K P R G

ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.

TECHNICAL RESPONSE LETTER

April 25, 2025

Mr. Andy Alles
Wisconsin Department of Natural Resources
101 South Webster Street
Madison, WI 53703

VIA Email KPRG Project 14417

Re: Response Letter to WDNR Additional Site Investigation Report Review Letter
1515 N. 10th Street, Milwaukee, WI
BRRTS# 03-41-579223

Dear Mr. Alles:

On October 1, 2024, the Wisconsin Department of Natural Resources (WDNR) issued a letter to MillerCoors, LLC which provided review comments to the Site Investigation and Site Investigation Addendum Reports prepared by KPRG and Associates, Inc. (KPRG) dated December 12, 2017 and January 23, 2024, respectively. This Technical Response Letter is intended to be an Addendum to both reports specifically addressing WDNR comments provided in the above referenced letter.

WDNR Comment 1. A vapor risk screening assessment is required to support a determination of whether vapor investigation is needed for this site.

Response: Table 1-1 summarizes the screening criteria for petroleum Volatile Organic Compounds (PVOCs) as stated in the WDNR Guidance Document RR-800 *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin* (WDNR, 2018).

Table 1-1: Screening for Petroleum Vapors

Screening Criteria	BRRTS# 03-41-579223
1. Building has less than 15-feet vertical separation or 30-feet horizontal separation from NAPL.	**Not Present** – The Packaging and Warehouse Building (Facility) has less than 15- feet vertical separation and less than 30-feet horizontal separation from the former Underground Storage Tank (UST) location at the northeast corner of the property, however site specific conditions are

	being used for this evaluation based on the following technical data: (a) no free-phase product has been identified within 15 feet vertically or within 30 feet horizontally during the construction of the Facility; (b) aerated soil conditions existed prior to and during the construction of the Facility; and, (c) aerated soil conditions continue post-construction under the Facility via passive ventilation and barrier system and associated design elements.
2. Building has less than 5-feet of vertical separation from groundwater with benzene > 1 mg/L.	**Not Present** – With the review of the Site Investigation Report Addendum Water Level Elevation Table (Table 1), the water table beneath the Facility is observed to be approximately 10 to 13 feet below ground surface (bgs). Therefore, the Facility has greater than 5-foot vertical separation from groundwater with benzene concentrations above the screening criteria (1.0 mg/L).
3. Groundwater with concentrations above Wisconsin Administrative Code (WAC) § NR 140 Preventative Action Limit (PAL) has entered the building or is in contact with the building's foundation.	**Not Present** – With the review of the Site Investigation Report Addendum (KPRG, 2024) Water Level Elevation Table (Table 1), the water table beneath the Facility is observed to be approximately 10 to 13 feet bgs. Therefore, WAC § NR 140 PAL exceedances have not entered the Facility and are not in contact with the foundation of the Facility.
4. Building has less than 5-foot (vertical and horizontal) separation distance from petroleum contaminated soil with the potential for off-gassing.	**Not Present** – With the review of the Site Investigation Report (KPRG, 2017) Soil Sample Results (Table 3), there are no observed detections for PVOCs above generic RCLs vertically within 5-feet of the Facility with the potential for off-gassing. Although the Facility does not have 5-feet of separation horizontally from the former UST location, these borings were conducted in 2017 and it is likely the low concentrations would have already degraded further below the generic RCLs. Additional details are provided below.

5. Petroleum vapors are present in utilities that transect a petroleum source area.	**Not Present** – With the review of the Site Investigation Report (KPRG, 2017) Soil Sample Results (Table 3) and the Site Investigation Report Addendum (KPRG, 2024) Groundwater Sampling Analytical Results (Table 2), there are no observed detections for PVOCs above generic RCLs and WAC § NR 140 Standards present in areas that utilities transect.
6. Petroleum odors are present in building near petroleum source area.	**Not Present** – There are no petroleum odors documented within the Facility area.

As summarized in the above Table 1-1, vapor intrusion from PVOCs is unlikely based on the existing data provided in the Site Investigation Report (KPRG, 2017) and the Site Investigation Report Addendum (KPRG, 2024). While it remains unlikely that PVOCs continue to present a vapor risk after years of natural attenuation, in the abundance of caution, this was further considered prior to construction of the Facility. The Facility was constructed with the slab on-grade and there is a vertical separation of greater than 5 feet across the footprint of the foundation. Furthermore, the Facility includes a 20-mil thickness vapor intrusion barrier and a passive ventilation and barrier system, which further limit any potential vapors from entering the structure.

