State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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Tony Evers, Governor

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WISCONSIN
DEPT. OF NATURAL RESOURCES

April 1, 2025

Malibu Apartments, LLC
Attn: Jake Buswell
1310 W Wisconsin Ave
Sparta, WI 54656-2236
Sent via electronic mail only to Jake.Buswell@allamericandoitcenter.com

SUBJECT: Response to Site Investigation Report – Additional Investigation/Documentation Needed
Former Optenberg Facility, 1435 South Seventh Street, City of Sheboygan, WI 53081
DNR BRRTS #: 02-60-544558 & 06-60-544036, FID #: 460024290

Dear Mr. Buswell,

On February 25, 2025, the Wisconsin Department of Natural Resources (DNR) received a Supplemental Site Investigation Report for the above-referenced site, dated February 25, 2025, and submitted by your consultant, Jeff Brand of Stantec Consulting Services, Inc. (Stantec), on your behalf using U.S. EPA Brownfield Community-Wide Grant funds awarded to Sheboygan County. Based on review of your submittal, DNR has determined that additional investigation and documentation is needed.

Wisconsin Administrative (Wis. Admin.) Code § NR 716.11(3)(a) states that, "The purpose of a field investigation shall be to: Determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media." Additional investigation and documentation are needed to fully define the degree and extent of volatile organic compounds (VOCs) contamination at your site. Specifically, the following deficiencies were noted during review of your submittal:

- Soil:
  - Additional soil sampling is needed to further delineate the off-site petroleum volatile organic compound (PVOC) and chlorinated volatile organic compound (CVOC) soil impacts near the southeast corner of the site.
    - DNR recommends multiple soil borings be installed to complete definition with VOC analysis.
  - Additional soil sampling is needed to define the degree and extent of PVOC contamination to the south of SB-33.
  - DNR recommends resampling in the area of GP-13 at a similar depth to confirm presence of PCE in soil near the 1407 South 7th Street property.
    - If resampling does not occur, or CVOC contamination is confirmed to be present at this location, then the off-site residential property may require assessment for vapor intrusion.
- Groundwater:
  - Revise the groundwater isoconcentration map to show Resource Conservation and Recovery Act (RCRA) metals could be found above the preventive action level (PAL) in groundwater sitewide.
  - Additional 1,4-dioxane and mercury sampling in groundwater is not necessary at this time.
- Vapor Intrusion:
  - Once degree and extent of VOC contamination is defined in soil and groundwater, provide updated assessments for vapor intrusion for future on-site buildings, off-site buildings, and utilities.

        - Reference CVOC and PVOC contamination screening criteria provided in DNR's Guidance Document *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, RR-800.
    - There is indication that CVOCs were likely disposed down the sanitary drains during historic operations; DNR is requesting assessment of the potential for the sanitary sewer main to act as a preferential pathway for CVOC vapors to travel.
        - Reference DNR's *Guidance for Documenting the Investigation of Human-made Preferential Pathways Including Utility Corridors*, RR-649, for assessment and sampling protocol.
        - DNR has noted that two sanitary laterals servicing the property were included in historic site maps: one entering the property from 7th Street on the west side of the property to service the former northern building and one entering the property from Clara Avenue from the south servicing the former southern building. These should both be included in the assessment.
- Ordinary High-Water Mark (OHWM):
    - The Remediation and Redevelopment Program recommends continuing to work with Water Regulation and Zoning Specialist Francesca Sanchez to review the OHWM determination.
        - Please reach out to Francesca by phone at (414) 531-0305 or via email at Francesca.Sanchez@wisconsin.gov for assistance or submit your request here: Waterway Jurisdiction Determinations | | Wisconsin DNR.
- Historic Fill:
    - DNR concurs with the provided justification for not needing a historic fill approval request.
- Utilities:
    - Include all utility locations, including laterals, on a site plan map at a minimum. Utility locations were provided on historic maps in the site file.

Be aware that during your investigation, you are required to comply with Wis. Admin. Code chs. NR 700-754 and all other applicable statutes and administrative rules, including those pertaining to solid and hazardous waste management and/or wastewater discharges. Wis. Admin. Code ch. NR 716 details specific requirements for site investigations and for interpretation and presentation of your findings.

In addition, please keep in mind that depending upon the results of your additional investigation, it may be necessary for additional sampling.

The DNR appreciates your efforts to investigate and remediate this property. If you have any questions or concerns, please feel free to contact me at (920) 510-9482 or via email at ColinR.Schmenk@wisconsin.gov.

Sincerely,

Colin Schmenk

Colin Schmenk
Hydrogeologist – Northeast Region
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Jeff Brand, Stantec (Jeff.Brand@stantec.com)
Stu Gross, Stantec (Stu.Gross@stantec.com)
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