**State of Wisconsin**
**DEPARTMENT OF NATURAL RESOURCES**
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**Milwaukee WI 53233**

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March 3, 2023

Mr. James Wiechmann
New Land Enterprises
1840 N. Farwell Ave., Suite A
Milwaukee, WI 53202
*Email only to jim@pointbeer.com*

SUBJECT: Review of Site Investigation Report and Material Management Plan
Prange Greenhouses Former (Former GD Properties LLC), Lots 1 through 4
2510, 2520, 2525 and 2555 W. Good Hope Rd., Glendale, WI
BRRTS #02-41-562331 for Lot 1, 02-41-576953 for Lot 2, 02-41-576954 for Lot 3, 02-41-576955 for Lot 4, FID #341247060

Dear Mr. Wiechmann:

On September 3, 2019, the Wisconsin Department of Natural Resources (DNR) received the *Supplemental Site Investigation Report and Conceptual Remedial Action Plan* (Report), dated August 28, 2019, submitted on your behalf by Giles Engineering Associates, Inc. (Giles) for the four sites referenced above. In the Report, Giles summarized the environmental work conducted to date and concluded that no additional soil or groundwater characterization is required. Giles recommended that upon completion of remediation activities that would include soil removal and relocation on site and placement of barrier materials to address the risk for direct contact with contaminated material during property redevelopment, a subsequent report would be provided documenting the soil removal and barrier placement activities. It was anticipated that the planned activities would be sufficient for requesting closure of all four sites.

As part of the DNR's review of the Report, there have been multiple requests for additional information from Giles. In response, Giles has provided additional soil data, a proposal for groundwater sampling in a location with higher contaminant concentrations, and status updates indicating that overall redevelopment plans have changed. Additional sampling activities were conducted in response to the DNR's review of the Materials Management Plan (MMP) dated August 28, 2019, that Giles submitted on your behalf with the Report. The MMP has been reviewed concurrently with the Report. As with the conceptual remedial action plan, soil movement and relocation plans are contingent upon redevelopment plans. In the Wis. Admin. Code § NR 700.11 semi-annual status report submitted on January 13, 2023 to the DNR, Giles reported that the MMP is being revised to incorporate a new development plan for these properties.

Due to the long period of time that has passed since receipt of the Report and MMP in 2019, and the additional field work conducted in 2019, 2020 and 2021 that must be considered as part as the overall investigation summary, remedial action, and material management plans, the DNR has determined that the site investigation cannot be considered complete at this time. Giles stated in NR 700.11 semi-annual reports submitted in July 2022 and January 2023 that new development plans are pending for these sites, which will affect remediation and soil management plans. Therefore, a Site Investigation Report (SIR) Addendum and a new MMP should be submitted when the redevelopment plan is finalized.


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**Updated Site Names**

These four sites were previously identified in the DNR's BRRTS database as "GD Properties LLC Lot 1" through "GD Properties LLC Lot 4," which identified the property owner at the time the discharges were reported in 2014. Considering that GD Properties, LLC is no longer the property owner, these four sites are being renamed as "Prange Greenhouses Former Lot 1" through "Prange Greenhouses Former Lot 4," which reflects the name for the overall Facility Identification (FID) number for these properties and is indicative of the source of the contamination at these sites. Use these names on documents submitted for these sites in the future, along with each Lot number, BRRTS number and FID number.

**Background**

These four sites are currently separate properties that are being investigated concurrently. A separate investigation was also conducted on Lot 1 in 2016, when redevelopment was planned for only that property. At that time, the four parcels were assigned individual BRRTS activity numbers to accommodate separate redevelopment plans. More recently, the four properties were planned to be combined into one 5.42-acre property for redevelopment. As of the date of this letter, these sites are still identified as separate properties on the Milwaukee County GIS and Land Information website.

Giles attributes the polycyclic aromatic hydrocarbons (PAHs), lead, and arsenic contamination detected across these properties to historical uses as an orchard and nursery. In 2013 and 2014, soil samples were analyzed for volatile organic compounds (VOCs) in former petroleum storage tank areas, but were not detected. In 2014, five shallow soil samples were collected from the former orchard, suspected pesticide and herbicide mixing area, and one background location, and were analyzed for base neutral pesticides and acid herbicides, with none detected.

As part of the MMP review on August 5, 2020, the DNR recommended that contaminated soil in the boring B-11 location be considered for removal and disposal at a landfill rather than excavation and replacement onsite during redevelopment, as the PAH contamination in this area is much higher than anywhere else on the four sites and may be associated with burn activities in this area. An update on activities conducted to address the higher contaminant concentrations in this area is needed for considering the completeness of the investigation and for soil management.

**Next Steps**

The DNR requests that an SIR Addendum be submitted within 60 days of completing the additional site investigation activities at each of the four sites, per Wis. Admin. Code § NR 716.15(1). The DNR requests that the SIR Addendum be submitted with a fee for technical review and response. If the revised MMP is submitted at the same time as the SIR Addendum, only one review fee is needed for review of both reports for each site.

Since these four properties have not yet been combined and each are separate discharge sites, going forward a separate site investigation report and a separate review fee will be required for each site. Otherwise, provide documentation that these properties have been combined into one parcel so that these properties can be consolidated within the DNR database. The new certified survey map and address(es) should be provided when available.

In the DNR letter dated August 17, 2020, New Land Enterprises was informed of the requirement to assess emerging contaminants and their potential impacts at these sites as soon as possible in the cleanup process. An evaluation for the potential that per- and polyfluoroalkyl substances (PFAS), 1,4-dioxane and other contaminants

were historically produced, used, handled, or stored at these sites must be provided before the investigation at each of these sites can be considered complete.

The DNR appreciates your efforts to protect Wisconsin's environment. If you have any questions, please contact me, the DNR Project Manager, at linda.michalets@wisconsin.gov or at 414-435-8010.

Sincerely,

Linda Michalets
Hydrogeologist
Remediation and Redevelopment Program

cc: Kevin Bugel, Giles Engineering Associates, Inc. (kbugel@gilesengr.com)