

Roy Irving, PhD.
Hazard Assessment Section Chief
Wisconsin Department of Health
1 West Wilson St
Madison WI 53703

Dear Dr. Irving,

I am writing on behalf of the residents of Sherman Neighborhood Association, residents that live in the Truax apartments, current residents as well as future residents yet to arrive to Madison's north side. Since early in 2017, area residents have been meeting and talking about the redevelopment of the Oscar Mayer property (about 72 acres). This land has over 100 years of highly industrial uses. While most folks who live in the area think of baloney and hot dogs from animals that were staged and slaughtered there by the thousands each day, it also produced plastics, pesticides, had refrigeration systems and large tanks of various volatile organic solvents and petroleum products, a waste water treatment plant, power plant, incinerator, and a small landfill.

It is due to these documented toxic chemical uses in an industrial setting, and their disposal over the course of decades, the subsurface and surface contamination and potential exposures via surface water (Starkweather Creek) and possibly in the basements of area homes, future Metro workers in on site buildings, and current tenants that we write.

We are worried.

Well over a thousand area residents have met since 2017 to discuss their hopes and concerns as it relates to the redevelopment of the Oscar Mayer property, now called O.M. Station, as well as the property located at 2007 Roth Street, known as the Hartmeyer Natural Area. Both properties are being considered for housing, both affordable and market rate, as well as community courtyards and commercial retail spaces. Right now, OM Station has offices rented and a local maker's group ("The Bodgery") currently housed in on site buildings that have not yet been tested for gas vapor infiltration.

We are asking for the assistance of your APPLE TREE grant staff to conduct a site health assessment on the now vacant Madison Oscar Mayer site. We have recently reviewed an [Environmental Site Assessment \(ESA\) Phase #1 report from May 2020](#) on the north lots of the site that are being considered for purchase by the city of Madison. Lot #2 contains two buildings currently under consideration for future use by Metro for a bus satellite facility in Building 43 and offices in Building 50. We have concerns related to extremely high levels of TCE found through subslab vapor testing from under building 43, up to 97,000 ug/m³. Recent SVE pilot tests showed results of up to 180,000 ug/m³ under Building 43. Building 50, located just next to Building 43, has not been tested for

any vapor infiltration and needs to have that completed. If Metro is moving its workforce to these buildings to offer better work conditions, as mentioned in its facility analysis, then before Metro union workers are assigned to work in that facility, we owe it to them to make sure these buildings and the grounds are safe. Building 50 is also documented as being used for plastics production. There is vinyl chloride documented as being found beneath building 50 in past investigations that has not been investigated or remediated.

Because this site is a filled historic wetland and marsh, it is our concern that these levels of contamination indicate a significant plume and with groundwater documented as moving to the south/southeast, it is a public health and safety risk to the homeowners who live downgradient in Eken Park. This plume has never been delineated vertically or horizontally.

Due to the large variety and high concentrations of volatile organic chemicals and their toxic nature as well as contaminants being found across all mediums at elevated levels, and at varying depths in the ground, we are concerned about exposure and the health and safety of the public and to our drinking water. Municipal Well 15 is already closed due to PFAS levels being very high. Oscar Mayer is within the wellhead protection zone for possible contamination contribution for Municipal Well 7, and documented in the wellhead protection report.

As buildings continue to be filled with office workers, and homes in Eken Park have basements full of groundwater on a regular basis, with sump pumps open to off-gassing, and most importantly being located down gradient of the Oscar Mayer site, we worry about exposure to area residents and worker health and safety. Nearby residents have expressed concerns because several of their neighbors have developed leukemia, with two dying recently. The Midwest Environmental Advocates did a document search and prepared a summary of the buried wastes, spills and other known contamination events on the site. Please review the data provided by [The Transparency Project](#) and the related [Map](#).

We have sent letters, shared site contamination data with the Mayor and Alders, and attended informational meetings, as the Oscar Mayer Special Area plan process has been underway. The plan has evolved, but we have been unsuccessful in obtaining responses to our many questions and concerns related to this large industrial urban site. It is considered a Brownfields project and it is within an Economic Opportunity Zone, which would also allow for US EPA funds towards a site investigation.

To date, as drilling has occurred on the OM Station site without worker protective gear, and area residents have expressed their concerns to the city environmental office, the Mayor and the Alders, the city's environmental representative, Brynn Bemis, but no action or concern has been shown for worker safety in our city. This has occurred repeatedly, with reports being made, without any concern for drillers working without

gear of any kind, drilling through ethylene dichloride on the site, among the many other chemicals yet to be documented through the site investigation work. It is this cavalier disregard for public and worker health and safety that is causing area residents to be concerned. As old buildings come down with redevelopment, how will asbestos removal be conducted in a residential area? There is a project on Huxley that will require asbestos removal. Again, public health and safety are a concern.

The Hartmeyer property also has known chemical contamination including petroleum related chemicals and surface soils with elevated levels of arsenic, again, due to the partial use of the property for industrial uses such as above ground storage tanks of fuel and large piles of coal for the power plant on Oscar Mayer. Meat processing required huge amounts of hot water and steam. The high capacity wells at Oscar Mayer were closed in the 1980s due to the water containing PCE and TCE and no longer considered safe for food production. The Hartmeyer site is in litigation currently for the clean up and related damages from previous industrial use. It is the preference of the neighborhoods that this property remain undeveloped for an open natural area and possible outdoor classroom and urban ecology center. Remediation of the site is one of the required outcomes from the lawsuit currently in Dane County courts.

The city has said in its racial equity and social justice tool related to the Oscar Mayer property, that often, long term outcomes "are not a focus or major factor in decision-making by the private sector." If this is the perspective of the city towards redevelopment of a highly contaminated site by the private sector, we rely upon your office to come forward to conduct the site investigation work that the city clearly does not expect the owners to conduct, nor to conduct itself prior to purchasing the land located at the north end of the site. No phase II ESA is planned before the land is purchased.

We would greatly appreciate your assistance in conducting a Site Health Assessment on the Oscar Mayer site so we can learn more about the current and future site activities and how contaminants on and off the Oscar Mayer site might affect area neighborhood and wildlife exposures to toxic chemicals. We would like to receive assurances that no exposures of concern will or have occurred.

Sincerely,

Sherman Neighborhood Association
Renee Walk & Lesleigh Luttrell, Co-Chairs