

3636 N. 124<sup>th</sup> Street Wauwatosa, WI 53222

### Site Investigation Work Plan Community Within the Corridor Limited Partnership - West Block 3212 W. Center St., 2727 N. 32nd St., and 2758 N. 33rd St., Milwaukee, WI 53210 BRRTS #: 02-41-587376, FID #341333190



Submitted To: Wisconsin Department of Natural Resources Remediation and Redevelopment 2300 North Martin Luther King Drive Milwaukee WI, 53212



March 31, 2021

Project # 40443

Ms. Theadora Jorgensen Remediation and Redevelopment Program Wisconsin Department of Natural Resources 2300 North Martin Luther King Drive Milwaukee WI, 53212

Subject: Site Investigation Work Plan Community Within the Corridor Limited Partnership - West Block 3212 W. Center St., 2727 N. 32nd St., and 2758 N. 33rd St., Milwaukee, WI 53210 BRRTS #: 02-41-587376, FID #: 341333190

Dear Ms. Jorgensen:

Enclosed, please find a Site Investigation Work Plan which K. Singh & Associates, Inc. has prepared for the referenced project. The assessment will be conducted in accordance with NR 716 of the Wisconsin Administrative Code.

If we can be of further assistance in discussing this report with you, please contact us.

Sincerely,

K. SINGH & ASSOCIATES, INC.

een Beboursch

Aileen Zebrowski, E.I.T. Staff Engineer

Pratap N. Singh, Ph.D., P.E. Principal Engineer



Dan Belgar

Daniel K. Pelczar CPG, P.G. Senior Geologist

#### SITE INVESTIGATION WORK PLAN COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - WEST BLOCK 3212 W. CENTER ST., 2727 S. 32ND ST., AND 2758 N. 33<sup>RD</sup> ST. MILWAUKEE, WI 53210 BRRTS #: 02-41-587376, FID #: 341333190

#### MARCH 31, 2021

#### PREPARED BY

K. SINGH & ASSOCIATES, INC. ENGINEERS, SCIENTISTS, AND ENVIRONMENTAL CONSULTANTS 3636 N. 124th STREET, SUITE 100 WAUWATOSA, WI 53222 (262) 821-1171 (262) 821-1174 FACSIMILE www.ksinghengineering.com

#### PREPARED FOR

ROERS COMPANIES ATTN: MR. SHANE LAFAVE 110 CHESHIRE LANE, SUITE 120 MINNETONKA, MN 55305

PROJECT #40443



#### SITE INVESTIGATION WORK PLAN COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - WEST BLOCK 3212 W. CENTER ST., 2727 S. 32ND ST., AND 2758 N. 33<sup>RD</sup> ST. MILWAUKEE, WI 53210 BRRTS #: 02-41-587376, FID #: 341333190

This report was prepared by:

Daniel K. Pelczar, CPG, P.G. Senior Geologist

P.G. # 1158 - 013 Date: July 31, 2022

"I, Daniel K. Pelczar, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, the information contained in this document is correct and the document was prepared in compliance with applicable requirements in chs. NR 700 to 726, Wis. Adm. Code."

Jan Selzar

This report was reviewed by:

Pratap N. Singh, Ph.D., P.E. Principal Engineer P.E. # 22177 – 006 Date: July 31, 2022

"I, Pratap N. Singh, hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code."

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#### SECTION I. INTRODUCTION

#### 1.1 **Project Description**

The CWC facility is being reported under two individual properties: East Block (2748 N. 32nd Street and 2784 N. 32nd Street) and West Block (3212 W. Center Street, 2727 N. 32nd Street, and 2758 N. 33rd Street). This Site Investigation Work Plan (SIWP) pertains to the West Block.

Historically, the West Block of the facility served various industrial purposes for over 100 years. The West Block building complex was recently used as storage and is currently vacant but planned construction for redevelopment started in February 2021 which entails affordable housing, commercial space, and other amenities in the former industrial complex. A site location map is provided as Figure 1.

KSingh performed a Phase II Environmental Site Assessment (ESA) to identify and provide information regarding potential impacts within the facility from historical land use in April 2020. Soil borings B-1 to B-6 were performed to depths of ten to twenty feet (below ground surface) bgs on April 10, 2020, to assess areas of contamination in the West Block of the facility. Soil samples were collected and analyzed for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), Resource Conservation and Recovery Act (RCRA) metals, and polychlorinated biphenyls (PCBs). The RCRA metal arsenic was detected above the industrial direct contact protection Residual Contaminant Levels (RCLs) but below the established background threshold value. All other detections were below respective groundwater protection RCLs. Groundwater was not encountered in any of the borings.

Based on the elevated levels of VOCs in the related East Block property performed November 2020 through March 2021, a sub-slab investigation of the West Block buildings was requested by WDNR.

The property is in the Southwest ¼, of the Northeast ¼, of Section 13, Township 7 North, Range 22 East, and the elevation of the site ranges between 700 to 710 feet mean sea level (MSL). The overall topography of the site area slopes gradually to the east. Groundwater generally follows the topography and likely flows to the east, towards Lake Michigan. However, the local groundwater flow is determined to be west based on the Wisconsin Department of Natural Resources (WDNRs) Bureau of Remediation and Redevelopment Tracking System (BRRTS) closed sites within the East Block.

The property has the following WTM Coordinates (approximate center of subject site):

WTMX 686,534 WTMY 290,491

The property is owned by Roers Investments LLC. KSingh obtained acreage and zoning information from the Milwaukee County Land Information System database available online (1, 2). The three parcels total approximately 2.83 acres and are all zoned as IM – Industrial Mixed.

Responsible Party: Roers Companies Attn: Mr. Shane LaFave 110 Cheshire Lane, Suite 120 Minnetonka, MN 55305



Office: (763) 285-8795 Cell Phone: (763) 300-1861 shane@roerscompanies.com

Project Consultant: Mr. Daniel K. Pelczar, CPG, P.G. K. Singh & Associates, Inc. 3636 North 124<sup>th</sup> Street, Wauwatosa, WI 53222 (262) 821-1171 ext. 112 dpelczar@ksinghengineering.com

#### 1.2 Site History

KSingh reviewed information on the WDNRs BRRTS website (3) regarding a listing of case files for the subject site of which there are none as of the writing of this report.

KSingh previously prepared the following documents:

- Phase II Environmental Site Assessment (ESA) Phase II Environmental Site Assessment Report for Community Within the Corridor, located at 2748 N 32nd Street, 3212 West Center Street, 2727 N 32nd Street, 2758 N 33rd Street, 2784 N 32nd Street, Milwaukee, Milwaukee County, Wisconsin prepared by K. Singh & Associates, Inc., May 24, 2020 (4).
- West Block Sub-Slab Vapor and Soil Investigation for Community Within the Corridor Limited Partnership 3212 West Center Street, 2727 N. 32nd Street, 2758 N. 33rd Street in Milwaukee, WI prepared by K. Singh & Associates, Inc., March 18, 2021 (5).
- Notification For Hazardous Substance Discharge (Non-Emergency Only), Form 4400-225 (R 02/20) prepared by K. Singh & Associates, Inc., March 24, 2021 (6).

The WDNR issued a Responsible Party (RP) letter for the Community Within the Corridor – West Block located at 3212 W. Center St., 2727 N. 32<sup>nd</sup> St. and 2758 N. 33<sup>rd</sup> St., Milwaukee, Wisconsin on March 29, 2021, and assigned the subject site to BRRTS #: 02-41-587376. A copy of the RP letter is provided as Appendix A.

Previous SSV analytical results are summarized in Tables 1 and 2. Previous soil analytical results are summarized in Table 3.

#### 1.3 Purpose and Scope

The purposes of this work plan is to complete a Site Investigation (SI) Report in accordance with NR 716 (7) for the subject site. The specific scope and objectives of the SIWP are as follows:

- 1. Prepare a work plan to characterize the nature, degree, and extent of contamination in soil, groundwater, and sub-slab vapors in the proximity of the subject site;
- 2. Conduct an on-site site investigation;



- 3. Evaluate groundwater quality with respect to the NR 140 Enforcement Standard (ES) and Preventive Action Limit (PAL) in developable groundwater (>0.2 gallons/minute) (8);
- Evaluate soil contamination with respect to NR 720 Residual Contaminant Levels for direct-contact exposure pathway in the upper 4 feet of soil and the protection to groundwater exposure pathway (9);
- 5. Perform two quarterly groundwater sampling events;
- 6. Perform sub-slab vapor sampling; and
- 7. Prepare a SI Report consistent with the requirements of the State of Wisconsin (NR 716).

#### 1.4 Report Organization

This report is organized into four sections. Section I briefly discusses regulatory background, purpose and scope, and report organization. Section II provides a review of the background information and a brief description of characterization activities in the project area. Section III includes the work plan for the site investigation and Section IV includes references. Figures and Tables are included after references.



#### SECTION II. PROJECT CONCEPTUALIZATION

#### 2.1 Conceptual Site Model

Based on the site background, KSingh has developed a conceptual site model for the subject site. Subsurface conditions for the West Block based on the Phase II ESA data (B-1 through B-6) consist of native light brown, brown, brownish gray to grayish brown silty clays to sandy clays to the maximum depth explored of 20 feet bgs. There were some lenses of clayey sand, sand, sand and gravel which were dry to moist upon drilling. An exception was at B-5/TW-1, of which a light brown, dry to moist, sand and gravel layer was present from approximately 5.5 to 11.5 feet deep. On the East Block weathered dolomite was encountered at approximately 32 feet bgs in one of the soil borings.

The overall topography of the site area slopes gradually to the east. Groundwater generally follows the topography and likely flows to the east, towards Lake Michigan.

There were no soil samples exceeding the State of Wisconsin RCLs based on the Phase II ESA (May 2020) report for VOCs, PAHs, RCRA Metals and PCBs. Since only one temporary groundwater monitoring well (B-5/TW-1) was installed and was dry the groundwater risks are currently unknown.

After the Phase II ESA, further site investigation activities (March 2021) were performed to evaluate subslab vapor and soil quality conditions within the footprint of the existing buildings. These buildings are currently undergoing remodeling as part of site redevelopment for this project. The following conclusions were drawn from these 2021 site investigation activities:

- Chlorinated solvents tetrachloroethene (PCE) and trichloroethene (TCE), and the constituent 1,4-Dioxane, were detected in SSV samples under the existing building at concentrations exceeding Residential Vapor Risk Screening Levels (VRSLs).
- Chlorinated solvents (PCE, TCE, 1,2-Dichlorobenzene and 1,4-Dichlorobenzene) and one petroleum compound (Benzene), were detected in soil samples exceeding NR 720 RCLs for groundwater protection.
- PCB-1254 was detected in soil samples exceeding the NR 720 RCLs for groundwater protection and direct contact protection for industrial use.
- No direct correlation is evident between the results of the initial SSV and soil sampling.