Based on this VI assessment, KPRG concludes that vapor intrusion into the Facility is not a concern at the Site.

WDNR Comment 2. An emerging contaminant scoping statement is required, including a discussion of the potential for PFAs contaminants at this site.

Response: The focus of the Site Investigation Report (KPRG, 2017) and the Site Investigation Report Addendum (KPRG, 2024) was the UST discovered during demolition prior to property redevelopment. PFAS sampling is not necessary at the Facility because it is well documented that the contaminants of concern are PVOCs. Presently, the Facility is best defined as Packaging and Storage operations under the Land Use Control (LUC) description Manufacturing. With review of site history, previous LUC descriptions include but are not limited to Special Mercantile with the operations of Jaeger Bakery and Metz Baking Company.

The WDNR and United States Environmental Protection Agency (USEPA) have identified the presence of PFAS in both surface water and sediment in the Menomonee and Milwaukee Rivers. Approximately 90% of the watershed that drains into the Menomonee and Milwaukee rivers is considered urbanized and the Facility is located within this urbanized area of the City of Milwaukee. As a result, many potential sources of PFAS exist around the Facility and any PFAS identified through sampling could not potentially be linked to the past and present operations.

Based on this PFAS assessment, KPRG concludes that the potential for PFAs contaminants at this site could not be linked to past and present site operations.

WDNR Comment 3. The report provides a brief discussion of the "pathway to closure", which does not address the closure requirements for groundwater contamination. A discussion of how the groundwater investigation results support case closure requirements under Wis. Admin. Code § NR 726.05 should be provided at this time.

Response: Groundwater sampling analytical results for the Facility show that observed concentrations of PVOCs are all below their respective Enforcement Standards (ES's) with the exception of the following:

- Benzene at MW-1, TW-1, and TW-3;
- Naphthalene at MW-1 and TW-1;
- 1,2,4 and 1,3,5-Trimethylbenzene combined at MW-1 and TW-1; and,
- Total Xylenes at MW-1.

Groundwater sampling analytical results for the Facility show that observed concentrations of PVOCs are all below their respective Preventive Action Limits (PAL's) with the exception of the following:

- Benzene at MW-1, MW-2, MW-5, TW-1, and TW-3;
- Ethylbenzene at TW-1;
- Naphthalene at MW-1, MW-4, TW-1, and TW-3;
- 1,2,4 and 1,3,5-Trimethylbenzene combined at MW-1, MW-4, TW-1, and TW-3; and,
- Total Xylenes at MW-1 and TW-1.

Based on these WAC § NR 140 Standard exceedances, it is observed that they are limited to the former UST cavity and the adjacent area. PAL and ES exceedances are both not present outside of the former UST cavity area and not present at the property boundary in the perimeter monitoring wells MW-7, MW-8, and MW-9.

Therefore, case closure should be granted for the PVOCs impacts as concluded by the Site Investigation Report (KPRG, 2017) and subsequent application for Case Closure. Specifically, residual groundwater impacts that exceed the ES for various PVOCs are present nearest the former UST excavation cavity as noted in the results for monitoring well MW-1. These noted impacts do not extend past the property boundary.

WDNR Comment 4. To illustrate and support the interpretation of the extent and degree of contamination, add the following features to the cross section;

> **WDNR Item a.** Isoconcentration contour lines indicating the extent of soil contamination above NR 720 RCLs and groundwater contamination above preventive action limits.

Response: See attached Figures 4-2 and 4-3.

WDNR Item b. Location of soil and groundwater samples and relevant results to support the isoconcentration lines. Include the excavation soil samples.

Response: See attached Figures 4-2 and 4-3.

WDNR Item c. Well screen locations for the monitoring wells (including temporary monitoring wells).

Response: See attached Figure 4-1.

WDNR Item d. Location of the water table.

Response: See attached Figures 4-1, 4-2 and 4-3.

WDNR Items e. The DNR recommends extending the cross-section laterally as needed to ensure the estimated extent of groundwater contamination is within the cross-section (i.e. to the recent monitoring well locations).

Response: See attached Figures 4-1, 4-2 and 4-3.

