December 7, 2022
File No. 25222081.00

Madison Plan Commission
210 Martin Luther King, Jr., Blvd.
Madison, WI 53703

Subject: Status of Environmental Issues
Proposed Hartmeyer Property Development, 2007 Roth Street, Madison

Dear Plan Commission Members:

SCS Engineers (SCS) has prepared this summary of environmental issues in support of the proposed development of the eastern portion of the Hartmeyer Property, 2007 Roth Street, Madison, on behalf of Lincoln Avenue Capital (LAC).

Site History

The Hartmeyer property, parcel number 08103130099, was owned by successors to the Hartmeyer Estate until Kraft Heinz purchased it in 2020. Kraft Heinz and Oscar Mayer leased the property for many years prior to the recent purchase. **Based on a historical review, SCS is not aware of any evidence that Kraft Heinz or Oscar Mayer performed manufacturing operations on the Hartmeyer Property.**

Aerial photographs dating back to 1937 show that the parcel has remained largely undeveloped since that time, with a few small buildings located around the perimeter of the property. Since sometime after 1955, Oscar Mayer and/or Kraft Heinz used the eastern portion of the property for employee parking and storage of coal and heating oil. The coal pile was removed prior to 2000 and the last of the heating oil storage tanks was removed in 2016. The property is currently vacant with the exception of the paved parking lot and a small brick "gas house" for the natural gas supply to the 910 Mayer Avenue property (former Oscar Mayer plant).

Wisconsin Department of Natural Resources (WDNR) Cases

There are two WDNR environmental cases identified on the property summarized below.

Case 03-13-000053 is a closed file related to a fuel spill from underground piping associated with the fuel oil aboveground storage tanks in 1989. The WDNR closed the case in 2008 with petroleum constituents remaining in soil and groundwater after a series of investigation and oil recovery activities. The continuing obligations (requirements) set forth in the WDNR case closure letter include proper management of impacted soil, if excavated, and specific approval to construct a water supply well on the property.

Case 03-13-580328 was opened in response to the discovery of additional petroleum impacts below the last aboveground storage tank when the tank was removed in 2016. Investigation and remediation to address the identified petroleum impacts were completed in 2019; however, the case remains open following the discovery of shallow soil impacts during a recent environmental

assessment performed by Kraft Heinz. WDNR has indicated that additional investigation is not required, but direct contact concerns related to the soil must be addressed prior to case closure.

Residual Contamination

The soil contaminants on the property in the proposed development area that exceed one or more WDNR standards for residential sites are petroleum-related volatile organic compounds (PVOCs), polycyclic aromatic hydrocarbons (PAHs), and metals (primarily arsenic).

The groundwater contaminants detected at concentrations greater than applicable WDNR standards are PVOCs. Recent groundwater sampling and analysis for the list of 60 VOCs at seven locations across the property detected low concentrations of PVOCs near the former fuel oil storage tanks and associated piping, but did not detect VOC concentrations greater than WDNR groundwater standards.

The contaminants on the property are attributable to historical heating oil and coal storage on the property as well as historical fill soil that likely contains (coal) combustion residues. **The concentrations of contaminants remaining on the property are similar to those remaining on many other recent successful residential redevelopment sites on previously filled portions of the isthmus, including East Washington Avenue and other areas on the near east side of Madison.**

Impacted soil excavated for the development project will be handled according to WDNR regulations and approvals, and most or all excavated soil will be disposed off site in a licensed solid waste landfill.

At the completion of construction, the entire development site will effectively be capped with building floor slabs, concrete/asphalt pavements, pond liners, or at least 1 foot of clean soil.

Investigation of the site has shown that there is minimal risk of volatile vapor intrusion into buildings, based on WDNR vapor intrusion guidance. However, as an additional protective measure, a continuous vapor barrier and vapor extraction piping will be placed below the buildings' ground floor slabs to prevent soil vapors from entering the occupied spaces of the buildings.

Regulatory Oversight

LAC and SCS met with WDNR Remediation and Redevelopment Team members on February 22, 2022, to discuss the proposed development of the property for *residential* use and have remained in communication with WDNR since that time. **WDNR has agreed that no additional investigation in the proposed development area is necessary and that capping is an appropriate approach for closure of the open contamination case file.**

On behalf of LAC, SCS will prepare and submit a Material Management Plan (MMP) for WDNR review and approval prior to the start of construction work. The MMP describes how impacted soil and groundwater will be managed during construction and how the building occupants and general public will be protected from residual contamination after the project is completed.

Following construction we will submit a report to WDNR documenting the proper disposal of impacted soil and groundwater and the site features and controls that will be maintained to prevent contact with residual contamination. Based on this report, the WDNR will close the open case file

(03-13-000053) with continuing obligations for maintenance of the protective features, which will be recorded on the online registry of contaminated sites.

Please do not hesitate to contact us if you have any questions regarding the status of environmental work at this property.

Sincerely,

Ray Tierney, PG
Vice President
SCS Engineers

Eric Oelkers, PG
Senior Project Manager
SCS Engineers

EO/jsn/REL/RT

cc: Kevin McDonell, Lincoln Avenue Capital
Cindy Koepke, Wisconsin Department of Natural Resources
Brynn Bemis, City of Madison Engineering Division

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