The site and the surrounding area are supplied with drinking water from Lake Michigan via the City of Milwaukee. No drinking water risks exist for the subject site and surrounding properties. There are no private drinking water wells within 1,200 feet of the site which will need to be sampled.

To the best of KSingh's knowledge, there are no sensitive species, habitats or ecosystems, wetlands, resource waters, sites of historical/archaeological significance within 1,200 feet of the site. No further investigations will be necessary for those receptors based on planned construction requirements on the subject site.

No off-site up-gradient properties are present within <sup>1</sup>/<sub>4</sub>-mile of the property that have the potential to contribute to contamination of the subject site.



Regarding emerging contaminants like Perfluoroalkyl and Polyfluoroalkyl (PFAS) parameters the subject site did not manufacture PFAS containing items described within the WDNR Guidance document (10); therefore, PFAS parameters are not planned on being tested for in either soil or groundwater.

The amount of soil, groundwater and sub-slab vapor contamination is currently unknown. As a result of the proposed SI, we anticipate delineating further the extent of soil and subsurface vapor, and to determine if there is a groundwater risk.

#### 2.2 Regulatory Consideration

The WDNR has jurisdiction for the project. Work in the project site is anticipated to be performed on the subject property.

#### 2.3 Additional Data Needs

The magnitude and extent of soil, groundwater and subsurface vapor contamination will be determined through the performance of the Site Investigation outlined in this work plan. No additional data is needed at this time.



#### SECTION III. SITE INVESTIGATION PLAN

#### 3.1 Introduction

The SIWP plan for the SI is a detailed plan that will be developed and followed throughout the SI process. This will lead to a characterization of the nature, extent and rate of migration of a release of environmental contaminants. This plan will address several components, which are as follows:

- 1. Description of the current situation;
- 2. Development of procedures for characterizing the contaminant source, the environmental setting, assembling available monitoring data, the establishment of monitoring procedures and data collection procedures;
- 3. Identification of potential receptors;
- 4. Health and safety procedures;
- 5. A schedule for specific site assessment activities;
- 6. Quality Assurance / Quality Control (QA/QC) Procedures; and
- 7. Data Management Procedures.

#### 3.2 Description of Current Situation and Rationale for Additional Data Needs

The existing information is not sufficient to determine the horizontal and vertical extent of contamination on the site or the potential for sub-slab vapors to impact the proposed buildings. The performance of soil borings, groundwater monitoring well installation, trench and soil probe soil sampling and sub-slab vapor sampling are proposed to determine the impacts of contamination on the subject site.

This program is designed to fill the existing data gaps. Using data compiled during this assessment, the need for actions required for managing and mitigating environmental contamination encountered during construction in soil, groundwater and subsurface vapor will be determined.

#### 3.3 Proposed Approach

Based on a review of the background information and the rationale for additional data needs for determining the nature of the contamination, a program of soil borings, monitoring well installations, and sub-slab vapor points are proposed. The program is described briefly in subsequent subsections.

#### 3.3.1 Performance of Soil Borings

#### HSA Soil Sampling

A program, consisting of performing five soil borings (WB-MW-1 through WB-MW-5) to 30 feet bgs, for determining the impact of contamination on the subsurface is proposed. All sampling will be performed on unsaturated samples. The locations of the proposed soil borings are shown on Figure 2. The actual locations of the soil borings may need to be modified in the field based on accessibility and the presence of utilities. Soil borings will be conducted utilizing a conventional drilling rig using Hollow Stem Augers (HSAs).

The soil borings proposed for the investigation should be sufficient to delineate the extent of contamination on the subject site. Off-site soil borings may be necessary if contamination is not delineated by the



proposed on site soil borings. The selected driller will be responsible for their equipment decontamination following company policies.

#### Trench and Soil Probe Soil Sampling

In addition, seventeen (17) soil samples will be collected by hand either from currently excavated underground plumbing trenches using hand tools or from a sub-slab 0.5-inch in diameter soil sampling probe to a depth of two (2) feet. Field staff will be responsible for equipment decontamination between sample points.

#### 3.3.2 Installation of Monitoring Wells

Five (5) soil borings will be converted into monitoring wells as shown on Figure 3. Currently no groundwater quality data exists for the West Block properties as the previous temporary well installed during the Phase II ESA were dry to 20 feet below ground surface. The proposed well screen depths are estimated to be between 8 to 23 feet bgs with planned 15-foot screens.

Since HSA drilling methods will be used, conventional groundwater monitoring wells will be constructed in accordance with NR 141 (11). The 2-inch diameter monitoring wells will be developed in accordance with NR 141. The selected driller will be responsible for their equipment decontamination following company policies.

#### 3.3.3 Installation of Sub-slab Vapor Probes

Sub-slab vapor probes will be installed into the building subsurface in the underground garage area. Based on the requirements of WDNR Publication RR-800 "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin", eleven (12) sub-slab vapor probes (WB-SS-15 through WB-SS-25) are proposed to be installed. The location of the vapor probes is shown on Figure 4.

### 3.4 Engineering Survey

A map of the project area will be prepared including soil borings, monitoring wells, and sub-slab vapor probes as a part of the proposed investigation. Surface elevations and State Plane Coordinates will be determined for each soil boring.

### 3.5 Regional Geology and Hydrogeology

Published and other existing materials about the regional geologic conditions, groundwater occurrences and behavior will be reviewed. This data will provide a framework for the understanding of the site that can be used as an aid in interpreting site-specific data. Specific questions, such as the occurrence of a nearsurface aquifer, regional groundwater flow directions, the effect of surface water on groundwater conditions in the near-surface aquifer, and regional groundwater quality, especially as it pertains to the near-surface aquifer, will be investigated.

### 3.5.1 Site Geology and Hydrogeology



Some site-specific geologic data are available for the subject site. Proposed soil borings and the monitoring well data will provide additional information about the nature, permeability, and on-site transport of contaminants into the subsurface environment.

### 3.6 Soil Testing

The drilling method utilized will be a conventional drilling rig using an HSA process, which advances a 2inch diameter steel tube that is 2 feet in length. A two-foot soil sample (24-inches) will be collected every two and one-half feet to the target depth, in accordance with ASTM D 1586-18.

Soil samples will be subjected to qualitative screening in the field for volatile organic compounds using a photoionization detector (PID). Soil samples for laboratory analysis will be selected based on PID readings and/or field observation. It is planned that two "grab" soil samples per boring will be collected for laboratory testing unless noted below. The estimated depths of the collection will be from 1 to 4 feet bgs (shallow) and just above the water table (deeper) to define the unsaturated vertical extent of the contamination. Soil samples will be preserved in the field and put on ice, transported to a certified laboratory using chain-of-custody procedures, and tested for the following parameters:

### HSA Soil Sampling

- VOCs in accordance with EPA Method 8260B (both shallow and deeper samples).
- PAHs in accordance with EPA Method 8270D (shallow soil samples only).
- PCBs in accordance with EPA Method 8082A (shallow soil samples only).

### Trench and Soil Probe Soil Sampling

- VOCs in accordance with EPA Method 8260B.
- PCBs in accordance with EPA Method 8082A.

The selected laboratory will perform QA/QC procedures in accordance with the company policies.

### 3.7 Groundwater Monitoring

Two (2) quarterly groundwater monitoring sampling events are proposed. Depth to groundwater in each of the monitoring wells will be measured before sampling, purge volumes will be calculated in accordance with WDNR's Groundwater Sampling Field Manual (13), and sampling will be performed after purging is complete. Groundwater samples will be preserved in the field and put on ice, transported to a certified laboratory using chain-of-custody procedures, and tested for VOCs in accordance with EPA Method 8260B. The selected laboratory will perform QA/QC procedures in accordance with the company policies. In addition, hydraulic conductivity testing will be performed as part of the NR 716 process.

## 3.8 Sub-slab Vapor Testing

Based on the requirements of WDNR Publication RR-800 "Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin" (12), a second iteration of sub-slab vapor testing will be performed to define the horizontal extent of vapor contamination. Samples will be collected in 6-liter Summa canisters and transported to the laboratory via chain-of-custody to be analyzed for VOCs via EPA Method TO-15. The eleven (11) proposed sub-slab vapor locations are presented on Figure 4.



In addition, a PID will be utilized to screen penetrations and nearby utilities for the presence of VOCs as part of a utility / preferential pathway investigation.

#### 3.9 Health and Safety Plan

Protecting the health and safety of the investigative team, as well as the general public, is a major concern during the field investigation. This is particularly important in cases where workers may be exposed to known or unknown chemicals, heat stress, physical stress, slips/trips/falls, biologic agents, equipment-related injuries, fire and explosion. Many of these hazards are encountered in any type of field study, but exposure to chemical hazards, including toxicity, is a major concern for the investigative team that needs to be addressed.

Chemical hazards in soil and groundwater associated with the historical use of the site are of principal concern. Particulate emissions in the air may also be a concern. A PID will be used to monitor the quality of air at the project site. Because the investigation will not be conducted in a confined space, special precautions may not be required. However, Level D protection will be required for the staff actively involved in the implementation of the field work.

Level D protection is primarily a work uniform. Level D personal protective equipment includes:

- 1. Coveralls;
- 2. Reflective safety vest;
- 3. Gloves;
- 4. Boots/shoes, chemical-resistant steel toe and shank;
- 5. Safety glasses or chemical splash goggles; and
- 6. Hard hat.

The field investigation team will be required to take precautions at Level D. A higher level of protection may be required if data gathered during the field investigation indicates high concentrations of VOCs in ambient air using a PID.

Field staff shall utilize disposable supplies to prevent cross-contamination between samples.

#### 3.10 Permits and Investigation Derived Waste

While the SI is underway, permits for the temporary storage of soil and contaminated groundwater and a conceptual plan for treatment or off-site disposal will be initiated, if necessary. The final permitting requirements will depend on source identification and selected corrective action technology. Permits will not be needed to perform soil borings and monitoring wells on the site. If feasible, groundwater purge water will be disposed of to combined sewers via an MMSD Notice of Intent.

#### 3.11 Project Schedule

The schedule for site assessment activities is based on favorable weather conditions and obtaining approvals in a timely manner. The following schedule is proposed to expedite the completion of SI Report.



