



December 22, 2021

**VIA EMAIL**

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

Subject: Review of Site Investigation Report  
Community Within the Corridor – East Block  
2748 N 32<sup>nd</sup> Street, Milwaukee, WI 53210  
BRRTS #: 02-41-263675, FID #: 241025400

Dear Mr. LaFave:

On November 4, 2021, the Wisconsin Department of Natural Resources (DNR) received a Site Investigation Report (SIR), dated November 2, 2021, prepared by K. Singh and Associates, Inc. (K. Singh) for the site identified above. The SIR was submitted with a Technical Assistance Request fee of \$1050 for DNR review and written response. The DNR has reviewed the SIR for regulatory compliance with Wis. Admin. Code ch. NR 716 and has determined that additional actions and information is needed.

Background

The site encompasses the entire 4.16-acre subject property and is covered by three courtyards (i.e., northern courtyard, central courtyard and southern courtyard) and a multi-building facility (collectively referred to as “the building”), which was constructed between 1900s and the 1960s. The site has been used for various industrial purposes that have included manufacturing suitcases and trunks, lamps and gasoline-powered small engines. A *Notification of Hazardous Substance Discharge* was received by the DNR on January 11, 2001, for soil and groundwater contaminated with petroleum volatile organic compounds (PVOCs), chlorinated VOCs (CVOCs) and polycyclic aromatic hydrocarbons (PAHs). The sources of this contamination were identified as the historical underground storage tanks (USTs) located in the northern courtyard. On August 26, 2008, the DNR issued a *Final Case Closure with Land Use Limitations or Conditions* letter for this site. On April 6, 2021, the DNR re-opened the site after additional data was received that indicated that there were likely additional sources present on this site that were not previously investigated. Construction is underway to redevelop the site into an affordable housing and commercial complex as a part of the Community Within the Corridor project.

Site Investigation (SI) Summary:

SI activities to-date have identified the presence of VOCs, PAHs, metals and polychlorinated biphenyls (PCBs) in the soil, groundwater and/or vapors at the site. CVOCs, including tetrachloroethylene (PCE) and its breakdown products, namely trichloroethene (TCE), PVOCs, PAHs, metals, including lead, arsenic and selenium, and PCB aroclor 1254 have been identified in soil at concentrations greater than their respective Wis. Admin. Code ch. NR

720 groundwater pathway, non-industrial direct contact and/or industrial direct contact residual contaminant levels (RCLs). CVOCs, PVOCs, PAHs and arsenic were identified in the groundwater above their respective Wis. Admin. Code ch. NR 140 preventive action limits (PALs) and/or enforcement standards (ESs). CVOCs, namely TCE, and PVOCs have been identified in sub-slab vapors beneath the building at concentrations greater than their respective residential, small commercial and/or large commercial vapor risk screening levels (VRSLs). TCE, chloroform and benzene has been identified in indoor air samples, collected from three sanitary manholes within the sidewalk of North 32<sup>nd</sup> St. that are connected to sanitary laterals extending to the building, at concentrations greater than their applicable residential vapor action level (VAL).

### Review of SIR

The DNR reviewed the SIR for compliance with Wis. Admin. Code ch. NR 716, and has determined that additional actions and/or information are required to complete the SI, as summarized below.

#### I. Source identification

Wis. Admin. Code § NR 716.01 states that the purpose of SI is to provide the information necessary to define the source(s) of contamination. Furthermore, Wis. Admin. Code § NR 716.07(1) requires that the history of the site or facility, including industrial land uses that may have been associated with one or more hazardous substance discharges, be evaluated.

- A. Discuss the potential source(s) for the PAHs that were identified within the soil and groundwater.
- B. Discuss the potential source(s) for the metals that were identified within the soil and groundwater.
- C. Analysis of soil samples for PCBs was limited to select soil samples located outside of the building footprint. Discuss potential source(s) for the PCB contamination at this site.

#### II. Degree and extent of contamination in all affected media

Wis. Admin. Code § NR 716.11(3)(a) states the purpose of the field investigation is to determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.

