected, and lab analyzed for VOCs, PAHs, and SVOCs.
3. Perform a utility vapor survey by using a photoionization detector (PID) to screen for VOCs in the curb and catch basins and manholes within North 32<sup>nd</sup> Street and North Center Street adjacent to the site. Additionally, the grounds and the building will be checked for existing manholes and sewer cleanouts and will also be screened for VOCs using a PID. K. Singh states that if the PID readings are greater than or equal to 10 instrument units, then vapor samples will be collected, and lab analyzed for VOCs.

#### DNR Review of the SIWP

Based on the DNR's review of the SIWP, the DNR provides the following comments and recommendations:

1. Soil investigation
  - a. The extent and degree and soil contamination has not been defined near the potential source areas in building 1B. Additionally, the proposed soil boring locations have not been adequately justified. It appears that several of the proposed soil boring locations are in areas of the site that have already been investigated and/or are not located near the potential sources of contamination in building 1B.
    - i. Provide justification for each proposed soil boring location to explain how the location is expected to contribute to the goal of the site investigation. Furthermore, include additional soil boring locations near the potential sources of contamination in building 1B. Prepare updated figures, as applicable.
    - ii. K. Singh previously indicated that it is not possible to perform sampling inside the building due to poor accessibility. If K. Singh concludes that sampling cannot occur in the building, then provide documentation (i.e., photos, discussion of building dimensions vs. equipment size, etc.) for the building as a structural impediment to the site investigation. Specifically include documentation for building 1B.

- iii. The potential sources of contamination are in building 1B and the area with the highest known concentration of contamination is in the western section of building 1B. If soil borings cannot be conducted inside the building to better define the potential source areas, additional soil borings should be placed along the sidewalk immediately to the west of building 1B to help to define the degree and extent of contamination related to the potential source areas in building 1B. Provide updated figures, as applicable.
- b. Based on *Proposed Modification of Vapor Mitigation / Extraction System for Community Within the Corridor – East Block* report, dated April 29, 2021, the DNR understands that K. Singh plans to excavate soil under a section of building 1B. The DNR recommends that confirmation samples be collected during this excavation to better investigate the potential source areas and to help define the nature, extent and degree of soil contamination. If soil borings can be conducted in this area at that time, DNR recommends collection of deeper soil samples to help define the vertical degree and extent of soil contamination in this suspected source area.
- c. Considering the historical industrial operations at this site, the DNR recommends that the soil samples be lab analyzed for RCRA metals in addition to the constituents proposed by K. Singh.

## 2. Groundwater investigation

- a. The extent and degree of groundwater contamination has not been defined near the potential source areas in building 1B. Therefore, include additional monitoring well locations near the potential sources of contamination in building 1B. Prepare updated figures, as applicable.
- b. Consistent with the feedback provided above, if monitoring wells cannot be installed inside the building, the DNR recommends that Wis. Admin. Code ch. NR 141-compliant monitoring wells be installed immediately to the west of building 1B to further investigate the potential source areas and to help define the nature, extent and degree of groundwater contamination.
- c. Considering the historical industrial operations at this site, the DNR recommends that the groundwater samples be lab analyzed for dissolved metals in addition to the constituents proposed by K. Singh.
- d. Provide justification for the depth and length of the well screens and, more specifically, discuss the strategy for the submerged wells screens. This justification should consider that contamination identified at the water table is important for understanding vapor intrusion.

## 3. Utility survey:

- a. The DNR does not recommend the use of a PID to survey the utilities at this site and in nearby curb and catch basins and manholes, as this is not a quantitative measurement. Alternatively, the DNR recommends the collection of vapor samples for lab analysis from these locations. Propose a quantitative sampling method for the utility survey.
- b. Provide a figure that shows the proposed sample locations, both on-site and off-site, for the utility survey.
- c. The DNR understands that the layout of the historical utilities is not known. If the layout of the historical utilities is identified in the future, then this information must be submitted to the DNR

and the utilities must be evaluated as a potential pathway for migration of contamination at this site.

- d. The DNR understands that a vapor assessment has occurred in the tunnel that exists to the west of the site beneath North 32<sup>nd</sup> Street. Provide the results and associated discussion for this assessment.

4. Emerging contaminants evaluation:

Provide a more detailed evaluation of emerging contaminants to include any available information on whether the historical site operations used any products containing PFAS in any process services, the duration of PFAS containing product use, the type of PFAS contained in the product, and any areas of the site where PFAS-containing products may have been used, stored, managed, or discarded. This evaluation should consider and incorporate the extent and degree of contamination that has been identified at the site and discuss whether the data indicates that there were discharges related to any of the historical site operations that may have used PFAS containing products. Specifically discuss the individual types of manufacturing operations involved in the historical operations - painting, degreasing, metal working, etc. You may reference the August 17, 2020, DNR letter titled, Reminder to Include Evaluation of Emerging Contaminants in Site Investigation, for additional details on this requirement.

