State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 West St. Paul Avenue
Milwaukee WI 53233-2641

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

August 15, 2025

Brian Cass
OHM Holdings, Inc.
W229 N2494 County Road F
Waukesha, WI 53186
Via Email Only to: brian@ohmholdings.com

Thomas Harrigan
Village of Elm Grove
13600 Juneau Blvd.
Elm Grove, WI 53122
Via Email Only to: tharrigan@elmgrove.org

SUBJECT: Review of *Response to WDNR February 20, 2025 Technical Assistance Letter: Review of Site Investigation Report Addendum*
OHM Holdings – Elm Grove
13405 Watertown Plank Road, Elm Grove, Wisconsin
BRRTS #02-68-552102, FID #268104540

Dear Mr. Cass and Mr. Harrigan:

The Wisconsin Department of Natural Resources (DNR) received the above response letter (Submittal), prepared by EnviroForensics, LLC (EnviroForensics), dated April 17, 2025 for the site identified above on behalf of OHM Holdings – Elm Grove (OHM). The Submittal contained additional discussion regarding the completeness of the site investigation and remedial actions concerning chlorinated volatile organic compounds (CVOCs) contamination at the site. The DNR is providing comments on the site investigation and assessment as they relate to applicable Wis. Admin. Code (WAC) chs. NR 700 - NR 799.

Site Investigation Activities

Vapor Assessment: Additional vapor sampling is needed to complete the site investigation.

- Additional sampling is needed to determine the risk of vapor intrusion to the building located at 13404 Watertown Plank Road. The building is located within 100 feet of residual CVOC soil impacts. Soil gas sampling was conducted at SG-9 near the 13404 Watertown Plank Road building; however, SG-9 is side gradient from the soil and soil gas source area near B-27 and only one round of sampling was conducted. As the building was reported to have a basement, determine the location and depth of the sanitary sewer later to the building and if any features of the basement could be a potential vapor migration point.

- Additional sampling is needed to determine the risk of vapor intrusion to the building located at 13395 Watertown Plank Road. The building is located within 100 feet of residual CVOC soil impacts and there is currently no soil gas data to define the extent of impacts east of SS-3.

- Based on the soil gas results at SG-6, SG-7, and SG-8, additional sampling is needed to determine the risk of vapor intrusion to the building located at 13425 Watertown Plank Road. No soil gas data was collected southwest of these locations to determine extent.

- Based on the current data it appears application of the future vapor risk continuing obligation will be necessary at multiple off-site properties including, 13395 Watertown Plank Road and 13425 Watertown Plank Road, additional sampling would be necessary if you or the off-site owners would like to demonstrate the future vapor risk continuing obligation is not necessary.

Remedial Action Activities

Although previously approved interim actions have been completed (amendment injection for groundwater and SVE system operation for soil) contamination remains in soil at concentrations that require further evaluation in a Remedial Action Options Report (RAOR) and a revised Remedial Action Design Report (RADR). These documents should be developed and submitted to the DNR per Wis. Admin. Code chs. NR 700-799 as part of the pathway to site closure. The DNR has the following comments in developing the RAOR and RADR:

- Since contaminated soil disturbance and management activities are planned for the site as part of the Village of Elm Grove Underwood Creek daylighting project, any changes affecting the site remedial action options planning and design should be understood and incorporated in the remedial planning as necessary.

- The current asphalt and former building floor appear relatively competent as an infiltration barrier. There are areas with highly contaminated soil present onsite, such as at boring SB-8. Any change to the site surface, such as grading and/or removing or replacing the surface cover during site development with more permeable material, would necessitate determining if infiltration has increased or groundwater conditions affected to the point that the groundwater contaminant plume is expanding or contaminant concentrations are increasing. Groundwater sampling and monitoring post-development would be needed to accomplish this, with replacement monitoring wells installed if existing monitoring wells are abandoned for site redevelopment.

- Include a soil contamination extent figure that includes extent lines for PCE concentrations in soil above groundwater pathway residual contaminant levels (RCLs) and non-industrial direct contact RCLs. Inferred portions of the lines may be dashed. Include analytical data used to determine the extent and depths of samples to be clear which samples represent the direct contact zone, 0-4’ below ground surface. The contamination extent must be clear to determine if a design plan adequately addresses remaining environmental risk. Include a figure of the site showing both the contamination extent and planned creek and park excavation areas.

- Include revised cross-sections that include estimated extent lines for soil contamination above groundwater pathway RCLs, direct contact RCLs, and groundwater contamination above Wis. Admin. Code ch. NR 140 enforcement standards and preventive action limits. Include the planned areas of excavation for creek and park development in the cross-sections as appropriate.

Underwood Creek Daylighting Project

As discussed in previous meetings with DNR staff, the Village of Elm Grove must address the planned management of contaminated material identified on the remaining project corridor to the south as well as creek excavation work on the OHM site. This would include contaminant discharge notifications for each property, clarifications of responsible parties, completion of applicable Wis. Admin. Code chs. NR 700 - 799 activities and reporting relating to site investigation, interim action and/or final remedial design and material management in conjunction with the planned creek redevelopment activities.

Next Steps

- To meet case closure requirements related to the vapor pathway, OHM should complete the vapor assessment as described above. Submit a summary report with supporting documentation of the completed activities and a conclusion regarding completeness of the vapor investigation.

- OHM, with necessary collaboration from the Village of Elm Grove, should submit a revised RAOR and, as applicable, RADR for the OHM property, describing how remedial plans and proposed continuing obligations will meet case closure criteria. Materials management should be addressed and should include any applicable hazardous waste determinations.

- The Village of Elm Grove should proceed with discharge notification reporting for contamination south of the OHM property, development of a RADR reflective of the planned creek redevelopment activities and submittal of a plan for meeting applicable requirements relating to environmental investigation and remedial actions for this portion of the project corridor.

We appreciate your efforts to restore the environment at this site. The Village of Elm Grove has requested a meeting call regarding the status of the project. The DNR can coordinate a meeting with the Village and OHM representatives on the issues discussed above. If you have any questions concerning the site or this letter, please contact me at (414) 207-2179, or by email at adam.mcilheran@wisconsin.gov.

Sincerely,

Adam S. McIlheran
Hydrogeologist
Remediation and Redevelopment Program

cc: Rob Hoverman, EnviroForensics, LLC – rhoverman@enviroforensics.com
Nicolette Morris, EnviroForensics, LLC – nmorris@enviroforensics.com
Rich Klein, Stantec – richard.klein@stantec.com
Stu Gross, Stantec – stu.gross@stantec.com
Alison Masek, Wisconsin DNR, Waterways Program – alison.masek@wisconsin.gov