- Start trench and soil probe soil sampling and sub-slab vapor probes;
- Start monitoring well installations;
- Zone of influence testing for sub-slab vapor probes (interim report);
- Perform survey of new borings, monitoring wells, and vapor points;
- Develop and sample groundwater monitoring wells (first round);
- Sample groundwater monitoring wells (second round);
- Submit SI Report.

April 20, 2021 April 23, 2021

April 1, 2021

April 15, 2021

April 15, 2021

- June 23, 2021
- July 15, 2021



#### **SECTION IV. REFERENCES**

- 1. Web Page: http://county.milwaukee.gov/mclio Milwaukee County Land Information System
- 2. Web Page: http://assessments.milwaukee.gov
- 3. Web Page: https://dnr.wisconsin.gov/topic/Brownfields/botw.html
- Phase II Environmental Site Assessment (ESA) Phase II Environmental Site Assessment Report for Community Within the Corridor, located at 2748 N 32nd Street, 3212 West Center Street, 2727 N 32nd Street, 2758 N 33rd Street, 2784 N 32nd Street, Milwaukee, Milwaukee County, Wisconsin prepared by K. Singh & Associates, Inc., May 24, 2020.
- West Block Sub-Slab Vapor and Soil Investigation for Community Within the Corridor Limited Partnership 3212 West Center Street, 2727 N. 32nd Street, 2758 N. 33rd Street in Milwaukee, WI prepared by K. Singh & Associates, Inc., March 18, 2021
- 6. Notification For Hazardous Substance Discharge (Non-Emergency Only), Form 4400-225 (R 02/20) prepared by K. Singh & Associates, Inc., March 24, 2021.
- 7. Wisconsin Administrative Code Chapter NR 716 Site Investigations, published November 2013.
- 8. Wisconsin Administrative Code Chapter NR 140 Groundwater Quality, published August 2015.
- 9. Wisconsin Administrative Code Chapter NR 720 Soil Cleanup Standards, published November 2013.
- 10. WDNR, Site Investigation Scoping: Identifying Contaminants of Concern, DNR-RR-101E, September 2019.
- 11. Wisconsin Administrative Code Chapter NR 141 Groundwater Monitoring Well Requirements, published June 2015.
- 12. WDNR, Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, Publication RR-800, January 2018.
- 13. WDNR, Groundwater Sampling Field Manual, PUBL-DG-038 96, September 1996.



FIGURES





Figure 1 – Site Location Map

from 2018 Milwaukee Quadrangle, Wisconsin - Milwaukee County 7.5-minute series

Scale 1:24,000





Previous Boring and Temporary Well Locations

# KSingh Engineers Scientists Consultants



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CONSULTANT

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FIGURE 2

of



Previous Boring and Temporary Well Locations

- 1 Bedroom Apartment
- 2 Bedroom Apartment
- 3 Bedroom Apartment
- 4 Bedroom Apartment
- Underground Plumbing
- Proposed Monitoring Well Locations (5)



KSingh Engineers Scientists Consultants



3636 North 124th Street Wauwatosa, WI 53222 262-821-1171

CONSULTANT

CONSULTANT



FIGURE 3

of

PLOT DATE : 3/30/2021 12:42 PM PLOT BY :AILEEN ZEBROWSKI



Previous Boring and Temporary Well Locations Basement Sub-Slab Sampling Locations (5) • Level 1 Sub-Slab Sampling Locations (9) Proposed Sub-Slab Sampling Locations (11)

Approximate WI Residential VRSL Exceedance Extents





3636 North 124th Street Wauwatosa, WI 53222 262-821-1171

CONSULTANT

CONSULTANT



FIGURE 4

of

TABLES



#### TABLE 1 MARCH 2021 SUB-SLAB VAPOR ANALYTICAL RESULTS WEST BLOCK COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - MILWAUKEE, WI

	SUB-SLAB \	APOR VRSL	WB-SS-1	WB-SS-2	WB-SS-3	WB-SS-4	WB-SS-5	WB-SS-6	WB-SS-7	WB-SS-8	WB-SS-9	WB-SS-10	WB-SS-11	WB-SS-12	WB-SS-13	WB-SS-14
	AF = 0.03	AF = 0.01	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT
	74 0.00	LARGE	2/2/2021	2/2/2024	3/0/0001	2/2/2024	2/2/2024	2/2/2024	2/2/2024	2/2/2024	2/2/2024	2/2/2021	2/2/2024	2/2/2024	2/2/2024	10/16/0000
2		COMMERCIAL /	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	31212021	12/10/2020
CHEMICAL (ug/m <sup>3</sup> )	RESIDENTIAL	INDUSTRIAL	ug/m <sup>o</sup>	ug/m°	ug/m <sup>3</sup>	ug/m°	ug/m°	ug/m <sup>o</sup>	ug/m <sup>o</sup>	ug/m <sup>o</sup>	ug/m <sup>3</sup>	ug/m <sup>o</sup>	ug/m <sup>o</sup>	ug/m <sup>o</sup>	ug/m°	ug/m°
1,1,1-Trichloroethane	170,000	2,200,000	< 0.249	0.33 J	118	6.5	3.6	1.25	297	3.9	1.41	0.92	3300	34	7.9	1.69
1,1,2,2-1 etrachloroethane	1.6	21	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325	< 0.325
1,1,2-1 richloroethane	0.7	8.8 7.700	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258	< 0.258
1.1 Dichloroothono	7.000	88,000	< 0.107	< 0.107	0.00 0	< 0.107	< 0.107	< 0.107	0.4 J	< 0.107	< 0.107	< 0.107	9.0 9.1	0.107	< 0.107	< 0.107
1.2.4-Trichlorobenzene	7,000	8 800	< 0.657	< 0.21	< 0.657	< 0.21	< 0.21	< 0.21	< 0.21 < 0.657	< 0.21 < 0.657	< 0.21 < 0.657	< 0.657	< 0.657	< 0.657	< 0.657	< 0.657
1.2.4-Trimethylbenzene	210	2,600	0.49 .1	6.6	61	0.44 .1	< 0.283	0.64 .1	0.83 J	0.54 J	0.44 .1	0.49 .1	19.2	0.98	5.5	87
1.2-Dichlorobenzene	700	8.800	< 0.235	16.1	6.1	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235	< 0.235
1,2-Dichloroethane	36	470	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24	< 0.24
1,2-Dichloropropane	14	180	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28	< 0.28
1,2-Dichlorotetrafluoroethane			< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446	< 0.446
1,3,5-Trimethylbenzene	210	2,600	< 0.232	3.4	1.82	< 0.232	< 0.232	< 0.232	< 0.232	< 0.232	< 0.232	< 0.232	11.7	0.39 J	1.67	3.3
1,3-Butadiene			< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143	< 0.143
1,3-Dichlorobenzene			< 0.302	0.42 J	0.96	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	0.36 J	< 0.302
1,4-Dichlorobenzene	8	110	< 0.302	1.62	0.9 J	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302
1,4-Dioxane	18	250	< 0.157	< 0.157	34	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	2.13	< 0.157	< 0.157	< 0.157
2-Hexanone			0.74	< 0.222	8.5	< 0.222	< 0.222	0.33 J	1.43	< 0.222	< 0.222	< 0.222	1.6	2.41	< 0.222	< 0.222
4-Ethyltoluene	100.007		< 0.214	5.1	0.74	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	2.55	< 0.214	0.49 J	0.74
Acetone	106,667	1,400,000	14.1	4.9	305 10	5/	9.3	14.8	48	15.1	39	15.6	41	/1	20.5	9.5
Acroieln	120		0.44	< 0.094	0.94	< 0.094	0.6	< 0.094	< 0.094	< 0.094	0.62	< 0.094	< 0.094	0.76	0.41	< 0.094
Benzyl Chlorido	120	1,000	1.15	1.79	J.1	1.00	2.30	0.42 J	1.05	0.90	5.4	0.32 J	0.40	1.09	1.10	0.00
Bromodichloromethane	2.53	23	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	0.203	< 0.203	< 0.203	< 0.205
Bromoform	86.6	1 100	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.414	< 0.014
Bromomethane	17.3	220	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Carbon Disulfide	2,433	31,000	6.2	0.59	14.6	9.4	0.28 J	2.68	2.24	1.93	15.6	1.12	19.8	3.4	0.218 J	2.18
Carbon Tetrachloride	156	2,000	0.69 J	0.5 J	< 0.307	3.4	0.5 J	0.88 J	10.3	< 0.307	< 0.307	< 0.307	< 0.307	0.76 J	< 0.307	< 0.307
Chlorobenzene	173	2,200	< 0.251	20.8	0.97	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251
Chloroethane	33,333	440,000	< 0.159	2.77	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	0.84	< 0.159	< 0.159
Chloroform	3,100	39,000	< 0.3	0.34 J	< 0.3	0.78 J	< 0.3	< 0.3	0.97	< 0.3	< 0.3	< 0.3	9	0.44 J	< 0.3	< 0.3
Chloromethane	3,100	39,000	< 0.831	< 0.831	< 0.831	< 0.831	1.61 J	< 0.831	< 0.831	< 0.831	< 0.831	< 0.831	< 0.831	4.7	< 0.831	< 0.831
cis-1,2-Dichloroethene			< 0.197	0.75	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197
cis-1,3-Dichloropropene			< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234	< 0.234
Cyclonexane	3,333	44,000	2.80	4.1	2.62	2.80	0.55 J	0.241 J	0.41 J	< 0.212	0.59 J	< 0.212	0.38 J	1.17	1.45	3.3
Dibromochioromethane	2 200	44.000	< 0.370	< 0.370 0.97	< 0.370 2.62	< 0.370 2.97	< 0.370 2.62	< 0.370 2.57	< 0.370 2.52	< 0.370 0.77	< 0.370	< 0.370 2.72	< 0.370 2.57	< 0.370 0.27	< 0.376	1.52
EDB (1 2-Dibromoethane)	0.157	44,000	< 0.342	< 0.3/2	< 0.342	< 0.3/2	< 0.342	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2	< 0.3/2
Ethanol			37	19.1	170 10	283	32	179 10	102	12.6	45	27 7	67	83 10	43	29.7
Ethyl Acetate			16.7	< 0,176	< 0.176	1.62	< 0.176	< 0,176	< 0,176	< 0,176	1,48	< 0.176	< 0,176	< 0,176	4.6	< 0.176
Ethylbenzene	370	4,900	0.82	17.1	3.6	0.61 J	0.39 J	0.61 J	0.65	0.39 J	1.04	< 0.203	0.39 J	1.17	0.87	3.9
Heptane			19.4	4.7	6.5	1.8	1.1	0.9	1.92	1.27	27.4	< 0.265	0.65 J	4.5	5.7	11.8
Hexachlorobutadiene	4.3	56	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489	< 0.489
Hexane	1,400	18,000	8.7	340	42	1.83	34	2.64	1.62	2.36	38	0.74 J	1.2	3.9	6.3	5.4
Isopropyl Alcohol			7.3	3.8	32	15.5	3.5	14.8	25.5	1.67	8.6	5.7	15	12.6	8.7	3.6
m&p-Xylene	333	4,400	1.39	15.7	7.4	2.17	1 J	1.17 J	1.56	0.74 J	1.21	0.56 J	1 J	1.95	1.91	13.9
Methyl ethyl ketone (MEK)	17,333	220,000	6	2.18	96	14.1	3.4	2.15	12.9	43	13.5	6.1	8.6	17.4	6.7	6.2
Methyl isobutyl ketone (MIBK)	10,333	130,000	0.98	< 0.168	6.4	0.57	< 0.168	0.86	1.88	0.98	1.15	0.78	1.96	3.07	0.53 J	1.06
Methyl Methacrylate			< 0.217	< 0.21/	< 0.21/	< 0.21/	< 0.21/	< 0.217	< 0.217	< 0.217	< 0.217	< 0.217	< 0.217	< 0.217	< 0.21/	< 0.21/
Methylone chloride	3,700	47,000	< 0.10 < 0.150	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10 < 0.150								
Naphthalono	21,000	200,000	< 0.159 < 0.675	< 0.159 < 0.675	<ul> <li>U.159</li> <li>13.3</li> </ul>	< 0.159 < 0.675										
	3 300	44 000	0.61	× 0.075 8	3 12	0.075	0.075	0.075	0.075	0.075	0.65	0.075	< 0.075 1	0.075	13	77
Propene			< 0.079	< 0.079	< 0.079	< 0.079	< 0.79	< 0.02	< 0.079	< 0.079	< 0.079	< 0.079	< 0.079	< 0.079	< 0.079	< 0.079
Styrene	3,333	44.000	0.255 J	0.298 J	0.298 J	< 0.181	< 0.181	< 0.181	< 0.181	< 0.181	0.213 J	< 0.181	< 0.181	< 0.181	< 0.181	0.213 J
	.,	,		0	0											