Next Steps

The DNR requests that a revised work plan be submitted to address the above comments within 45 days of the date of this letter, by July 2, 2021. If you have any questions concerning this site or this letter, please contact me, the DNR Project Manager, at (414) 435-8021, or by email at [jane.pfeiffer@wisconsin.gov](mailto:jane.pfeiffer@wisconsin.gov).

Sincerely,



Jane K. Pfeiffer  
Project Manager – Hydrogeologist  
Remediation & Redevelopment Program

Enclosures:

- *Briggs and Stratton Industrial Campus* figure
- 1910 Sanborn Map
- 1926 Sanborn Map

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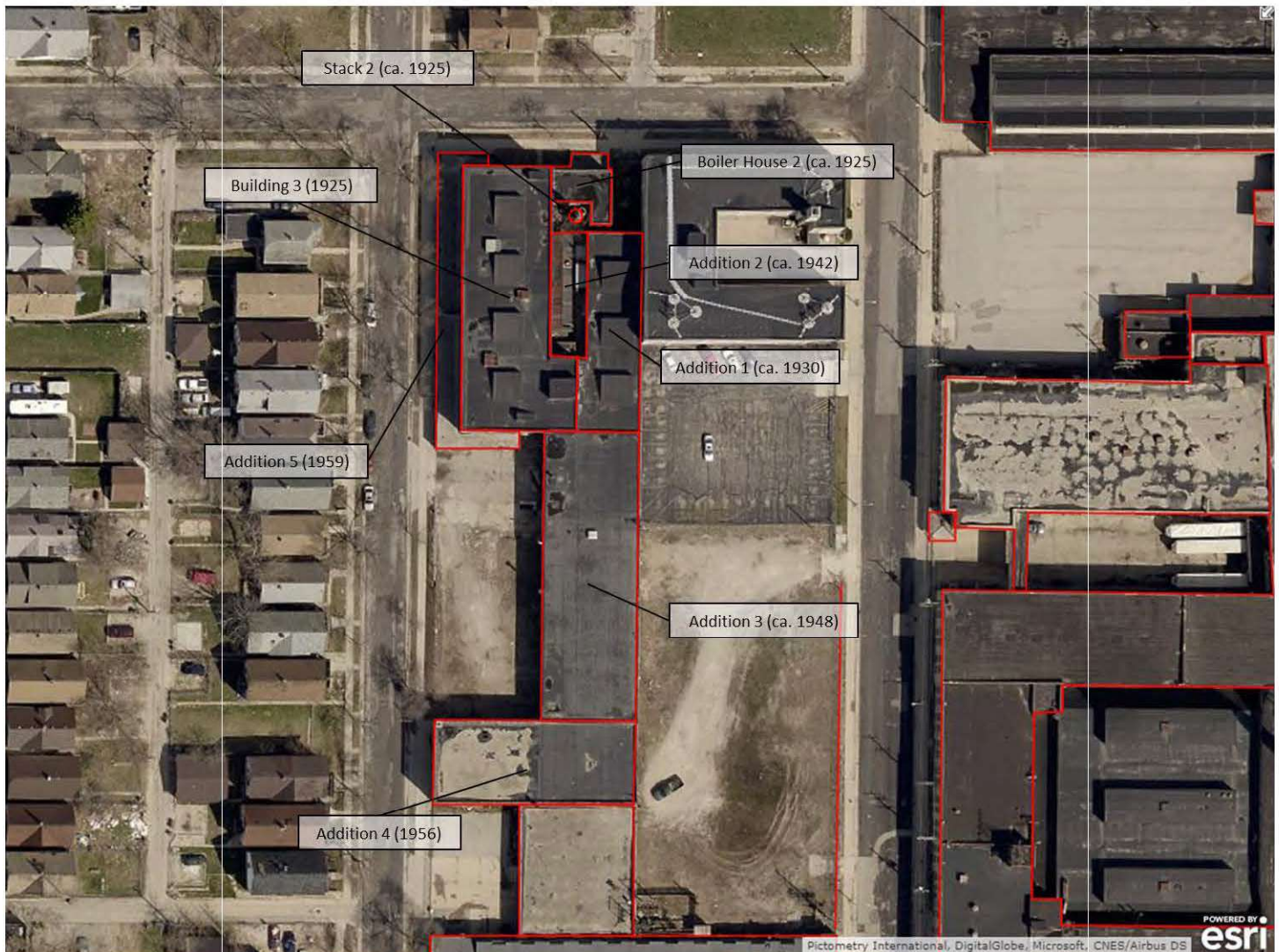
**Briggs and Stratton Industrial Campus**  
**HISTORIC PRESERVATION CERTIFICATION APPLICATION**  
**PART 1 – EVALUATION OF SIGNIFICANCE**