WDNR Comment 5. Table 1 Soil Sample Results from UST Excavation needs to include the depth of the soil samples taken within the excavation. This will provide information on the location and extent of soil contamination.

Response: See attached revised Table 1.

WDNR Comment 6. Table 1 and Table 3 (Soil Sample Results) should include the nonindustrial direct contact residual contaminant levels, even if the property has industrial use and zoning.

Response: See attached revised Tables 1 and 3.

WDNR Comment 7. The figure titled "Aerial Extent of Soil Impacts" should be revised to include isoconcentration lines for relevant contaminants, the excavation soil samples and their depths, and non-detect soil data to support the soil contamination isoconcentration line placement.

Response: See attached revised Figure 6.

If there are any questions, please contact us at 262-781-0475 or Joan Giuliani of Molson Coors LLC, USA at 414-931-2470.

Sincerely,
KPRG and Associates, Inc.

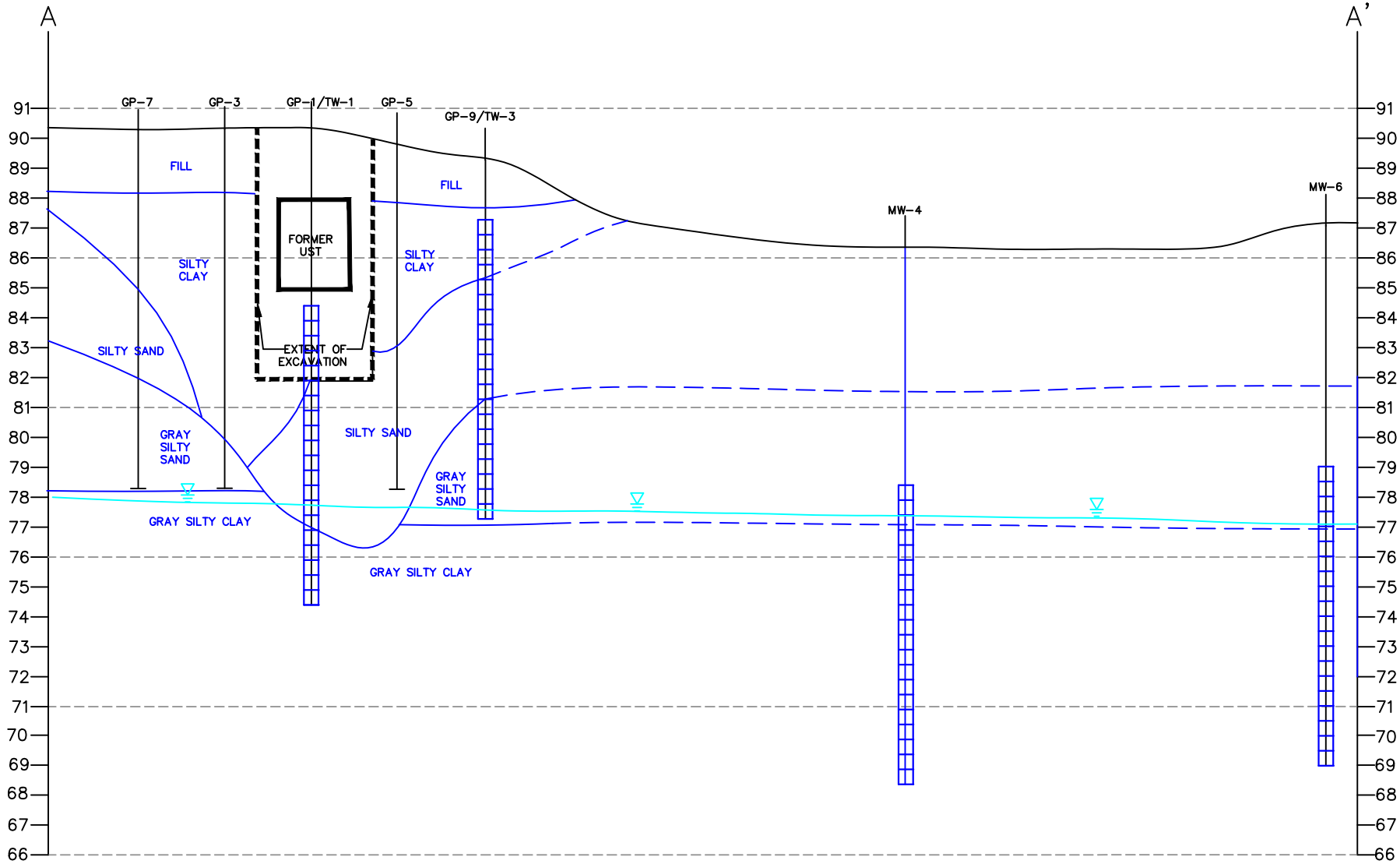
Kieth E Nielsen
Project Geologist

Patrick Allenstein, P.G.
Senior Geologist

cc: Joan Giuliani, Molson Coors, LLC

Attachments

ATTACHMENTS



5'

0

35'

APPROXIMATE SCALE

ENVIRONMENTAL CONSULTATION & REMEDIATION

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414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

GEOLOGIC CROSS-SECTION A-A'

1515 N. 10th STREET/918 W. SOMERS STREET
MILWAUKEE, WISCONSIN

Scale: 1" = 35'

Date: March 17, 2025

KPRG Project No. 14417

FIGURE 4-1

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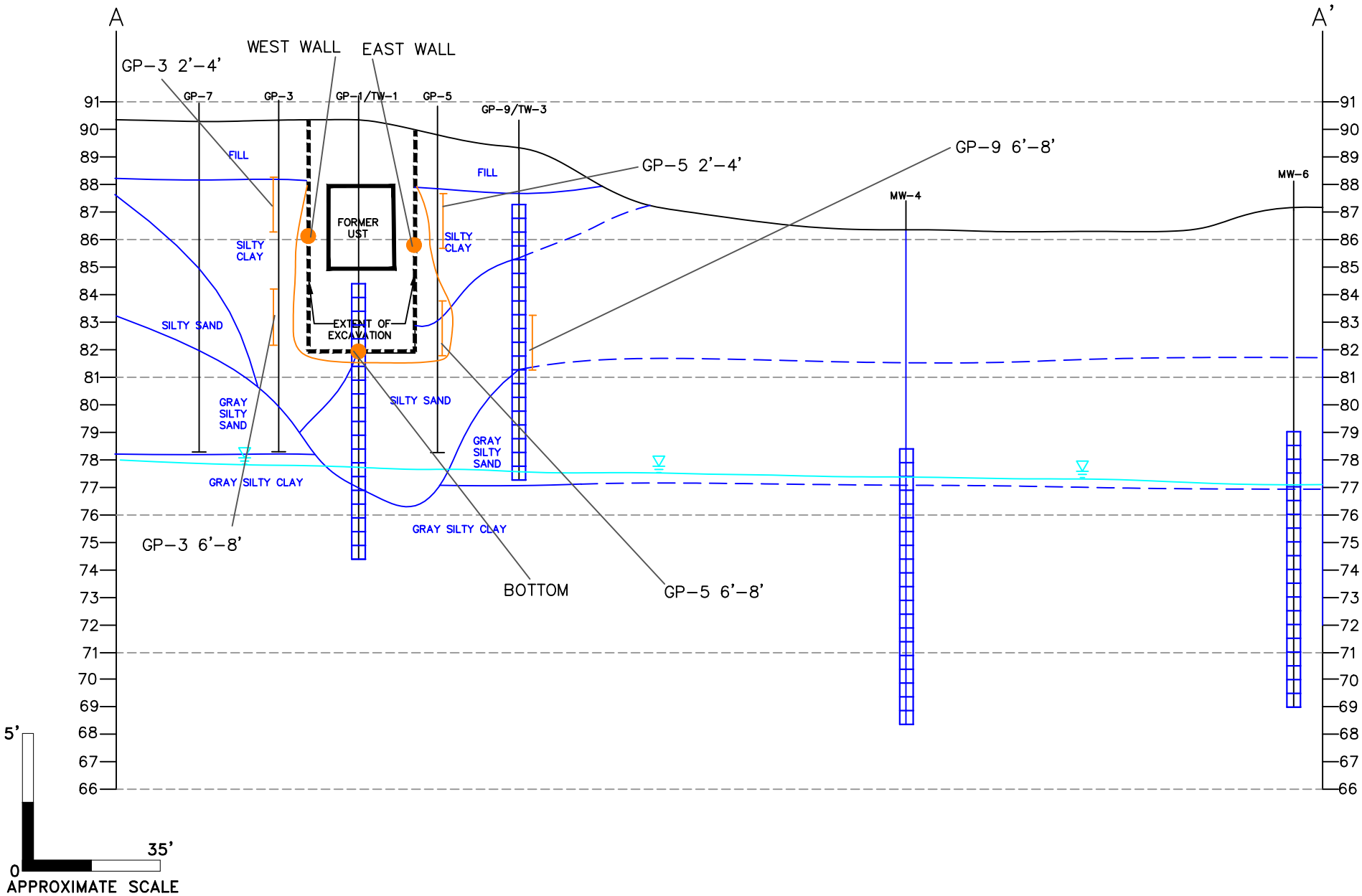