#### TABLE 1 MARCH 2021 SUB-SLAB VAPOR ANALYTICAL RESULTS WEST BLOCK COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - MILWAUKEE, WI

	SUB-SLAB \	SUB-SLAB VAPOR VRSL		WB-SS-2	WB-SS-3	WB-SS-4	WB-SS-5	WB-SS-6	WB-SS-7	WB-SS-8	WB-SS-9	WB-SS-10	WB-SS-11	WB-SS-12	WB-SS-13	WB-SS-14
	AF = 0.03	AF = 0.01	PRE-DEVELOPMENT	PRE-DEVELOPMEN												
		LARGE	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	12/16/2020
CHEMICAL (ug/m <sup>3</sup> )	RESIDENTIAL	INDUSTRIAL	ug/m <sup>3</sup>													
Tetrachloroethene (PCE)	1,400	18,000	4.4	5.9	10.6	24.7	127	80	4700	5.9	9.6	12.8	15.5	3.5	1.09	4.6
Tetrahydrofuran	7,000	88,000	0.85	< 0.131	0.91	1.24	< 0.131	< 0.131	1.15	12.2	2.59	9.8	< 0.131	12.1	2.86	5.1
Toluene	170,000	2,200,000	5.6	12.5	21.2	6.8	6.4	5.2	7	23.2	11.7	5.4	6.1	12.9	9.1	12
trans-1,2-Dichloroethene			< 0.231	1.15	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231
trans-1,3-Dichloropropene			< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198	< 0.198
Trichloroethene (TCE)	70	880	0.54 J	1.77	0.96	380	1.12	< 0.237	111	0.86	2.89	3.7	26.9	2.2	2.62	< 0.237
Trichlorofluoromethane			1.8	1.69	1.29	3.3	1.29	2.13	7.8	1.97	1.74	7	2.47	27.8	11.2	18.2
Trichlorotrifluoroethane			0.69 J	0.61 J	3.9	2.07	0.54 J	0.61 J	3.8	0.54 J	0.54 J	0.54 J	0.46 J	< 0.402	< 0.402	< 0.402
Vinyl acetate	700	8,800	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203	< 0.203
Vinyl Chloride	57	2,800	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	0.46 J	< 0.148	< 0.148	0.64	< 0.148	< 0.148

#### Comments

All results in micrograms per cubic meter (ug/m<sup>3</sup>)

"J" Flag = Analyte detected between Limit of Detection and Limit of Quantitation

"10" Code = Linear Range of Calibration Curve Exceeded

VRSL = Vapor Risk Screening Levels

BOLD indicates detection is above Large Commercial / Industrial VRSLs

Italics indicates detection is above Residential VRSLs

#### TABLE 2 MARCH 2021 SUB-SLAB VAPOR ANALYTICAL RESULTS FOR CONTAMINANTS OF CONCERN WEST BLOCK COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - MILWAUKEE, WI

	SUB-SLAB \	APOR VRSL	WB-SS-1	WB-SS-2	WB-SS-3	WB-SS-4	WB-SS-5	WB-SS-6	WB-SS-7	WB-SS-8	WB-SS-9	WB-SS-10	WB-SS-11	WB-SS-12	WB-SS-13	WB-SS-14
	AF = 0.03	AF = 0.01	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT	PRE-DEVELOPMENT
		LARGE	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	3/2/2021	12/16/2020
	DEGIDENTIAL	COMMERCIAL /	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	0/2/2021	12/10/2020
CHEMICAL (ug/m <sup>-</sup> )	RESIDENTIAL	INDUSTRIAL	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m	ug/m
1,1,1-1 richloroethane	170,000	2,200,000	< 0.249	U.33 J	118	0.5	3.0	1.25	297	3.9	1.41	0.92	3300	34	7.9	1.69
1,1-Dichloroethane	7,000	7,700	< 0.107	< 0.107	0.30 J	< 0.107	< 0.107	< 0.107	0.4 J	< 0.107	< 0.107	< 0.107	0.0	< 0.107 0.277 L	< 0.107	< 0.107
1.2.4 Trimothylbonzono	7,000	2 600	0.21	< 0.21 6.6	< 0.21 6.1	< 0.21 0.44 L	< 0.21	< 0.21 0.64 L	0.83	0.21	< 0.21 0.44 L	0.40	10.2	0.277 J	5.5	< 0.21 8.7
	210	2,000	0.49 J	16.1	6.1	0.44 J	< 0.205	< 0.04 J	- 0.03 J	0.04 J	< 0.225	0.49 J	13.2	< 0.30	- 0.225	0.7
1.3.5-Trimethylbenzene	210	2 600	< 0.233	3.4	1.82	< 0.233	< 0.233	< 0.233	< 0.233	< 0.233	< 0.233	< 0.233	< 0.233 11.7	0.200	167	33
1.3-Dichlorobenzene	210	2,000	< 0.302	0.42	0.96	< 0.202	< 0.302	< 0.202	< 0.202	< 0.302	< 0.302	< 0.202	< 0.302	< 0.302	0.36	< 0.302
1 4-Dichlorobenzene	8	110	< 0.302	1.62	0.00	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302	< 0.302
1 4-Dioxane	18	250	< 0.157	< 0.157	34	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	< 0.157	2 13	< 0.157	< 0.157	< 0.157
2-Hexanone			0.74	< 0.222	8.5	< 0.222	< 0.222	0.33 J	1 43	< 0.222	< 0.222	< 0.222	16	2 41	< 0.222	< 0.222
4-Ethyltoluene			< 0.214	5.1	0.74	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	< 0.214	2.55	< 0.214	0.49 J	0.74
Acetone	106.667	1,400,000	14.1	4.9	305 10	57	9.3	14.8	48	15.1	39	15.6	41	71	20.5	9.5
Acrolein			0.44	< 0.094	0.94	< 0.094	0.6	< 0.094	< 0.094	< 0.094	0.62	< 0.094	< 0.094	0.76	0.41	< 0.094
Benzene	120	1,600	1.15	1.79	3.7	1.85	2.36	0.42 J	1.05	0.96	5.4	0.32 J	0.48	1.69	1.18	0.86
Bromodichloromethane	2.53	33	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	< 0.374	0.54 J	< 0.374	< 0.374	< 0.374
Carbon Disulfide	2,433	31,000	6.2	0.59	14.6	9.4	0.28 J	2.68	2.24	1.93	15.6	1.12	19.8	3.4	0.218 J	2.18
Carbon Tetrachloride	156	2,000	0.69 J	0.5 J	< 0.307	3.4	0.5 J	0.88 J	10.3	< 0.307	< 0.307	< 0.307	< 0.307	0.76 J	< 0.307	< 0.307
Chlorobenzene	173	2,200	< 0.251	20.8	0.97	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251	< 0.251
Chloroethane	33,333	440,000	< 0.159	2.77	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	< 0.159	0.84	< 0.159	< 0.159
Chloroform	3,100	39,000	< 0.3	0.34 J	< 0.3	0.78 J	< 0.3	< 0.3	0.97	< 0.3	< 0.3	< 0.3	9	0.44 J	< 0.3	< 0.3
Chloromethane	3,100	39,000	< 0.831	< 0.831	< 0.831	< 0.831	1.61 J	< 0.831	< 0.831	< 0.831	< 0.831	< 0.831	< 0.831	4.7	< 0.831	< 0.831
cis-1,2-Dichloroethene			< 0.197	0.75	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197	< 0.197
Cyclohexane	3,333	44,000	2.86	4.1	2.62	2.86	0.55 J	0.241 J	0.41 J	< 0.212	0.59 J	< 0.212	0.38 J	1.17	1.45	3.3
Dichlorodifluoromethane	3,300	44,000	3.8	2.87	2.62	2.87	2.62	2.57	2.52	2.77	2.82	2.72	2.57	2.37	1.04	1.53
Ethanol			37	19.1	170 10	283	32	179 10	102	12.6	45	27.7	67	83 10	43	29.7
Ethyl Acetate			16.7	< 0.176	< 0.176	1.62	< 0.176	< 0.176	< 0.176	< 0.176	1.48	< 0.176	< 0.176	< 0.176	4.6	< 0.176
Ethylbenzene	370	4,900	0.82	17.1	3.6	0.61 J	0.39 J	0.61 J	0.65	0.39 J	1.04	< 0.203	0.39 J	1.17	0.87	3.9
Heptane			19.4	4.7	6.5	1.8	1.1	0.9	1.92	1.27	27.4	< 0.265	0.65 J	4.5	5.7	11.8
Hexane	1,400	18,000	8.7	340	42	1.83	34	2.64	1.62	2.36	38	0.74 J	1.2	3.9	6.3	5.4
Isopropyi Aiconoi			1.3	3.8	32	15.5	3.5	14.8	25.5	1.67	8.0	5.7	15	12.0	8./	3.0
Mathul athul katana (MEK)	333	4,400	1.39	10.7	1.4	2.17	1 J	1.17 J	1.00	0.74 J	1.21	0.50 J	1 J	1.95	1.91	13.9
Methyl isobutyl ketopo (MIPK)	17,333	220,000	0	2.10	90	14.1	J.4	2.15	12.9	43	13.5	0.1	0.0	2.07	0.7	0.2
	2 200	130,000	0.90	< 0.100 g	3.12	0.37	0.13	0.60	0.74	0.90	0.65 1	0.70	1.90	0.87	0.00 J	7.7
Shrono	3,300	44,000	0.255	0 208 1	0.208 1	0.07	< 0.45 J	0.J2 J	0.74	0.33 J	0.03 J	0.303 3	< 0.181	< 0.181	r.J	0.213
Tetrachloroethene (PCE)	1 400	18 000	0.235 0	5.9	10.6	2/17	127	80	4700	5.9	9.6	12.8	15.5	35	1 09	16
Tetrahydrofuran	7,000	88.000	0.85	< 0.131	0.91	1.24	< 0.131	< 0.131	1.15	12.2	2.59	9.8	< 0.131	12.1	2.86	5.1
Toluene	170.000	2.200.000	5.6	12.5	21.2	6.8	6.4	5.2	7	23.2	11.7	5.4	6.1	12.9	9.1	12
trans-1.2-Dichloroethene			< 0.231	1.15	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231	< 0.231
Trichloroethene (TCE)	70	880	0.54 J	1.77	0.96	380	1.12	< 0.237	111	0.86	2.89	3.7	26.9	2.2	2.62	< 0.237
Trichlorofluoromethane			1.8	1.69	1.29	3.3	1.29	2.13	7.8	1.97	1.74	7	2.47	27.8	11.2	18.2
Trichlorotrifluoroethane			0.69 J	0.61 J	3.9	2.07	0.54 J	0.61 J	3.8	0.54 J	0.54 J	0.54 J	0.46 J	< 0.402	< 0.402	< 0.402
Vinyl Chloride	57	2,800	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	< 0.148	0.46 J	< 0.148	< 0.148	0.64	< 0.148	< 0.148

