



CITY OF MANITOWOC
WISCONSIN, USA
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September 27, 2016

Peter Ramanauskas
EPA Region 5 PCB Coordinator
US EPA Region 5
77 W Jackson Blvd
Chicago, IL 60604

RE: Request for PCB Discharge Cleanup Site Coordinated Approval in Wisconsin

Dear Mr. Ramanauskas,

The City of Manitowoc is requesting a TSCA coordinated approval, to be led by WDNR, in accordance with the One Cleanup Program Memorandum of Agreement between USEPA and WDNR for a Type C site classification. The following provides a summary of the project and our certification statement.

1. Site Information

Site Name	Former Mirro Plant #9 Manufacturing Facility (aka <i>Mirro Plt#9; Mirro-Spirtas; Mirro Facility; 1512 Washington Street</i>)
Site Address	1512 Washington Street, Manitowoc, Wisconsin
WDNR Contact	Tauren R. Beggs Wisconsin Department of Natural Resources Remediation and Redevelopment Program 2984 Shawano Ave Green Bay, WI 54313 Phone: (920) 662-5178 Tauren.Beggs@wisconsin.gov
USEPA Brownfields Project Manager	Jon Peterson USEPA, Region 5 77 West Jackson Boulevard (Mail Code SE-7) Chicago, Illinois 60604-3507 peterson.jon@epa.gov

BRRTS Project Numbers	<p>Open ERP Case: 02-36-545108 MIRRO-SPIRTAS</p> <p><i>Additional BRRTS case numbers include:</i> 02-36-216391 MIRRO PLT #9 - WEST SIDE (Closed ERP) 07-36-548528 MIRRO FACILITY (FORMER) (General Property) 03-36-000085 MIRRO PLT #9 (EAST SIDE) (Closed LUST) 03-36-274209 MIRRO PLT #9 (Closed LUST) 04-36-049803 1512 WASHINGTON (Closed Spill) 04-36-223347 MIRRO PLT #9 (Closed Spill) 04-36-046037 1512 WASHINGTON ST [HISTORIC SPILL]</p>
RP Contact	<p>Nicolas Sparacio Executive Director Community Development Authority of the City of Manitowoc 900 Quay Street Manitowoc, WI 54220-4543 (920)686-6931 nsparacio@manitowoc.org</p>
Environmental Consultant	<p>Harris Byers Brownfields Project Manager Stantec 12075 Corporate Parkway Suite 200 Mequon, WI 53092-2649 (262) 643-9174 Harris.Byers@stantec.com</p>

2. Status of Site Investigation and Cleanup

Prior Work. Multiple phases of due diligence and abatement/removal have occurred at the Site. A Phase I ESA was completed on behalf of the current owner (the Community Development Authority of the City of Manitowoc) on June 28, 2016 by Stantec utilizing USEPA Brownfield Assessment grant funding provided to the City of Manitowoc. The Stantec (2016a) Phase I ESA provides a summary of the following reports, which document residual hazardous substance and petroleum impacts (including PCBs) to Site soil/groundwater/building materials:

- AECOM, 2009a, Phase I Environmental Site Assessment, January 19, 2009.
- AECOM, 2009b, Phase II Subsurface Assessment, June 4, 2009.
- AES, Inc., 2011, Targeted Brownfields Assessment, March 2011.
- ES&T, 2005, Phase II Environmental Site Assessment, March 10, 2005.
- Legend Technical Services, 2008, Limited Asbestos Visual Inspection Survey Report, July 29, 2009.
- OTIE, 2011, Site Assessment Report, March 15, 2011.
- Stantec, 2016, Property Specific Determination of Eligibility Request, June 14, 2016.
- STN Environmental JV, 2009, Presentation of Building Inspection Results, December 23, 2009.
- STS, 2003, Phase I Environmental Site Assessment, June 20, 2003.
- Symbiont, 2015, PCB Contaminated Concrete Sampling and Unlabeled Drum Characterization Results, May 13, 2015.
- USEPA, 2011, Pollution/Situation Report #2, September 29, 2011.

