State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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May 15, 2020

Mr. Mark Mittag
Milwaukee Metropolitan Sewerage District
260 West Seeboth Street
Milwaukee, WI 53204

SUBJECT: Approval of *Site Investigation Report*,
Former City of Milwaukee Warehouse Property
1028 North Hawley Road, Milwaukee, WI 53208
WDNR BRRTS Activity #: 02-41-583387
FID #: 241720710

Dear Mr. Mittag:

On January 10, 2020, the Wisconsin Department of Natural Resources (DNR) received a *Site Investigation Report* (SIR) prepared by Stantec Consulting Services, Inc. (Stantec) on behalf of Milwaukee Metropolitan Sewerage District (MMSD) for the former City of Milwaukee Warehouse property located at 1028 North Hawley Road, Milwaukee (property). Additional information associated with the site investigation was submitted to the DNR in April of 2020 by Stantec. The SIR indicates that soil and groundwater contaminated with Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs) and metals is present at the property. A fee was paid to the DNR to review the submittal for compliance with applicable Wis. Admin. Code ch. NR 700 and provide a written response on the adequacy of the site investigation and remedial action plan.

Site Summary

The property is approximately 2 acres in area and was formerly used as a bulk petroleum storage and warehouse facility. Fill material is present in the subsurface across the property. The Menomonee River flows adjacent to the south side of the property and the surrounding properties are industrial and commercial use. The removal of storage tanks and site structures was previously completed, and the property is currently vacant. Petroleum impacts to the property associated with the bulk storage facility were investigated in the 1990s following storage tank removal, and the investigation closed in 2009 by the DNR (BRRTS # 03-41-004133) with residual petroleum impacts in groundwater noted. MMSD plans to construct a soil levee on this property as part of a river flood control project. Following site investigation and levee construction, remaining soil impacts above Residual Contaminant Levels (RCLs) are planned to be capped with imported soil and monitoring of residual impacts in groundwater performed.

Site Investigation Review

A review of the above submittals was conducted for compliance with Wis. Admin. Code § NR 716. Specifically, the adequacy of vertical and areal delineation of contaminant impacts and the remaining issues stated in the DNR request of February 26, 2020. The DNR has determined that these issues have been adequately addressed and that soil and groundwater impacts on-site have been delineated

for site investigation purposes to the extent practicable. Additional site investigation is not needed at this time for identified receptors. A site-specific soil cleanup standard comparable to industrial RCLs has been applied to this property.

Review of Planned Remedial Actions

The planned property development activities appear to meet the requirements of a remedial action plan for residual impacts above state standards at this property. The planned activities include the placement of a soil cap across the entire property following levee construction activities. The use of a site-specific soil cleanup goal contingent upon the use of natural and constructed barriers limiting access to the property along with future continuing obligations placed upon the property and inclusion of the site on the DNR database will be part of the remedy. Replacement monitoring wells will be installed following construction activities and a groundwater monitoring program initiated, to determine the effectiveness of natural attenuation as a remedy for residual impacts in groundwater. If groundwater quality data from the monitoring program indicate vertical plume migration, piezometer well installation in bedrock may be warranted. A Materials Management Plan and NR 718 Exemption request will be submitted to the DNR prior to the initiation of redevelopment activities.

From submitted information it appears the requirements are satisfied; therefore, the remedial actions planned for the property are approved. Please keep in mind that a Wis. Admin. Code § NR 724.15(1) compliant remedial action documentation report must be submitted following completion of remedial activities described for the property.

We appreciate your efforts to restore the environment at this site. If you have any questions concerning the site or this letter, please contact me at (414) 263-8369, or at adam.mcilheran@wisconsin.gov.

Sincerely,

Adam S. McIlheran
Hydrogeologist
Remediation and Redevelopment Program

cc: Stu Gross, Stantec Consulting Services Inc. (electronic copy)
Linda Fellenz, LF Green Development, LLC (electronic copy)
SER file