



October 24, 2016

Blaine Schroyer
Terracon Consultants, Inc
9856 South 57th Street
Franklin WI 53132

Subject: October 2016 Site Investigation Status Report and Remedial Action Plan: Keller Property/Proposed Tennyson Ridge Development, 1902 Tennyson Lane

Dear Mr. Schroyer:

The October 2016 report describes the known environmental conditions at the 1902 Tennyson Lane parcel as well as the planned redevelopment of the site. The parcel contains 10 buildings one of which housed a prion research laboratory. Initially the parcel was littered with a large volume of scrap and waste material. Much of this has been removed and the remaining environmental issues revolve around prions and petroleum related volatile organic chemicals.

Based on the 2005 site work there were seven former or current above and below ground storage tanks for fuel oil, diesel fuel, gasoline or unknown contents. Stained soil was also seen in several locations. In 2005 Liesch installed ten soil borings at various potential trouble spots. Subsequent to the 2005 study additional field work was conducted in 2013 and 2016. The results of that work showed:

Volatile Organic Chemicals: The 2005, 2013 and 2016 borings showed only a single exceedance of a non industrial direct contact guidance concentration for naphthalene in boring B5 in the northern portion of the site. The boring lies in an area of suspected soil contamination. In total there are four areas of limited soil contamination discovered at the site. Two of these areas lie beneath buildings. The extent of the soil contamination in these areas will be managed when the buildings are removed during site redevelopment.

Polychlorinated Biphenyls: There is limited concern for PCBs at the property. A soil sample is needed in an area of a pad mounted transformer near boring B-10 that was drained to the ground prior to removal. This field work is planned.

Metals: No site related metals were detected exceeding any soil direct contact related guidance criteria.

Groundwater: Given the limited soil contamination and the expected depth to groundwater, not encountered to a depth of 20 feet, groundwater samples were not collected at this time. However site soils are sandy and it is possible future site conditions may warrant groundwater sampling.

The Department believes this existing data adequately characterizes the environmental conditions at the site for redevelopment purposes.

The site is proposed to be redeveloped as multifamily housing. Consequently, direct contact and potential vapor issues need to be addressed in the materials management plan. The October report details a materials management plan. In brief the plan calls for:

The grading plan for the site includes the excavation and movement of about 40,000 cubic yards of soil. The bulk of this soil is expected to be clean material that can be reused on and off site with no restrictions. Soils that are visually impacted or read greater than 10 ppm on a field screening tool will be segregated and stockpiled before reuse. Some soil believed to be contaminated will be reused on site and placed in "vaults" at depths greater than 4 feet. These vaults are simple excavations below 4 feet that can be filled with contaminated soil then covered with 4 feet of clean soil. The expected depth to water makes this deeper placement possible. In general direct contact risks across the site will be addressed by soil, building or pavement caps.

Based on existing data it is estimated about 2500 cubic yards of contaminated soil will require some sort of response action. The proposed management plan has contingencies in place for additional soil sampling should heavier contaminated material be discovered. Soils too contaminated for onsite reuse will be taken off site for landfilling or other Department pre-approved disposal options. Section 5 of the report describes the details of the site management plan. As proposed Section 5 is acceptable to the Department.

The remaining sections of the report discuss the potential for uncovering new storage tanks and groundwater management should dewatering be necessary. The Department also agrees with these portions of the report.

Based on the data provided the Department approves the proposed materials management plan for the site. The plan should adequately address the environmental and health concerns associated with reusing the property as a multifamily housing development.

This completes the Department review of the October report. If you have any questions on this review please contact me directly at 608-275-3303.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Michael Schmoller". The signature is fluid and cursive, with a large initial "R" and "S".

R Michael Schmoller
Hydrogeologist