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May 23, 2025

Mr. Brian Parro
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Mr. Michael Crosby
North American Development Group
360 S Rosemary Avenue, Suite 400
West Palm Beach, FL 33401
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Subject: Review of Site Investigation Work Plan
The Lydell Apartment Buildings – Landfill
5805, 5815, 5905 N. Lydell Ave. & 225 W. Bayside Dr., Glendale, Wisconsin
BRRTS #02-41-592293; FID #341209660

Dear Messrs. Parro and Crosby:

On April 8, 2025, the Wisconsin Department of Natural Resources (DNR) received a *NR 716 Supplemental Site Investigation Work Plan* (SIWP), submitted by GZA Geo Environmental, Inc. (GZA) for the property described above (Site). The DNR received a fee for providing a review and response, in accordance with Wis. Admin. Code § NR 749.04(1).

Proposed Work Plan Summary

Fill materials are present across the Site and are the source of polycyclic aromatic hydrocarbon (PAH), volatile organic compound (VOC) and Resource Conservation and Recovery Act (RCRA) metal contamination. The SIWP proposes the following scope of work to further delineate the trichloroethylene (TCE) impacts identified in groundwater, soil, and vapor collected during the August 2023 Site investigation activities.

Four additional soil borings will be advanced with up to two samples per boring to be collected. It is anticipated that approximately 10 soil samples will be collected for laboratory analysis.

The four borings will be converted to monitoring wells to facilitate collection of groundwater samples. The monitoring wells will be Wis. Admin. Code NR 141-variant monitoring wells, as the wells will be installed utilizing a hand cart due to the height clearance limitations within the parking garage. One round of groundwater samples will be collected and analyzed for VOCs.

Another round of sewer utility line testing will be conducted following approval from the utility owner of the City of Glendale from the western N. Lydell Avenue sidewalk sewer utility.

DNR Review

The DNR has reviewed the SIWP for compliance with Wis. Admin. Code §§ NR 716.07 and 716.09 and is unable to approve the proposed investigation at this time. Submit a new SIWP that addresses the following comments:

1. Groundwater contamination is currently presented to be across the southern-most portion of the Site to the property lines. Groundwater must be defined off-site to the east in accordance with Wis. Admin. Code § NR 716.11(4). Install wells on the east side of N. Lydell Avenue in the sidewalk right-of-way area.
2. Based on the concentration of chlorinated volatile organic compounds (CVOCs) in soil gas and groundwater, install a piezometer to determine vertical definition of the groundwater contamination.
3. The risk of vapor intrusion to the residences located east of N. Lydell Avenue cannot be fully ruled out based on existing data. Conduct additional sampling to assess the potential risk of vapor intrusion to the residences located east of N. Lydell Avenue. Additional sampling activities could include installing groundwater monitoring well(s), collecting soil gas samples and/or individual residential home indoor air/sub-slab vapor sampling.
4. The DNR agrees with the proposal to collect additional vapor samples from the sanitary sewer located on the western side of N. Lydell Avenue. Based on the existing results from the "Manhole-South" location, include additional sanitary sewer vapor sample(s) south of the "Manhole-South" location.
5. Vapor sampling in all three (Glendale, MMSD and Whitefish Bay) sewer lines is required. Previous sanitary sewer vapor samples were instantaneous grab samples analyzed by a field gas chromatograph electron capture device. Sampling of all three sewer lines utilizing passive samplers is warranted to ensure data is representative of potential temporal variation.
6. Based on the figures provided it appears there is a separate sanitary sewer line located south of Building 3, near GP-22, which extends onto the Target property. Collect vapor samples from this sanitary sewer line.
7. Based on the presence of CVOCs in vapor samples collected from p-traps inside Building 3, collect vapor samples from the sanitary cleanouts of Building 3.
8. Provide additional information regarding utilities near the Site including location, points of connection, elevation/depth, construction material, and show all connections from the buildings to the sewer lines on the figures.
9. Work with the lab to select an appropriate passive sample device for the sanitary sewer vapor samples.
10. Groundwater preventative action limit (PAL) exceedances are present in borings in N. Lydell Avenue that are not depicted in the contour lines.
11. Provide a cross section that shows the utilities within N. Lydell Avenue and which ones are proposed to be sampled.
12. The soil tables have the incorrect units listed. The tables note µg/kg, but the data is in mg/kg.
13. The signed certification statement did not use the correct language per Wis. Admin. Code § NR 712.09(3)(b).

Emerging Contaminants

The DNR concurs that based on the historic use of the property it is unlikely that emerging contaminants were discharged at the Site. Therefore, no sampling for emerging contaminants is needed at this time.

Next Steps

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Submit a revised site investigation workplan within 60 days, per Wis. Admin. Code § NR 716.09(1). Submit the plan with a fee for review and response.
- Site investigation activities must begin within 60 days of the approval of the workplan per Wis. Admin. Code § NR 716.11(2r).
- Sampling results must be reported to the DNR within 10 days of receiving the data per Wis. Admin. Code § NR 716.14(2).
- Submit a Site Investigation Report (SIR) within 60 days after completion of the field investigation and final receipt of laboratory data per Wis. Admin. Code § NR 716.15(1). Submit the SIR with a fee for review and response.
- Semi-annual progress reports are required until the case is closed per Wis. Admin. Code § NR 700.11.

A site investigation can be an iterative process. Site investigation activities may indicate that further investigation is needed to define the degree and extent of contamination. The DNR appreciates the efforts you are taking to address the contamination at this Site. If you have any questions about this letter, please contact me at (414) 639-4156 or david.hanson@wisconsin.gov.

Sincerely,

David Hanson
Redevelopment Specialist
Remediation & Redevelopment Program

cc: Heidi Woelfel, GZA (heidi.woelfel@gza.com)
James Drought, GZA (james.drought@gza.com)