#### Comments

All results in micrograms per cubic meter (ug/m<sup>3</sup>) "J" Flag = Analyte detected between Limit of Detection and Limit of Quantitation "10" Code = Linear Range of Calibration Curve Exceeded VRSL = Vapor Risk Screening Levels BOLD indicates detection is above Large Commercial / Industrial VRSLs Italics indicates detection is above Residential VRSLs

#### TABLE 3 MARCH 2021 SOIL ANALYTICAL RESULTS WEST BLOCK COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - MILWAUKEE, WI

Sample							B-1	B-2	B-3	B-4	B-5	B-6	WB-SS-2	WB-SS-6	WB-SS-8	WB-SS-12	WB-SS-14
Depth (feet)							5.5-7.5	4-6	4-6	4-6	3-5	3-5	0-1	0-1	0-1	0-1	0-1
Soil Type			NR 720 RCI s for GW	NR 720 RCLs - Non-	NR 720 RCLs - Industrial	Background	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY	CLAY	Sandy CLAY	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY
Soil Conditions	Units	Method	Protection (1)	Industrial Use for Direct	Use for Direct Contact	Threshold	Insaturated	I insaturated	Insaturated	Insaturated	Insaturated	Unsaturated	Moist	Unstaturated	Unsaturated	Insaturated	Unsaturated
Come Conditions				Contact Protection (1)	Protection (1)	Value	Eutories	Enteries	Eulerier	Enterior	Enterior	Eulerier	Interior	Interior	leterier	laterier	lateries
Sampling Location							Exterior	EXIGNU	EXIBIIU	EXIGNO	EXIGINI	EXIBIIU	Interior	Interior	Interior	Interior	Inteno
Sampling Date							4/10/2020	4/10/2020	4/10/2020	4/10/2020	4/10/2020	4/10/2020	3/1/2021	3/1/2021	3/1/2021	3/1/2021	3/1/2021
Physical Characteristics																	
		Percent	t Moisture				11.9	12.4	11.7	12.1	13.1	11.4	13.8	5.2	10.8	12.5	8.6
		Percer	nt Solids				88.1	87.6	88.3	87.9	86.9	88.6	86.2	94.8	89.2	87.5	91.4
Volatile Organic Compounds (VOCs)	)																1
1112 Tetrachloroethane	ma/Ka	8260B	0.0534	2.78	12.3		<0.040	<0.036	<0.039	<0.043	<0.046	<0.059	<0.030	<0.030	<0.028	<0.029	<0.027
	mg/tg	00000	0.0004	2.10	640		-0.040	-0.000	-0.000	-0.045	-0.000	-0.000	-0.000	-0.005	-0.020	-0.025	-0.027
1,1,1-Inchordeutane	iiig/kg	0200B	0.1402	040	640		<0.033	NU.U3U	NU.U32	<0.035	NU.U30	NU.040	<0.025	0.025	NU.U23	NU.U24	NU.U23
1,1,2,2-Tetrachloroethane	mg/Kg	8260B	0.0002	0.81	3.6		<0.035	<0.031	<0.033	<0.037	<0.040	<0.051	<0.026	<0.026	<0.024	<0.025	<0.024
1,1,2-Trichloroethane	mg/Kg	8260B	0.0032	1.59	7.01		<0.031	<0.028	<0.029	< 0.032	< 0.035	<0.045	< 0.023	<0.023	<0.022	< 0.022	<0.021
1,1-Dichloroethane	mg/Kg	8260B	0.4834	5.06	22.2		< 0.036	< 0.032	<0.034	< 0.038	< 0.041	<0.052	<0.027	<0.027	< 0.025	< 0.026	<0.024
1,1-Dichloroethene	mg/Kg	8260B	0.005	320	1,190		< 0.034	< 0.031	< 0.033	< 0.036	< 0.039	<0.050	< 0.025	< 0.025	< 0.024	< 0.025	< 0.023
1,1-Dichloropropene	mg/Kg	8260B					< 0.026	< 0.024	<0.025	< 0.027	< 0.030	< 0.038	< 0.019	<0.019	<0.018	< 0.019	< 0.018
123-Trichlorobenzene	ma/Ka	8260B		62.6	934		<0.040	<0.036	<0.038	<0.042	<0.046	<0.058	<0.030	<0.030	<0.028	<0.029	<0.027
1 2 3 Trichloropropage	malKa	8260P	0.0519	0.005	0.109		<0.036	<0.033	<0.035	<0.038	<0.041	<0.053	<0.027	<0.027	<0.025	<0.026	<0.025
1.2.4 Trichlarchennen	mg/tg	82600	0.409	24	112		<0.000	+0.007	<0.000	-0.000	-0.034	+0.044	+0.022	-0.020	-0.020	+0.020	<0.020
1,2,4-Thchlorobenzene	iiig/kg	0200B	0.400	24	113		NU.U3U	NU.U27	NU.U29	\$0.032	NU.U34	NU.044	RU.U22	NU.U22	NU.U21	NU.U22	NU.U2U
1,2,4-1 rimethylbenzene	mg/Kg	8260B	1.3/8/**	219	219		<0.031	<0.028	<0.030	<0.033	<0.036	<0.046	<0.023	<0.023	<0.022	<0.023	0.34
1,2-Dibromo-3-Chloropropane	mg/Kg	8260B	0.0002	0.008	0.092		<0.17	<0.16	<0.17	<0.18 *	<0.20 *	<0.25 *	<0.13	<0.13	<0.12	<0.13	<0.12
1,2-Dibromoethane	mg/Kg	8260B	0.0000282	0.05	0.221		< 0.034	<0.030	<0.032	<0.036	< 0.039	<0.049	< 0.025	<0.025	<0.024	< 0.025	<0.023
1,2-Dichlorobenzene	mg/Kg	8260B	1.168	376	376		< 0.029	<0.026	<0.028	< 0.031	< 0.033	<0.043	38	0.064 J	<0.021	<0.021	<0.020
1,2-Dichloroethane	mg/Kg	8260B	0.0028	0.652	2.87		< 0.034	< 0.031	< 0.033	< 0.036	< 0.039	<0.050	< 0.026	<0.025	<0.024	< 0.025	<0.023
1,2-Dichloropropane	mg/Kg	8260B	0.0033	3.4	15		<0.037	< 0.034	<0.036	< 0.039	<0.043	<0.055	<0.028	<0.028	<0.026	< 0.027	<0.025
1.3.5-Trimethylbenzene	ma/Ka	8260B	1.3787**	182	182		<0.033	< 0.030	<0.032	< 0.035	<0.038	<0.048	< 0.025	<0.025	<0.023	< 0.024	0.13
1.3-Dichlorobenzene	ma/Ka	8260B	1 1528	297	297		<0.035	<0.032	<0.033	<0.037	<0.040	<0.051	0.58	<0.026	<0.025	<0.025	<0.024
1.3-Dicbloropropage	malKa	8260B	0.0003	2.37	10.6		<0.032	<0.029	<0.030	<0.033	<0.036	<0.046	<0.024	<0.023	<0.022	<0.023	<0.022
1.4 Dichlorobagagag	malKa	8260P	0.144	3.74	16.0		<0.002	<0.029	<0.030	<0.034	<0.036	<0.046	5.2	<0.024	<0.022	<0.023	<0.022
	mg/tg	00000	0.144	404	10.4		-0.002	-0.025	-0.007	-0.004	-0.000	0.007	-0.000	-0.024	-0.022	-0.020	-0.022
2,2-bichloropropane	ilig/Kg	0200B		191	191		-0.039	<0.035 +0.005	<0.037	×0.041	10.044	10.007	<0.029	-0.029	0.027	0.028	0.020
2-Chlorotoluene	mg/Kg	826UB		907	907		<0.027	<0.025	<0.026	<0.029	<0.031	<0.040	<0.020	<0.020	<0.019	<0.020	<0.019
4-Chlorotoluene	mg/Kg	8260B		253	253		<0.030	<0.028	<0.029	<0.032	<0.035	<0.045	<0.023	<0.023	<0.022	<0.022	<0.021
Benzene	mg/Kg	8260B	0.0051	1.6	7.07		<0.013	<0.012	<0.012	<0.013	<0.015	<0.019	< 0.0095	<0.0095	<0.0090	<0.0093	0.47 F1
Bromobenzene	mg/Kg	8260B		342	679		< 0.031	<0.028	<0.030	< 0.033	< 0.036	<0.045	< 0.023	<0.023	<0.022	< 0.023	<0.021
Bromochloromethane	mg/Kg	8260B	-	216	906		<0.037	< 0.034	< 0.036	< 0.039	< 0.043	<0.055	<0.028	<0.028	< 0.026	< 0.027	<0.025