##### A. Groundwater

- i. Monitoring well location EB-B-17/MW-1 has been dry since it was installed on May 5, 2021. TCE greater than its industrial direct contact RCL was identified from 16-18 feet below ground surface at this location. To better define the extent and degree of contamination at this location, install a replacement groundwater monitoring well near EB-B-17/MW-1.
- ii. To help to define the extent and degree of groundwater contamination at this site, install Wis. Admin. Code ch. NR-141 compliant monitoring wells or piezometers that are screened immediately above the bedrock surface within the central courtyard's loading dock area and within the southern courtyard's paved driveway area. Should you encounter a shallow/perched groundwater table at these locations, then also install nested monitoring well(s) that are screened within this shallow interval. Groundwater samples from these locations should be lab analyzed for VOCs, PAHs, metals and PCBs.

- iii. Based on the historical Briggs & Stratton manufacturing activities and associated metal plating operations along with the detection of per- and poly-fluoroalkyl substances (PFAS) in soil, collect and analyze groundwater samples for PFAS at sample location MW-6 and from the above-requested monitoring wells within the central and southern courtyards.
- iv. Soil contaminated with 1,1,1- Trichloroethane (1,1,1-TCA) greater than its groundwater pathway RCL was identified at sample locations EB-B-18/MW-2, B-8/TW-3 and VE-2. 1,4-dioxane is an emerging contaminant that is considered a co-contaminant with 1,1,1-TCA along with TCE, which was identified within soil throughout the entire site. Collect and analyze groundwater samples for 1,4-dioxane.
- v. Provide a more detailed discussion on how the groundwater contamination identified in the historical SI relates to the groundwater contamination identified in the current SI. More specifically, discuss how the concentrations have varied over time and what this means for the fate and transport of the identified contamination.

#### B. Soil

- i. Collect soil sample(s) from the replacement well/boring near EB-B-17/MW-1 to help to define the extent and degree of soil contamination at this location. More specifically, collect a deeper soil sample to help to vertically define the soil contamination. Considering the data collected from this sample location, discuss whether the soil contamination may extend off-site.
- ii. To help to define the extent and degree of soil contamination at this site, collect soil sample(s) from within the additional monitoring well locations requested above. These soil samples should be lab analyzed for VOCs, PAHs, metals and PCBs.
- iii. Soil contaminated with TCE greater than its industrial direct contact RCL was identified at sample location EB-B-29, which is located adjacent to the 32<sup>nd</sup> St. right-of-way (ROW). If access allows, collect soil sample(s) immediately adjacent to historical lateral(s) extending to/from the building near EB-B-29. The soil samples should be collected at a similar depth as the laterals. If access does not allow, ensure that confirmation samples are collected along the western edge of the hot spot soil excavation that is underway near EB-B-29. Based on the results of this additional investigation, discuss whether TCE soil contamination may extend into the 32<sup>nd</sup> St. ROW.
- iv. Provide a more detailed discussion on how the soil contamination identified in the historical SI relates to the soil contamination identified in the current SI. More specifically, discuss how the concentrations have varied over time and what this means for the fate and transport of the contamination.

#### C. Vapor

- i. An indoor air sampling program will be required following the installation of the vapor mitigation/extraction system and after the interior construction is completed and HVAC systems are operational. Indoor air samples must also be collected from the basements

throughout the building. The indoor air sampling results should be included within the commissioning plan, as discussed in the next steps outlined below.

### III. Evaluation of potential pathways for migration of contamination

Wis. Admin. Code § NR 716.11(5)(a) states that field investigation must include an evaluation of the potential pathways for migration of the contamination, including drainage improvements, utility corridors, sediments, bedrock and permeable material or soil along which vapors, free product or contaminated water may flow.