5'

0

35'

APPROXIMATE SCALE

LEGEND

EXTENT OF PVOC SOIL-GW IMPACTS

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CROSS-SECTION A-A' EXTENT OF SOIL IMPACTS

1515 N. 10th STREET/918 W. SOMERS STREET
MILWAUKEE, WISCONSIN

Scale: 1" = 35'

Date: March 17, 2025

KPRG Project No. 14417

FIGURE 4-2

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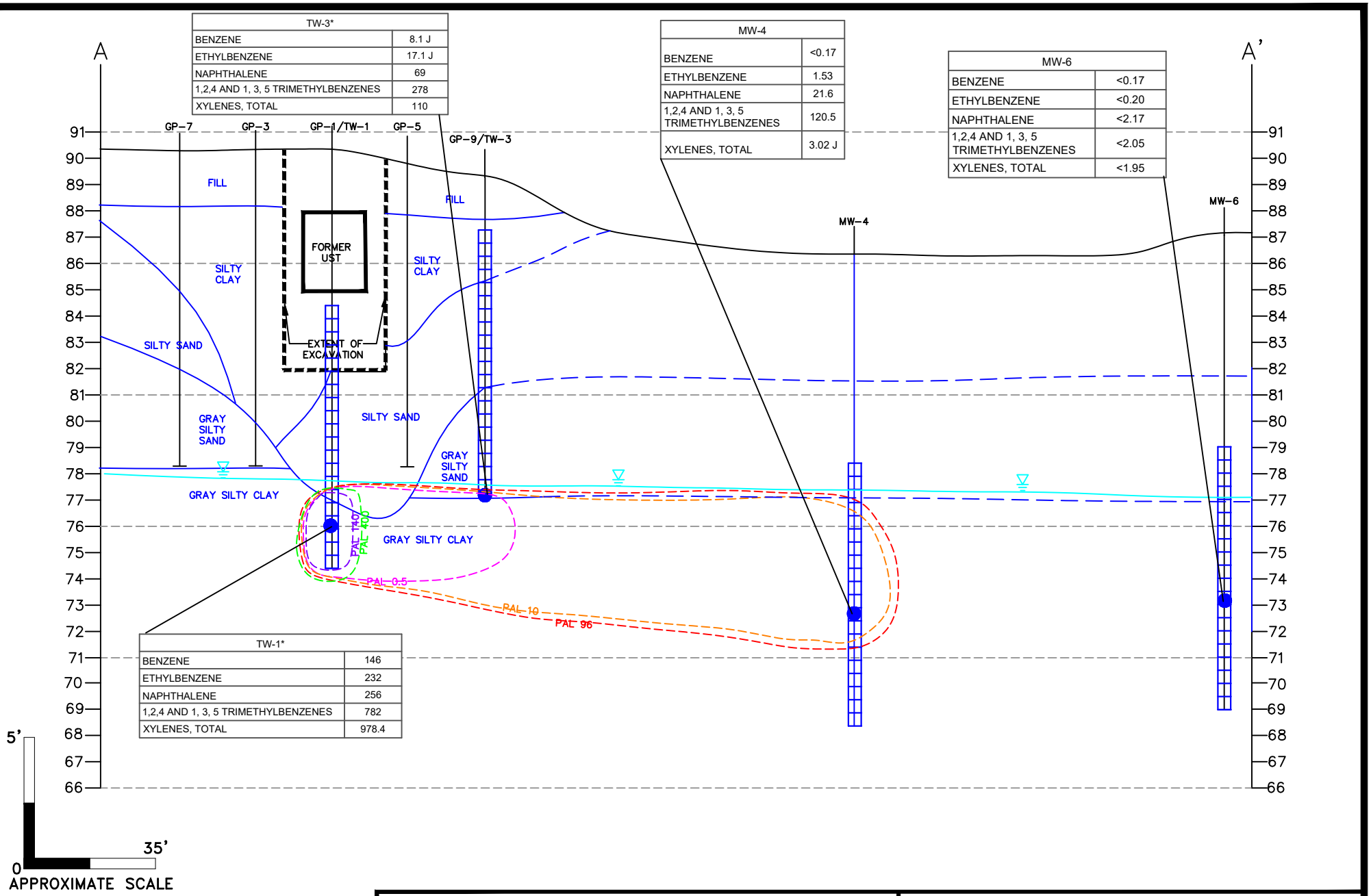