Bromodichloromethane	mg/Kg	8260B	0.0003	0.418	1.83		<0.032	<0.029	< 0.031	< 0.034	< 0.037	<0.047	< 0.024	<0.024	<0.023	< 0.024	<0.022
Bromoform	mg/Kg	8260B	0.0023	25.4	113		<0.042	< 0.038	<0.040	< 0.045	< 0.048	<0.062	< 0.032	<0.031	<0.030	< 0.031	< 0.029
Bromomethane	mg/Kg	8260B	0.0051	9.6	43		<0.069 *	<0.063 *	<0.067 *	< 0.073 *	< 0.080 *	<0.10 *	< 0.052	< 0.052	< 0.049	< 0.051	< 0.047
Carbon tetrachloride	ma/Ka	8260B	0.0039	0.916	4 03		<0.033	<0.030	<0.032	<0.035	<0.038	<0.049	<0.025	<0.025	<0.024	<0.024	<0.023
Chlorobenzene	ma/Ka	8260B		370	761		<0.034	<0.030	<0.032	<0.036	<0.039	<0.049	21	<0.025	<0.024	<0.025	<0.023
Chloroothano	malKa	8260P	0.2266	2 120	2 120		<0.044	<0.040	<0.042	<0.046	<0.050	<0.064	<0.033	<0.033	<0.021	<0.032	<0.030
	ingrig	02000	0.2200	2,120	2,120		-0.044	~0.040	-0.042	-0.040	-0.050	-0.004	-0.035	-0.000	-0.001	~0.032	~0.050
Chloroform	mg/Kg	8260B	0.0033	0.454	1.98		<0.032	<0.029	<0.031	<0.034	<0.037	<0.047	<0.024	<0.024	<0.023	<0.024	<0.022
Chloromethane	mg/Kg	8260B	0.0155	159	669		<0.028	<0.025	<0.027	< 0.029	<0.032	<0.041	< 0.021	<0.021	<0.020	< 0.020	<0.019
cis-1,2-Dichloroethene	mg/Kg	8260B	0.0412	156	2,340		<0.036	< 0.032	<0.034	< 0.038	<0.041	<0.052	< 0.027	<0.026	<0.025	< 0.026	<0.024
cis-1,3-Dichloropropene	mg/Kg	8260B	0.0003	1,210	1,210		< 0.036	< 0.033	<0.035	< 0.038	< 0.042	<0.053	<0.027	<0.027	<0.026	< 0.027	<0.025
Dibromochloromethane	mg/Kg	8260B	0.032	8.28	38.9		<0.042	< 0.039	< 0.041	< 0.045	< 0.049	<0.062	< 0.032	<0.032	<0.030	< 0.031	<0.029
Dibromomethane	mg/Kg	8260B		34	143		< 0.023	< 0.021	<0.023	< 0.025	<0.027	< 0.034	< 0.018	<0.018	<0.017	< 0.017	<0.016
Dichlorodifluoromethane	mg/Kg	8260B	3.0863	126	530		<0.059	<0.053	<0.056	< 0.062	<0.067	<0.086	<0.044	<0.044	<0.041	< 0.043	<0.040
Ethvibenzene	ma/Ka	8260B	1.57	8.02	35.4		<0.016	<0.014	<0.015	< 0.017	<0.018	<0.023	< 0.012	<0.012	<0.011	< 0.012	0.18
Hexachlorobutadiene	ma/Ka	8260B		1.63	7 19		<0.039	<0.035	<0.037	<0.041	<0.045	<0.057	<0.029	<0.029	<0.027	<0.028	<0.027
Isopromyl ether	malKa	8260B	-	2 260	2 260		<0.024	<0.022	<0.023	<0.025	<0.028	<0.035	<0.018	<0.018	<0.017	<0.018	<0.016
leannamhannana	melle	82600	1	2,200	200		<0.023	<0.020	<0.020	20.025	<0.020	<0.040	<0.010	-0.010	<0.004	<0.010	-0.010
Isopropyidenzene	ilig/Kg	0200B	0.007	200	200		-0.033	0.030	<0.032 +0.032	10.000	10.030	0.049	<0.025	-0.025	-0.024	NU.U24	10.023
Meany telt-Duty ether	mg/Kg	820UB	0.027	03.0	202		<0.034	<0.031	<0.033	<u.u3b< td=""><td><u.u39< td=""><td>&lt;0.050</td><td>&lt;0.026</td><td><u.u20< td=""><td><u.u24< td=""><td><u.u20< td=""><td><u.u23< td=""></u.u23<></td></u.u20<></td></u.u24<></td></u.u20<></td></u.u39<></td></u.u3b<>	<u.u39< td=""><td>&lt;0.050</td><td>&lt;0.026</td><td><u.u20< td=""><td><u.u24< td=""><td><u.u20< td=""><td><u.u23< td=""></u.u23<></td></u.u20<></td></u.u24<></td></u.u20<></td></u.u39<>	<0.050	<0.026	<u.u20< td=""><td><u.u24< td=""><td><u.u20< td=""><td><u.u23< td=""></u.u23<></td></u.u20<></td></u.u24<></td></u.u20<>	<u.u24< td=""><td><u.u20< td=""><td><u.u23< td=""></u.u23<></td></u.u20<></td></u.u24<>	<u.u20< td=""><td><u.u23< td=""></u.u23<></td></u.u20<>	<u.u23< td=""></u.u23<>
Methylene Chloride	mg/Kg	8260B	0.0026	61.8	1,150		<0.14	<0.13	<0.14	<0.15	<0.16	<0.21	<0.11	<0.11	<0.10	<0.10	<0.097
Naphthalene	mg/Kg	8260B	0.658182	5.52	24.10		< 0.029	<0.026	<0.028	< 0.031	<0.033	<0.043	< 0.022	<0.022	<0.021	< 0.021	0.25
n-Butylbenzene	mg/Kg	8260B		108	108		<0.034	<0.031	<0.032	<0.036	<0.039	<0.049	0.050 J	<0.025	<0.024	< 0.025	0.10
N-Propylbenzene	mg/Kg	8260B		264	264		< 0.036	< 0.033	<0.035	< 0.038	< 0.041	<0.053	<0.027	<0.027	<0.025	< 0.026	0.050 J
p-Isopropyltoluene	mg/Kg	8260B		162	162		<0.032	<0.029	<0.030	< 0.033	<0.036	<0.046	<0.024	<0.023	<0.022	<0.023	<0.022
sec-Butylbenzene	mg/Kg	8260B		145	145		<0.035	<0.031	< 0.033	< 0.037	<0.040	<0.051	0.063 J	<0.026	< 0.024	< 0.025	<0.024
Styrene	mg/Kg	8260B	0.22	867	867		< 0.034	< 0.030	<0.032	< 0.036	< 0.039	<0.049	< 0.025	<0.025	<0.024	< 0.025	0.078
tert-Butylbenzene	mg/Kg	8260B		183	183		<0.035	<0.031	<0.033	< 0.037	<0.040	<0.051	<0.026	<0.026	<0.024	< 0.025	<0.024
Tetrachloroethene	ma/Ka	8260B	0.0045	33	145		<0.032	< 0.029	< 0.031	< 0.034	<0.037	<0.047	0.12	< 0.024	<0.023	< 0.024	<0.022
Toluene	mo/Kn	8260B	1,1072	818	818		<0.013	<0.012	<0.012	<0.014	<0.015	<0.019	<0.0096	<0,0095	<0,0090	<0,0094	0.32
trans_1 2-Dichloroethene	malKa	8260B	0.0626	1560	1850	-	<0.030	<0.028	<0.029	<0.032	<0.035	<0.045	<0.023	<0.023	<0.022	<0.022	<0.021
trans 1.2 Dichloropropage	malKa	8260B	0.0020	1.510	1,510		<0.030	<0.020	<0.020	<0.032	<0.035	<0.045	<0.023	<0.023	<0.022	<0.022	<0.021
Trishless share	mg/Kg	0200D	0.0026	1,310	1,010		×0.032	×0.023	<0.030	×0.035	10.030	10.040	NU.U24	×0.023	10.022	<0.023	<0.0008
munioroethene	mg/Kg	820UB	0.0036	1.3	8.41		<0.014	<0.013	<0.014	<0.015	<0.010	<0.021	0.013 J	<0.011	<0.010	<0.010	<0.0098
i noniorottuoromethane	mg/Kg	8260B		1,230	1,230		<0.037	<0.034	<0.036	<0.039	<0.043	<0.055	<0.028	<0.028	<u.026< td=""><td>&lt;0.027</td><td>&lt;0.025</td></u.026<>	<0.027	<0.025
Vinyl chloride	mg/Kg	8260B	0.0001	0.067	2.08		<0.023	<0.021	<0.022	<0.024	<0.026	<0.033	<0.017	<0.017	<0.016	<0.017	<0.016
Xylenes, Total	mg/Kg	8260B	3.96	1,212	1212		<0.019	< 0.017	< 0.018	< 0.020	< 0.022	<0.028	< 0.014	<0.014	<0.014	< 0.014	0.73



