



July 17, 2018

Freshwater Plaza Corp.  
c/o Mr. Mark Lake  
Wangard Partners, Inc.  
1200 N. Mayfair Rd. Suite 310  
Milwaukee, WI 53226

Mr. Dan Casanova  
Redevelopment Authority City of Milwaukee  
809 N. Broadway  
Milwaukee, WI 53202

Subject: Technical Assistance Review Response  
Freshwater Plaza Lot 4, 200 E. Greenfield Ave., Milwaukee, WI  
BRRTS #02-41-576420 FID#341267960

Dear Messrs. Lake and Casanova:

The Wisconsin Department of Natural Resources (DNR) has received the May 15, 2018 Project Status Update & Technical Assistance Request (TA Request) for the Freshwater Plaza Lot 4 site (Lot 4). The report, review fee and a request for technical review and response were submitted on behalf of Freshwater Plaza Corp. by The Sigma Group (Sigma). At the request of the DNR, Sigma also provided clarification of soil management activities that occurred on Lot 4 in an email dated July 2, 2018 from Adam Roder of Sigma. Based upon review of the TA Request and the July 2, 2018 email, the DNR provides the following responses to Sigma's request.

#### Site Investigation

Sigma requests concurrence from the DNR that the site investigation conducted on Lot 4 is complete. Based on information provided in the TA Request and previously submitted information including the Site Investigation and Remedial Action Plan Report (SI/RAP) dated November 10, 2014, the DNR agrees that the extents and degree of soil and groundwater contamination are sufficiently defined on Lot 4. No further soil or groundwater investigation is needed; however, soil contamination data from Freshwater Plaza Lot 1 used to characterize the soil/fill that was disposed of on Lot 4 must be included in residual contamination soil tables and maps prepared for case closure of Lot 4.

#### Remedial Action Plan

The TA Request describes an updated redevelopment plan proposed for the site as a mixed-use retail/residential building complex. The new redevelopment plan is similar to the previously approved plan presented in the SI/RAP and consists of construction of engineered barriers including asphalt/concrete parking lots, buildings, and 24-inch clean soil covers. Active sub-slab depressurization systems (SSDS) are proposed to be installed below each building. The DNR concurs that features of the redevelopment will provide appropriate barriers to address direct contact and protection of groundwater concerns associated with residual soil contamination. Based on the presence of methane in the sub-surface, active sub-slab venting below site buildings is required as a condition of the Conditional Grant of Exemption issued by the DNR to allow building on an historic fill site. The potential risk of vapor intrusion from volatile chemicals should be re-assessed based on the new redevelopment plan to determine whether vapor intrusion is a pathway of concern and operation of a SSDS is needed to address this risk.

Soil Management under Wis. Adm. Code ch. NR 718

Sigma has requested clarification from the DNR on whether PCB-contaminated soil excavated during redevelopment activities on Lot 4 could potentially be re-used on-site or off-site under Wis. Adm. Code ch. NR 718. The DNR would consider on-site re-use of PCB-contaminated soil although additional sampling may be needed to characterize the material proposed to be relocated. The DNR will not consider approval for disposal at a facility such as the R & R Excavating site. We may, under certain site-specific conditions, consider allowing relocation of PCB-contaminated soil to an off-site property; however, this likely would apply only to soil with concentrations of PCBs less than one mg/kg.

The DNR appreciates the efforts you are taking to investigate and restore the environment at this site. Please contact me at (414) 263-8533 or at [nancy.ryan@wisconsin.gov](mailto:nancy.ryan@wisconsin.gov) if you have any questions regarding this letter.

Sincerely,



Nancy D. Ryan, Hydrogeologist  
Remediation and Redevelopment Program

Cc: Adam Roder, Sigma – electronic copy