TW-3*	
BENZENE	8.1 J
ETHYLBENZENE	17.1 J
NAPHTHALENE	69
1,2,4 AND 1, 3, 5 TRIMETHYLBENZENES	278
XYLENES, TOTAL	110

MW-4	
BENZENE	<0.17
ETHYLBENZENE	1.53
NAPHTHALENE	21.6
1,2,4 AND 1, 3, 5 TRIMETHYLBENZENES	120.5
XYLENES, TOTAL	3.02 J

MW-6	
BENZENE	<0.17
ETHYLBENZENE	<0.20
NAPHTHALENE	<2.17
1,2,4 AND 1, 3, 5 TRIMETHYLBENZENES	<2.05
XYLENES, TOTAL	<1.95

TW-1*	
BENZENE	146
ETHYLBENZENE	232
NAPHTHALENE	256
1,2,4 AND 1, 3, 5 TRIMETHYLBENZENES	782
XYLENES, TOTAL	978.4

5'

0

35'

APPROXIMATE SCALE

LEGEND

BENZENE

ETHYLBENZENE

NAPHTHALENE

1,2,4 AND 1,3,5 TRIMETHYLBENZENES

XYLENES, TOTAL

PAL = Preventative Action Limit

*NOTE: SAMPLES TAKEN 5/31/17. ALL OTHER SAMPLES TAKEN 7/24/27.

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CROSS-SECTION A-A' EXTENT OF GROUNDWATER IMPACTS

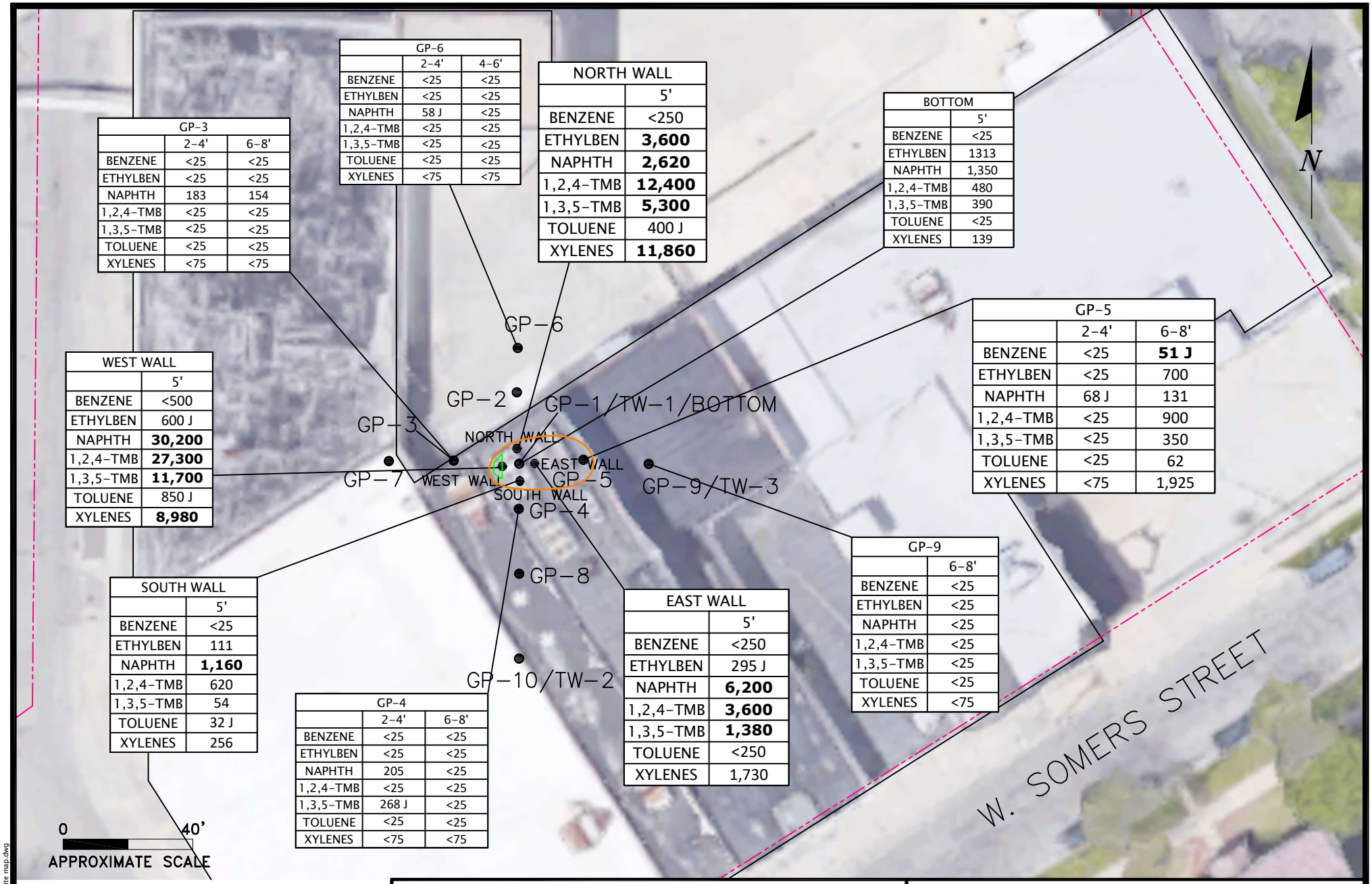
1515 N. 10th STREET/918 W. SOMERS STREET
MILWAUKEE, WISCONSIN

