GILES
ENGINEERING ASSOCIATES, INC.
GEOTECHNICAL, ENVIRONMENTAL & CONSTRUCTION MATERIALS CONSULTANTS

• Dallas, TX
• Los Angeles, CA
• Manassas, VA
• Milwaukee, WI

September 12, 2022

Wisconsin Department of Natural Resources
Remediation and Redevelopment Department
1027 W. St. Paul Avenue
Milwaukee, WI 53233

Attention: Mr. Paul Grittner
Project Manager

Subject: Emerging Contaminants Statement
333 North Water Street
Milwaukee, Wisconsin
BRRTS #02-41-589921
Giles Project No. 1E-2108005

Dear Mr. Grittner:

According to Giles' August 2021 Phase I Environmental Site Assessment (ESA), historically, several multi-story buildings were present on the Site from at least 1890 until the late 1960s. Review of City Directories by Giles indicated that building uses included drug sales or manufacturing, candy manufacturing, wholesale houses for dry goods, groceries, and stationery, warehousing space, a tavern, and a marine freight house. Based on the ALTA Survey notes, the former east bank of the Milwaukee River was located between 30 and 40 feet west of the current sheet pile wall, and according to historic fire insurance maps reviewed as part of Giles' ESA, this area was filled prior to 1890.

The former businesses that occupied the Site are not associated with the manufacturing, storage, handling, or disposal of the emerging contaminants perfluoroalkyl and polyfluoroalkyl substances (PFAS). PFAS are typically associated with manufacture of cookware finishes, fire-fighting foam, and dry-cleaning facilities that applied water repellent and stain guard treatments. None of these businesses have been documented at the Site.

The emerging contaminant 1,4-dioxane is not considered to be a contaminant of concern at this Site. The presence of 1,4-dioxane is linked to the presence of 1,1,1-trichloroethane (TCA) because of its widespread use as a stabilizer for certain chlorinated solvents[1,2]. Although chlorinated volatile organic compounds (CVOCs) associated with solvents were detected in the soil, the concentrations of trichloroethene (TCE) detected were minimal. TCE was detected in two soil samples (SB-1 and MW-3) collected from the fill soils at concentrations above Ch. NR 720 residual contaminant levels (RCLs) for groundwater protection and direct contact at non-industrial sites. Based on these results, it has been demonstrated that TCE is not present in significant quantities at the Site, therefore 1,4-dioxane is not expected to be present. Additionally, the TCE-impacted fill soil will be excavated from the Site.

[1] *EPA Technical Fact Sheet – 1,4-Dioxane*, dated November 2017
[2] https://www.health.state.mn.us/communities/environment/risk/docs/guidance/dwec/dioxaneinfo.pdf

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Please contact the undersigned with any questions or to request additional information.

Sincerely,

GILES ENGINEERING ASSOCIATES, INC.

Michelle L. Peed, P.G.
Project Manager

Kevin T. Bugel, P.G., C.P.G.
Environmental Division Manager