#### A. Utility corridors

- i. Additional investigation is required to delineate the vapor impacts identified within the sanitary sewer laterals and main sanitary sewer to assess this conduit as a potential migration pathway for contamination.
  - I. Collect a second round of air samples from the sanitary manhole sample locations IA-1, IA-2 and IA-3.
  - II. Collect an air sample from one sanitary sewer manhole located upgradient of the site and from two sanitary sewer manholes that are both located downgradient of the site, within the appropriate ROW(s). Discuss the results and whether any off-site properties may be impacted by the vapor contamination within this conduit. Provide a work plan, as needed, to address potential off-site contamination.
- ii. Provide a map clearly highlighting the historical/existing laterals, where they are connected to the sewer and/or storm water mains, and the flow direction of the individual main utility lines. Place any vapor sampling results on the map, as appropriate. Indicate the depth of the historic laterals.
- iii. The *Phase II Site Investigation Report*, dated May 2002, submitted for the Jonas Construction site (BRRTS # 02-41-000793), which is located at the subject property, indicates that there is/was a storm sewer that transects the contamination identified in the northern courtyard of the property. Discuss whether this storm sewer lateral still exists and whether it acts as a preferential pathway for off-site migration of contamination. Display this on the map requested above, as applicable.

#### B. Bedrock

- i. Discuss whether the bedrock that was identified at this site may be acting as a preferential pathway for migration of contamination. Justify your response.

#### C. Other building features

- i. The *Briggs and Stratton Industrial Campus - HISTORIC PRESERVATION CERTIFICATION APPLICATION PART 1 – EVALUATION OF SIGNIFICANCE* provided in Appendix B of the SIR, indicates that a tunnel may exist under the north end of the boiler room extending to the basement of Building 1B. Discuss whether the tunnel still exists, and, if so, how it will be abandoned.

- ii. The *1910 Sanborn Map (Last Updated 1926)* provided in Appendix B of the SIR, shows what appears to be a tunnel under central courtyard. Discuss whether the tunnel still exists, and, if so, how it will be abandoned.
- iii. Indicate whether any sumps were identified during the SI. The historical contamination figures provided in Appendices D and E of the SIR show "old pits with debris" and sumps. If sumps do exist at the site, provide a sampling plan for these sumps to help to further define the extent and degree of groundwater contamination and to help to determine whether these sumps or pits are acting as preferential migration pathways for vapor contamination to enter the building.

#### IV. Documentation

- A. Provide soil figure(s) that display RCL exceedance lines for all suites of contaminants identified at this site (i.e., CVOCs, PVOCs, PAHs, metals, and PCBs) to help to present the extent and degree of all soil contamination.
- B. Figure 3 shows select historical soil probe and monitoring well locations. This figure should be updated to show all historical locations. Alternatively, these locations may be provided on a separate figure.
- C. Figure 3 shows the approximate location of the UST that was unearthed in the southern courtyard during redevelopment activities. The DNR understands that there may have been another UST unearthed in the central courtyard. Clarify the location, amount and type of USTs that were unearthed during current redevelopment activities and display the locations of these USTs on Figure 3. Provide any tank system site assessment (TSSA) reports/data that may have been collected and discuss whether any contamination associated with these USTs has been discovered.

#### V. Other

##### A. Historic Fill Exemption

- i. Based on the presence and degree of solid waste materials (i.e., foundry sand, asphalt, brick and cinders) identified within the boring logs for the site, a "historic fill exemption", per Wis. Admin. Code § NR 506.085, is required for excavation/removal of the site cover and/or buried waste materials.

Please be aware that the SI can be an iterative process and that data results may indicate further assessment is needed to define the degree and extent of contamination.

#### Next Steps

In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- I. Per Wis. Admin. Code § NR 716.14, submit all sampling results (on appropriately formatted tables) within 10 days of receiving laboratory data.

- II. Per Wis. Admin. Code § NR 716.09, submit an SI work plan within 60 days of the date of this letter in response to the comments provided in this letter. Submit the applicable review fee if you would like to request DNR review of and response to the SI work plan.
- III. Per Wis. Admin. Code § NR 716.15(1), submit a revised SIR within 60 days after completing the additional SI activities related to the above comments. The revised SIR should be comprehensive, incorporating all data and providing updated evaluations of the data. Submit the applicable review fee if you would like to request DNR review of and response to the revised (comprehensive) SIR.
- IV. Per Wis. Admin. Code § NR 724.11, submit a commissioning plan for the vapor mitigation/extraction system that includes an indoor air sampling plan to demonstrate that VALs are not exceeded in the indoor air, per Wis. Admin. Code § NR 726.05(4). You may reference DNR guidance document RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, for commissioning guidelines. Submit the applicable review fee if you would like to request DNR review of and response to the commissioning plan.

The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me 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

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