Scale: 1" = 35'

Date: March 17, 2025

KPRG Project No. 14417

FIGURE 4-3



GP-3	2-4'	6-8'
BENZENE	<25	<25
ETHYLBEN	<25	<25
NAPHTH	183	154
1,2,4-TMB	<25	<25
1,3,5-TMB	<25	<25
TOLUENE	<25	<25
XYLENES	<75	<75

GP-6	2-4'	4-6'
BENZENE	<25	<25
ETHYLBEN	<25	<25
NAPHTH	58 J	<25
1,2,4-TMB	<25	<25
1,3,5-TMB	<25	<25
TOLUENE	<25	<25
XYLENES	<75	<75

NORTH WALL	5'
BENZENE	<250
ETHYLBEN	**3,600**
NAPHTH	**2,620**
1,2,4-TMB	**12,400**
1,3,5-TMB	**5,300**
TOLUENE	400 J
XYLENES	**11,860**

BOTTOM	5'
BENZENE	<25
ETHYLBEN	1313
NAPHTH	1,350
1,2,4-TMB	480
1,3,5-TMB	390
TOLUENE	<25
XYLENES	139

WEST WALL	5'
BENZENE	<500
ETHYLBEN	600 J
NAPHTH	**30,200**
1,2,4-TMB	**27,300**
1,3,5-TMB	**11,700**
TOLUENE	850 J
XYLENES	**8,980**

GP-5	2-4'	6-8'
BENZENE	<25	**51 J**
ETHYLBEN	<25	700
NAPHTH	68 J	131
1,2,4-TMB	<25	900
1,3,5-TMB	<25	350
TOLUENE	<25	62
XYLENES	<75	1,925

SOUTH WALL	5'
BENZENE	<25
ETHYLBEN	111
NAPHTH	**1,160**
1,2,4-TMB	620
1,3,5-TMB	54
TOLUENE	32 J
XYLENES	256

GP-9	6-8'
BENZENE	<25
ETHYLBEN	<25
NAPHTH	<25
1,2,4-TMB	<25
1,3,5-TMB	<25
TOLUENE	<25
XYLENES	<75

EAST WALL	5'
BENZENE	<250
ETHYLBEN	295 J
NAPHTH	**6,200**
1,2,4-TMB	**3,600**
1,3,5-TMB	**1,380**
TOLUENE	<250
XYLENES	1,730

