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WISCONSIN
DEPT. OF NATURAL RESOURCES

June 27, 2011

Ms. Karen Dettmer
Redevelopment Authority of the City of Milwaukee
809 N. Broadway
Milwaukee, WI 53202

Subject: Site investigation Report and Remedial Action Plan (SI/RAP) approval
1027 N. Edison St. site, 1027 N. Edison St., Milwaukee, WI
WDNR FID#341200530 BRRTS#02-41-556655

Dear Ms. Dettmer:

The Wisconsin Department of Natural Resources (Department) has received a request for review and approval of the May 2011 *Site Investigation Report and Remedial Action Plan* for the above-referenced property. The report, review request and review fee was submitted on behalf of the Redevelopment Authority of the City of Milwaukee (RACM) by Stephen Meer, Sigma.

Based on review of the SI/RAP, the Department understands this site to be an approximate ½ acre site on the east edge of the Milwaukee River in downtown Milwaukee. The site is bisected by an east-west trending pedestrian walkway, the northern portion grass-covered (assumed six inches of topsoil) and undevelopable due to the presence of existing easements. The southern parcel is paved with a concrete lot. The site is underlain by eight to twelve feet of historic fill material comprised of sandy silts, silty sands and various amounts of brick, wood and traces of glass and cinders. Methane gas was detected at the site. The Department recently approved RACM's application for a grant of exemption from the prohibitions contained in ch. NR 506.085, Wis. Adm. Code to allow building on a historic fill site.

Site investigation
Soil/historic fill: Laboratory analysis of subsurface materials identified elevated concentrations of polyaromatic hydrocarbons (PAHs), arsenic and lead. Sigma compared the reported concentrations of contaminants to non-industrial residual contaminant levels (RCLs) for soil based direct contact and protection of groundwater. Results indicate exceedances of RCLs based on direct contact collected at depths between zero to twelve feet below ground surface on the south portion of the site. Contaminant concentrations detected in the two samples collected from on the north portion of the site were not significant in the zero to four foot range but exceeded RCLs at the six to eight foot sample depth. RCLs based on protection of groundwater for naphthalene and phenanthrene were exceeded at multiple locations and depths.

Groundwater: Groundwater samples collected from temporary wells were analyzed for volatile organic compounds (VOCs), metals and PAHs. No VOCs were detected above ch. NR 140 Wis. Adm. Code preventive action limits. Chloride (TW-2) and chrysene (TW-5) were the only contaminants reported in exceedance of ch. NR 140 Wis. Adm. Code enforcement standards and the reported concentration of chrysene was flagged by the laboratory as an estimated value.

Remedial Action Plan
The remedial action proposal for the southern portion of the site is to eliminate the risk to human health based on direct contact by removing the concrete pavement and fill material within the top four feet of proposed ground surface elevation. Excavated material will be disposed of off-site and clean fill will be imported to bring the site to the desired grade. No remedial actions are proposed for the north side of the site.

No further action with respect to groundwater is proposed.

Site Investigation/Remedial Action Plan approval
Based on information submitted, the Department will not require any additional investigation of soil/fill or groundwater at the site. Monitoring wells may be abandoned.

The remedial action plan is approved based on the following assumptions.

- Storage and disposal of excavated fill will be handled as a solid or hazardous waste in compliance with applicable statutes and rules.
- Site closure under ch. NR 726 Wis. Adm. Code will be based on placing the site on the Department's GIS Registry for soil and groundwater exceedances.
- Site closure will be based on the proposed use of the property as greenspace and maintenance of the grass and landscaped areas on the north portion of the site.
- The property owner will be required to apply for a new exemption to ch. 506.085 Wis. Adm. Code. in the event of a change in property use or disturbance of fill material beyond what is proposed in the RAP.

The Department appreciates the efforts you have taken and propose to take to investigate and restore the environment at this site. Please do not hesitate to contact me at (414) 263-8533 if you have any questions or concerns regarding this letter.

Sincerely,

Nancy D. Ryan, Hydrogeologist
Remediation and Redevelopment

Cc: SER case file
Stephen Meer, Sigma – electronic copy only