#### TABLE 3 MARCH 2021 SOIL ANALYTICAL RESULTS WEST BLOCK COMMUNITY WITHIN THE CORRIDOR LIMITED PARTNERSHIP - MILWAUKEE, WI

										r			r			r	r
Sample							B-1	B-2	B-3	B-4	B-5	B-6	WB-SS-2	WB-SS-6	WB-SS-8	WB-SS-12	WB-SS-14
Depth (feet)							5.5-7.5	4-6	4-6	4-6	3-5	3-5	0-1	0-1	0-1	0-1	0-1
Soil Type	Linite	Mathead	NR 720 RCLs for GW	NR 720 RCLs - Non- Industrial Line for Direct	NR 720 RCLs - Industrial	Background	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY	CLAY	Sandy CLAY	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY	Silty CLAY
Soil Conditions	Units	Method	Protection (1)	Contact Protection (1)	Protection (1)	Value	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Unsaturated	Moist	Unstaturated	Unsaturated	Unsaturated	Unsaturated
Sampling Location	1						Exterior	Exterior	Exterior	Exterior	Exterior	Exterior	Interior	Interior	Interior	Interior	Interior
Sampling Date							4/10/2020	4/10/2020	4/10/2020	4/10/2020	4/10/2020	4/10/2020	3/1/2021	3/1/2021	3/1/2021	3/1/2021	3/1/2021
Polycyclic Aromatic Hydrocarbons (	PAHs)																
1-Methylnaphthalene	mg/Kg	8270D		17.6	72.7		< 0.0091	<0.0092	<0.0092	< 0.0091	<0.0093	< 0.0090					
2-Methylnaphthalene	mg/Kg	8270D		239	3010		< 0.0069	<0.0069	<0.0069	< 0.0069	<0.0070	< 0.0068					
Acenaphthene	mg/Kg	8270D		3590	45,200		<0.0067	<0.0068	< 0.0068	< 0.0067	<0.0068	<0.0066					
Acenaphthylene	mg/Kg	8270D					< 0.0049	<0.0050	< 0.0050	< 0.0049	<0.0050	< 0.0048					
Anthracene	mg/Kg	8270D	196.9492	17,900	100,000		< 0.0063	< 0.0063	<0.0063	< 0.0063	< 0.0064	< 0.0061					
Benzo[a]anthracene	mg/Kg	8270D		1.14	21		<0.0050	<0.0051	< 0.0051	<0.0050	< 0.0051	< 0.0049					
Benzo[a]pyrene	mg/Kg	8270D	0.47	0.115	2.11		<0.0072	<0.0073	<0.0073	<0.0072	< 0.0074	<0.0071					
Benzo[b]fluoranthene	mg/Kg	8270D	0.4781	1.15	21.1		<0.0081	<0.0081	<0.0081	0.0090 J	<0.0082	< 0.0079					
Benzo[g,h,i]perylene	mg/Kg	8270D					< 0.012	<0.012	<0.012	< 0.012	<0.012	<0.012					
Benzo[k]fluoranthene	mg/Kg	8270D		11.5	211		<0.011	<0.011	<0.011	<0.011	<0.011	<0.011					
Chrysene	mg/Kg	8270D	0.1442	115	2110		<0.010	<0.010	<0.010	<0.010	<0.010	<0.010					
Dibenz(a,h)anthracene	mg/Kg	8270D		0.115	2		< 0.0072	< 0.0073	< 0.0073	<0.0072	<0.0074	< 0.0071					
Fluoranthene	mg/Kg	8270D	88.8778	2390	30,100		< 0.0069	<0.0070	<0.0070	< 0.0069	<0.0071	<0.0068					
Fluorene	mg/Kg	8270D	14.8299	2390	30,100		<0.0053	<0.0053	<0.0053	<0.0053	<0.0053	<0.0052					
Indeno[1,2,3-cd]pyrene	mg/Kg	8270D		1.15	21.1		< 0.0097	< 0.0097	<0.0097	<0.0097	<0.0099	< 0.0095					
Naphthalene	mg/Kg	8270D	0.6582	5.52	24.1		<0.0058	<0.0058	< 0.0058	0.0061 J	<0.0059	< 0.0057					
Phenanthrene	mg/Kg	8270D					<0.0052	<0.0052	< 0.0052	0.0089 J	<0.0053	< 0.0051					
Pyrene	mg/Kg	8270D	54.5455	1790	22,600		<0.0074	<0.0075	< 0.0075	0.0092 J	<0.0076	<0.0073					
Polychlorinated Biphenyls (PCBs)			1		· · · ·		-		-		r			· · · · · ·	·		
PCB-1016	mg/Kg	8082A	0.0094***	4.11	28		-	-	-		< 0.0067	-		<0.019	-		<0.12
PCB-1221	mg/Kg	8082A	0.0094***	0.213	0.883		-	-	-		< 0.0084	-		<0.023	-		<0.16
PCB-1232	mg/Kg	8082A	0.0094***	0.190	0.792		-		-		<0.0083			<0.023			<0.15
PCB-1242	mg/Kg	8082A	0.0094***	0.235	0.972		-		-		< 0.0062	-		<0.017			<0.12
PCB-1248	mg/Kg	8082A	0.0094***	0.236	0.975						<0.0075			<0.021			<0.14
PCB-1254	mg/Kg	8082A	0.0094***	0.239	0.988						<0.0041			0.014 J			2.7
PCB-1260	mg/Kg	8082A	0.0094***	0.243	1.000						<0.0093			<0.026			<0.17
RCRA Metals							-							1	1		
Arsenic	mg/Kg	6010B	0.584	0.6/7	3	8.3	5	1.1	4.6	3.5	5.2	4.4					
Banum	mg/Kg	6U10B	164.8	15,300	100,000	364	42 V	50	29	32	39	36					
Cadmium	mg/Kg	6010B	U.752	/1.1	985	1	U.19 B	U.40 B	U.28 B	U.23 B	U.25 B	U.26 B					
Unromium	mg/Kg	0010B	300,000*			44	15	18	13	12	15	15					
Leao	mg/Kg	0010B	27	400	800	51.6	9.3	22	12	8.2	9.7	9					
Mercury	mg/Kg	/4/1A	0.208	3.13	3.13		0.019	0.018	U.U15 J	0.012 J	0.013 J	0.011 J					
Selenium	mg/Kg	0010B	U.52	391	384U		<u.5 <="" td=""><td>&lt;0.64</td><td>&lt;0.60</td><td>&lt;0.60</td><td>&lt;0.59</td><td><u.58< td=""><td></td><td></td><td></td><td></td><td></td></u.58<></td></u.5>	<0.64	<0.60	<0.60	<0.59	<u.58< td=""><td></td><td></td><td></td><td></td><td></td></u.58<>					
SIVER	mg/Kg	6010B	0.8491	391	5840		U.27 J	U.24 J	0.23 J	0.19 J	0.24 J	0.23 J					

(1) from VDNR RCLs Worksheet dated December 2018 BOLD induse sceee Groundwater Protection, Non-Moduli all Direct Contact, or industrial Direct-Contact RCL — Not analyzed, the excludined databatics P1 - Markin cybes (ND) addrs manual cybes adjointed in the network databation limit and the concentration is an approximate value P1 - Markin cybes (ND) addrs manual cybes adjointed NDN) incovery accessed control limits. P1 - Markin cybes (ND) addrs manual cybes adjointed NDN) incovery accessed control limits. P1 - Markin cybes (ND) addrs manual cybes adjointed NDN) incovery accessed control limits. P1 - Boxah lise Start here providing INIT based that any cybes adjointed angle P1 - Control of the Cont



APPENDIX



## APPENDIX A

WDNR Responsible Party Letter



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



March 29, 2021

Shane LaFave Community Within the Corridor Limited Partnership 110 Cheshire Lane, Suite 120 Minnetonka, MN 55305

> Subject: Reported Contamination at Community Within the Corridor – West Block, 3212 W Center St., 2727 N 32<sup>nd</sup> St., & 2758 N 33<sup>rd</sup> St., Milwaukee, WI DNR BRRTS Activity # 02-41-587376 DNR FID # 341333190

Dear Mr. LaFave:

On March 25, 2021, Robert Reineke of K. Singh & Associates, Inc., on behalf of Community Within the Corridor Limited Partnership, notified the Wisconsin Department of Natural Resources (DNR) that soil contamination and sub-slab vapor contamination were detected at the site described above.

Information submitted to the DNR regarding this site indicates Community Within the Corridor Limited Partnership is responsible for the discharge of a hazardous substance or other environmental pollution (hereafter referred to as "contamination") at the above-described site. "Site" refers to the property where the contamination occurred and any other property it has migrated to, as defined in Wisconsin Administrative Code ("Wis. Admin. Code") § NR 700.03 (56).

This letter explains how to initiate the investigation and cleanup of contamination of the site, and how to access further information and assistance from the DNR. The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs to investigate and clean up the contamination.

#### Legal Responsibilities:

Persons meeting the definition of "responsible party" under Wis. Admin. Code § NR 700.03 (51) must follow applicable law to address the discharge of a hazardous substance to the environment or other environmental pollution. Wisconsin Statutes ("Wis. Stat.") ch. 292 and Wis. Admin. Code chs. NR 700-799 provide specific requirements for undertaking appropriate response actions to address contamination, including requirements for emergency and interim actions, public information, site investigations, remedy selection, design and operation of remedial action systems, and case closure.

#### Special Vapor Intrusion Concern with Trichloroethylene:

Contamination that includes trichloroethylene ("TCE"), a chlorinated solvent and common degreaser, is of special concern from a human health perspective due to its potential for acute (short-term) health risks at relatively low concentrations in air. TCE is also a breakdown product of tetrachloroethylene

### VIA EMAIL ONLY

("PCE," also known as "Perc"), a historically common dry-cleaning chemical. Vapors can travel from contaminated soil or groundwater and along preferential pathways, such as <u>within</u> sewer lines, and enter occupied buildings. This is known as vapor intrusion (VI). Screening for VI must be conducted at every contaminated site in Wisconsin, as defined in Wis. Admin. Code § 716.11 (5) (a). **However, when TCE is present, screening for VI should be made a priority and an interim action under Wis. Admin. Code § NR 708.11 may be necessary.** For an overview on VI, see *What is Vapor Intrusion?* (RR-892). For more information, go to dnr.wi.gov and search "vapor." Additional technical guidance on VI is available in *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin,* (RR-800).

#### **General Recommendations for Responsible Parties:**

The DNR recommends that you:

#### 1. Hire a Qualified Environmental Consultant

To ensure response actions you plan to undertake comply with Wisconsin law, you should hire an environmental consultant within **30 days**, by April 28, 2021, to meet the regulatory deadlines listed below. A delay in hiring an environmental consultant could result in you missing key submittal deadlines.