GP-4	2-4'	6-8'
BENZENE	<25	<25
ETHYLBEN	<25	<25
NAPHTH	205	<25
1,2,4-TMB	<25	<25
1,3,5-TMB	268 J	<25
TOLUENE	<25	<25
XYLENES	<75	<75

PVOC SOIL TO GROUNDWATER

NAPHTHALENE RCL

RCL = RESIDUAL CONTAMINANT LEVEL

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AREAL EXTENT OF SOIL IMPACTS

1515 N. 10th STREET/918 W. SOMERS STREET
MILWAUKEE, WISCONSIN

Scale: 1" = 60'

Date: October 10, 2017

KPRG Project No. 14417

FIGURE 6

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Table 1 - Soil Sample Results from UST Excavation -1515 N 10th Street, Milwaukee, WI

Sample Name	WDNR RCLs			North Wall	South Wall	East Wall	West Wall	Bottom
Sample Depth				5'	5'	5'	5'	8'
Parameter Date	Industrial	Non-Ind.	Soil-GW	03/20/17	03/20/17	03/20/17	03/20/17	03/20/17
Benzene	7,070	1,600	5.1	<250	<25.0	<250	<500	<25
Ethylbenzene	35,400	8,020	1,570	**3,600**	111	295 J	600 J	131
Methyl-tert-butyl ether	282,000	63,800	27	<250	<25.0	<250	<500	<25
Naphthalene	24,100	5,720	658.2	**2,620**	**1,160**	**6,200**	**<u>30,200</u>**	**1,350**
1,2,4-Trimethylbenzene	219,000	219,000	1382.1 *	**12,400**	620	**3,600**	**27,300**	480
1,3,5-Trimethylbenzene	182,000	182,000	1382.1*	**5,300**	54	**1,380**	**11,700**	390
Toluene	818,000	818,000	1,107.2	400 J	32 J	<250	850 J	<25.0
Xylene (Total)	260,000	260,000	3,960	**11,860**	256	1,730	**8,980**	139

Notes: All values in ug/kg.
RCL - Residual Contaminant Level
Soil-GW - Soil to Groundwater
Non-Ind. - Non-Industrial
* - RCL is for 124 and 135 combined

BOLD - Exceeds the Soil-GW RCL.
<u>BOLD</u> - Exceeds Direct Contact RCL
J - Estimated concentration above Limit of Detection but below Limit of Quantification

Table 3 - Soil Sample Results -1515 N 10th Street, Milwaukee, WI

Sample Name	WDNR Industrial			GP-3 2-4	GP-3 6-8	GP-4 2-4	GP-4 6-8	GP-5 2-4	GP-5 6-8	GP-6 2-4	GP-6 4-6	GP-9 6-8
Parameter Date	RCL	Non-Ind.	Soil-GW	05/24/17	05/24/17	05/24/17	05/24/17	05/24/17	05/24/17	05/24/17	05/24/17	05/24/17
Benzene	7,070	1,600	5.1	<25	<25	<25	<25	<25	**51 J**	<25	<25	<25
Ethylbenzene	35,400	8,020	1,570	<25	<25	<25	<25	<25	700	<25	<25	<25
Methyl-tert-butyl ether	282,000	63,800	27	<25	<25	<25	<25	<25	<25	<25	<25	<25
Naphthalene	24,100	5,720	658.2	183	154	205	<25	68 J	131	58 J	<25	<25
1,2,4-Trimethylbenzene	219,000	219,000	1382.1 *	<25	<25	<25	<25	<25	900	<25	<25	<25
1,3,5-Trimethylbenzene	182,000	182,000	1382.1*	<25	<25	268 J	<25	<25	350	<25	<25	<25
Toluene	818,000	818,000	1,107.2	<25	<25	<25	<25	<25	62	<25	<25	<25
Xylene (Total)	260,000	260,000	3,960	<75	<75	<75	<75	<75	1,925	<75	<75	<75

Notes: All values in ug/kg.
RCL - Residual Contaminant Level
Soil-GW - Soil to Groundwater
Non-Ind. - Non-Industrial
* - RCL is for 124 and 135 combined

BOLD - Exceeds the Soil-GW RCL.
BOLD - Exceeds Direct Contact RCL
J - Estimated concentration above Limit of Detection but below Limit of Quantification