

February 10, 2022  
File No. 25222081.00

## MEMORANDUM

TO: Cindy Koepke, WDNR

FROM: Eric Oelkers

SUBJECT: Emerging Contaminants Statement – Hartmeyer Property  
BRRTS #02-13-580328

SCS Engineers (SCS) prepared this evaluation of emerging contaminants at the Hartmeyer Property (the Property) in support of discussions regarding the closure of the open environmental contamination case file (BRRTS #02-13-580328) for the Property. As described below, SCS did not find evidence to suggest that sources of PFAS or 1,4-dioxane are, or were, present on the Property.

General Engineering Corporation submitted a case closure request to the Wisconsin Department of Natural Resources on May 2019 following the removal of the one remaining 250,000-gallon above-ground heating oil storage tank (AST), excavation of associated petroleum-contaminated soil, and limited groundwater sampling. SCS understands that the case remains open following the submittal of additional soil sampling data from Phase 2 Environmental Site Assessment activities performed by Ramboll in April and September 2019.

The Property is located adjacent to the west side of the former Oscar Meyer (OM) plant that was owned and operated most recently by Kraft Heinz Foods Company (Kraft Heinz), primarily for the production of processed meats, until the plant closed in 2017. The Property is separated from the plant grounds by a railroad right-of-way. OM and successive owners/operators of the plant leased the Property from the Hartmeyer Estate. Kraft Heinz subsequently purchased the Property following the termination of the lease agreement in 2020.

Meat packing operations began at the Oscar Mayer site in 1916. Historical topographic maps indicate the railroad tracks existed prior to 1892 and that OM plant grounds and the Property were primarily wetlands prior to the development of the OM site for meat packing operations.

The earliest available aerial photograph of the Property, from 1937, shows that most of the Property was undeveloped, with the exception of the following:

- Structures that have been identified in various reports as a feed warehouse and tavern at the northeast corner of the Property, southwest of the intersection of Roth Street with the railroad tracks;
- Structures identified as a small slaughterhouse and storage shed on the east side of the Property along the railroad tracks, approximately 600 feet south of Roth Street; and



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- Structures that appear to be a farmhouse and barn near the railroad tracks on the west side of the Property, approximately 600 feet south of Roth Street.

The property usage appeared to be substantially the same as 1937 in aerial photographs from 1950, 1955, and 1957 with the exception that what appears to be a wet area is visible near the present pond on the northwestern portion of the Property. By the time of the 1968 photo, softball/baseball field are present in the northwest area of the Property, the farmhouse/barn, feed warehouse, and slaughterhouse structures are gone, and the 1959 livestock ramp has been constructed across the tracks just north of the former slaughter house. In addition, the 1968 photo shows a parking area at the northeast corner of the Property and possible coal pile south of the livestock ramp.

The 1974, 1975, 1976, and 1981 photos show an enlarged parking lot at the northeast corner (without the tavern), the new heating oil AST area along the railroad tracks, and an expanded (coal) pile between the AST area and the parking lot. By the time the 1986 and 1987 photos were taken, the livestock ramp and coal piles are gone. The outline of the current pond is visible in the 1986 photo but not in the 1987 photo. The 1995 and 2000 photos show some land disturbance in the former coal pile area and a small area of open water in the pond. By 2005 (and also in the 2010 and 2014 photos), the ball fields are fading away, the pond is more prominent, and the former coal pile area appears to be fully covered in vegetation. The 2017 and 2020 photos show that the ASTs have been removed, and the former AST area is covered in vegetation.

A Phase 1 Environmental Site Assessment (ESA) completed by ECS Midwest, LLC in 2021 did not identify other land uses on the Property other than those described above. The known or potential sources of contamination on the Property include:

- fill that may have been imported to reclaim wetlands prior to 1937;
- petroleum contamination from the former heating ASTs on the Property and a historical gasoline storage tank identified on fire insurance maps in the Roth Street right-of-way, adjacent to the Property, on the north side of the feed warehouse; and
- apparent coal storage on the eastern portion of the Property near the railroad tracks.

The aerial photos and available 1942, 1950, and 1986 fire insurance maps do not show evidence of manufacturing, dry cleaning, or disposal facilities on the Property. Based on the aerial photo history and fire insurance maps, there is no evidence or reason to suspect that PFAS-containing substances or chlorinated solvents such as 1,1,1-trichloroethane were used, stored, or otherwise deposited on the Property. None of the various Phase 1 ESAs completed for the adjacent OM plant property reviewed by SCS suggested other potential contamination sources on the Property. Based on the evidence discussed above, SCS does not believe that further evaluation of PFAS or 1,4-dioxane on the Property is necessary.

EO/lmh/RT

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