Hiring a consulting firm with staff that have the appropriate state of Wisconsin qualifications to supervise and certify the submittals is a critical component and necessary to meet your requirements. Further, an environmental consultant should be knowledgeable of Wisconsin's technical procedures and laws, and be able to answer questions regarding cleanup requirements. Required qualifications for environmental consultants are specified in Wis. Admin. Code ch. NR 712. See *Wis. Admin. Code ch. NR 712 Qualifications and Certifications* (RR-081), for more information.

#### 2. Properly Submit Reports on Time with Required Information Included

Wisconsin law includes timeframes for submitting technical documents and conducting work, as well as specifications for what should be included in those submittals. This letter provides a general overview of the timeframes and first steps to take for site investigation and cleanup. For an overview of timing requirements, please refer to *NR 700 Process and Timeline Overview* (RR-967), enclosed.

The DNR developed the publication *Guidance for Electronic Submittals for the Remediation and Redevelopment Program* (RR-690), to assist responsible parties and consultants in properly submitting documents. Wis. Admin. Code § NR 700.11 (3g), and other specific provisions within Wis. Admin. Code ch. NR 700, outline the requirements for submittals, including electronic submittals.

#### 3. Consider the Benefits of a Fee-based Technical Review of your Submittals

In-depth DNR review of technical reports and submittals is available for a fee. The Remediation and Redevelopment (RR) Program project managers are available throughout the process to answer general questions and provide general input as the site moves toward case closure. However, if you want a formal, written response from the DNR, a meeting with the DNR or both on a specific submittal, a review fee will be required in accordance with Wis. Admin. Code ch. NR 749. **Obtaining technical assistance from DNR project managers throughout the process is an effective way to prevent problems and delays at the end of the process when case closure is requested.** Forms, a fee schedule and further information on technical assistance is available at dnr.wi.gov by searching "brownfield fees."

#### Required Steps to Take and Documents to Submit:

The steps listed below serve as a general overview only — all mandatory steps and submittals specified in Wis. Admin. Code, chs. NR 700-799 must be met before the DNR can grant case closure, which is a determination by the DNR that no further cleanup is necessary at a site, as defined in Wis. Admin. Code § NR 700.03 (3m).

 Scoping and Work Plan Submittal – NR 716.07 and 716.09: The law requires that you appropriately scope your site investigation and submit a work plan within 60 days of this notification, by May 28, 2021, for completing a site investigation. The work plan must comply with the requirements in Wis. Admin. Code, chs. NR 700-799. For additional assistance, the DNR has extensive guidance on its website at dnr.wi.gov, search "site investigation scoping."

Per Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, site investigation scoping and work plans should include an evaluation of the history of the site or facility, including industrial, commercial or other land uses that may have been associated with one or more hazardous substance discharges at the facility. In addition, an evaluation of the history of previous hazardous substance discharges or environmental pollution, the location of the site or facility, and its proximity to other sources of contamination must be included. Site investigation work plans should also include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07. Emerging contaminants discharged to the environment, including perfluoroalkyl and polyfluoroalkyl substances (PFAS) and 1,4-dioxane, meet the definition of a hazardous substance or environmental pollution under Wis. Stat. § 292.01 and must be considered during site investigation scoping.

Prior to and during a site investigation, you must evaluate whether any interim actions are needed to contain or stabilize a hazardous substance discharge or environmental pollution, pursuant to Wis. Admin. Code § NR 708.11. If you undertake an interim action (*e.g.*, free product removal), you must submit documentation of the action per Wis. Admin. Code § NR 708.15.

As you develop the site investigation work plan, you must include an assessment of the vapor intrusion pathway. Wis. Admin. Code § NR 716.11 (5) outlines the requirements for when to evaluate for the presence of vapors in the sub-surface and in indoor air. The results and conclusions from the vapor assessment must be included in the Wis. Admin. Code § NR 716.15 site investigation report whether or not you elected to take vapor samples. *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin* (RR-800), is available to help responsible parties and their consultants comply with these requirements.

- 2. <u>Field Investigation NR 716.11</u>: Following submission of the work plan, the site investigation must be started within the timeframe provided under law. The timeframe varies depending on whether you are requesting the DNR's fee-based review of the work plan. If you do not request a fee-based review of the work plan, you must initiate the field investigation within 90 days of submitting the work plan, and you may proceed with the field investigation upon DNR notification to proceed; however, if the DNR has not responded within 30 days from submittal of the work plan, you may then proceed with the field investigation. If a fee and request for DNR review of the work plan is submitted, the field investigation must begin within 60 days after receiving DNR approval.
- Sample Results Notification Requirements NR 716.14: You must report sampling results to the DNR, owners, occupants and various other parties within 10 business days after receiving the sampling results, unless a different timeframe is approved by the DNR, in accordance with Wis. Admin. Code § NR 716.14.

- 4. <u>Site Investigation Report NR 716.15</u>: Within 60 days after completion of the field investigation and receipt of the laboratory data, the law requires you to submit a Site Investigation Report (SIR) to the DNR. As part of the SIR or in the Remedial Actions Options Report (RAOR), if there is soil contamination, the responsible party shall identify the current land use (*i.e.*, industrial or non-industrial) and zoning for the site or facility in accordance with Wis. Admin. Code § NR 720.05 (5). Also, as part of the SIR or in the RAOR, you must include any interim action report that may be required under Wis. Admin. Code § NR 708.15.
- <u>Remedial Actions Options Report NR 722</u>: Within 60 days after submitting the SIR, the law requires you to submit a RAOR. The selected remedy in the RAOR should include an evaluation of green and sustainable remediation criteria, as appropriate, as required by Wis. Admin. Code § NR 722.09 (2m). This may be submitted as part of a broader SIR.
- Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Reports – NR 724: Unless otherwise directed by the DNR, the responsible party shall submit all plans and reports required by Wis. Admin. Code ch. NR 724.
- Notification of Residual Contamination or Continuing Obligations NR 725: In situations where notification is required, the responsible party must provide a submittal(s) that confirms that continuing obligations have been identified and affected property owners have been notified by the responsible parties 30 days prior to case closure, as required by Wis. Admin. Code ch. NR 725 and § NR 726.13 (1) (d).
- 8. <u>Semi-Annual Reporting NR 700.11</u>: Wis. Admin. Code § NR 700.11 (1) (a) requires responsible parties to submit semi-annual site progress reports to the DNR until case closure is granted. The reports summarize the work completed over six months and additional work planned to adequately complete the response action at the site. Consultants may submit these reports on behalf of responsible parties. These reports are due in January and July of each year. Please refer to DNR publication *NR 700 Semi-Annual Site Progress Report* (RR-082), for more information.

#### Submittals required under Wis. Admin. Code chs. NR 700-799

These documents, as applicable, must be submitted to the DNR prior to the responsible party requesting case closure, unless otherwise directed by the DNR:

- □ Ch. NR 708 reports and documentation for any immediate or interim actions.
- □ Ch. NR 712 professional certifications and signatures are included with applicable submittals.
- □ Ch. NR 716 work plan(s) and site investigation report.
- □ Ch. NR 722 remedial action options report (exception is for Dry Cleaners Environmental Response Fund sites), with the selected remedial action identified.
- □ Ch. NR 724 design, construction documentation, operation, maintenance and monitoring plans and reports, including vapor mitigation commissioning.
- □ Ch. NR 725 submittal(s) that confirms that continuing obligations have been identified and affected property owners have been notified by the responsible parties 30 days prior to requesting case closure.
- □ If requesting case closure, the Ch. NR 726 case closure form and documentation substantiating compliance with the NR 700 rule series.
- □ Ch. NR 749 fees have been paid, as applicable, including closure and database fees.
- □ Ch. NR 700 semi-annual site progress reports starting six months after notification.

#### Additional Information:

The DNR tracks information on all cleanup sites in a DNR database available at dnr.wi.gov, search "BOTW." The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this site is listed at the top of this letter. You may view information related to your site on this database at any time.

All correspondence regarding this site should be directed to:

Theadora Jorgensen Remediation and Redevelopment Program Wisconsin Department of Natural Resources 2300 N. Dr. Martin Luther King Dr. Milwaukee, WI 53212 theadora.jorgensen@wisconsin.gov

To speed up processing, your correspondence should reference the BRRTS and Facility Identification (FID) numbers (if assigned) listed at the top of this letter.

Submittals required under the NR 700 rule series should be sent to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (<u>https://dnr.wi.gov/topic/Brownfields/Submittal.html</u>). Questions on using this portal can be directed to the contact below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (<u>https://dnr.wi.gov/topic/Brownfields/Contact.html</u>).

Please visit the DNR's Remediation and Redevelopment Program web page at dnr.wi.gov, search "Brownfields" for information on selecting a consultant, seeking financial assistance, and understanding the investigation and cleanup process. Information regarding review fees, liability clarification letters, post-cleanup liability and more is also available.

If you have questions, please call the DNR Project Manager Jane Pfeiffer at (414) 435-8021 or Program Associate Theadora Jorgensen at (414) 639-4188 for more information.

Thank you for your cooperation.

Sincerely,

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Theadora Jorgensen Environmental Program Associate Remediation & Redevelopment Program Southeast Region

#### Enclosures:

RR-967, *NR 700 Process and Timeline Overview* <u>https://dnr.wi.gov/files/PDF/pubs/rr/RR967.pdf</u>

RR-502, Selecting a Consultant http://dnr.wi.gov/files/PDF/pubs/rr/RR502.pdf

RR-024, *Environmental Services Contractor List* http://dnr.wi.gov/files/PDF/pubs/rr/RR024.pdf

RR-506, VPLE Fact Sheet #2 http://dnr.wi.gov/files/PDF/pubs/rr/RR506.pdf

RR-674, *Environmental Contamination Basics* http://dnr.wi.gov/files/PDF/pubs/rr/RR674.pdf

RR-082, *NR 700 Semi-Annual Site Progress Report* <u>https://dnr.wi.gov/files/PDF/pubs/rr/RR082.pdf</u>

RR-081, *Wis. Admin. Code ch. NR 712 Qualifications and Certifications* <u>https://dnr.wi.gov/files/PDF/pubs/rr/RR081.pdf</u>

Form 4400-237, *Technical Assistance and Environmental Liability Clarification Request* <u>http://intranet.dnr.state.wi.us/formscatalog/ffDispFormImage.aspx?FormID=943</u>

RR-892, What is Vapor Intrusion? https://dnr.wi.gov/files/pdf/pubs/rr/rr892.pdf

cc: Robert Reineke – K. Singh & Associates, Inc.