Property name: **Briggs and Stratton Industrial Campus**

NPS Project Number

Property address: **2758 N. 33<sup>rd</sup> St., 3212 West Center St., 2748 N. 32<sup>nd</sup> St., Milwaukee, WI 53210**

**Figure 6: 2758 N 33rd Street (Parcel #309-0503), Site Map**



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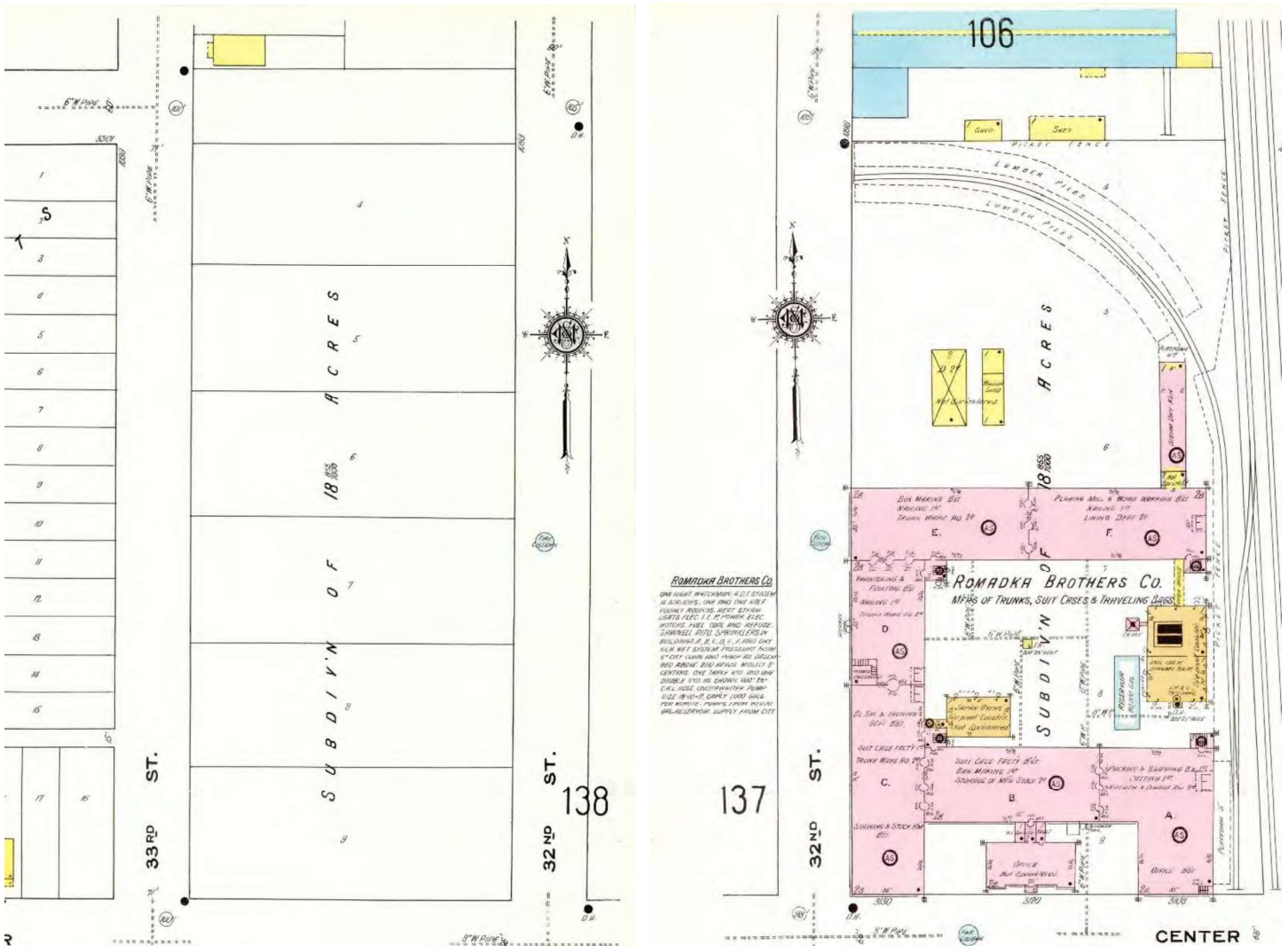
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**Figure 9: 1910 Sanborn Map**

Sanborn Map Company of New York, "Insurance Maps of Milwaukee, WI," *Sanborn Fire Insurance Maps*, (New York: Sanborn Map Company, 1910), pp.137-138.



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**Figure 12: 1910 Sanborn Map (Last Updated 1926)**

Sanborn Map Company of New York , “Insurance Maps of Milwaukee, WI (Last Updated 1926),” *Sanborn Fire Insurance Maps*, (New York: Sanborn Map Company, 1910), pp. 137-138.