- WDNR, 2016, Clarification of the Local Government Unit Liability Exemption Related to the Potential Acquisition of the Former Mirro Plant #9, March 8, 2016.

With respect to PCBs, soil sampling initially documented PCB concentrations greater than 50 parts per million, which triggered a notification from WDNR to USEPA under Wisconsin's One Cleanup Program Memorandum of Agreement (OCP MOA) with USEPA. WDNR worked with USEPA to manage, clean up, and dispose of PCB wastes regulated under 40 Code of Federal Regulations 761. The containerized PCB oils were properly handled and disposed of in October 2009 and the case was closed (WDNR, 2016).

WDNR received USEPA assistance for a time-critical removal action at the Property to address the immediate threat posed by the PCB transformer oil drained from two on-site transformers, investigate potential environmental discharges resulting from missing PCB oil, and to identify potential responsible parties. The TBA was completed in March 2011 and USEPA assessed the Property to evaluate the need for supplemental removal actions. USEPA approved the request for a time-critical supplemental removal action in April 2011.

During enforcement negotiations with USEPA in March 2011, EJ Spirtas (prior site owner) agreed to conduct a voluntary cleanup with USEPA oversight to address the threats identified in USEPA's site assessment. The cleanup was to be completed in two phases:

- 1) Address immediate threats, including removal of hazardous waste, eliminating direct contact risks, and reducing the threat of off-site discharges through the sewers.
- 2) Demolish the existing buildings and properly dispose of remaining PCB contaminated building materials as required by TSCA.

EJ Spirtas hired EQ to conduct phase one of the agreed-upon cleanup action in July 2011. Work completed reportedly included:

- Draining and cleaning of transformers
- Contaminated concrete floors cleaned and marked for proper disposal during phase two
- Proper disposal of PCB-contaminated liquids (oil and wash water) and solids (wood flooring, debris, and containers)
- Wipe sampling of the loading dock floor
- Loading dock drain sampled, cleaned, and plugged
- Mercury switches throughout the facility collected

As noted in the final Pollution/Situation Report, USEPA (2011) considered Phase I of the removal action complete. Per WDNR's request, USEPA returned oversight for phase two of the removal action at the Property to WDNR in 2013 to facilitate the provision of Brownfields financial assistance. Supplemental concrete sampling was completed by Symbiont in Feb/March 2015, and residual concentrations of Aroclor 1260 in concrete cores ranged from 11,000 to 79,000 milligrams per kilogram. Therefore, WDNR (2016) noted the concrete must be disposed of as TSCA hazardous waste under the WDNR/USEPA OCP MOA prior to demolition and remaining unlabeled drums can be disposed as a non-hazardous waste. In addition, WDNR (2016) notes prior to building demolition, additional sampling will be needed to confirm that all the PCB-contaminated concrete was removed.

Current Status. After the Community Development Authority of the City of Manitowoc took ownership of the property on June 29, 2016, Site assessment activities have continued at the Site as documented in the following capstone reports:

- Stantec, 2016, Site Specific Sampling and Analysis Plan, July 6, 2016.
- Stantec, 2016, Mirro Buildings Structural Condition Assessment, July 25, 2016.
- Stantec, 2016, Photographic Documentation of Former Mirro Building Current Ground Floor Features, July 28, 2016.
- Stantec, 2016, Addendum 1 to the July 6, 2016 Site-Specific Sampling and Analysis Plan, July 28, 2016.
- Stantec, 2016, Geophysical Survey Results and Site Survey, August 15, 2016.
- Stantec, 2016, Inventory of Floor Stains and Photographic Documentation of the Former Mirro Building, August 17, 2016.
- Stantec, 2016, Mirro Building Structural Condition Assessment, September 13, 2016.
- Stantec, 2016, Asbestos and Lead Based Paint Pre-Demolition Survey, September 15, 2016.

As noted previously, WDNR (2016) is requiring additional sampling prior to building demolition to confirm that all the PCB-contaminated concrete was removed. Therefore, Stantec prepared a Site-Specific Sampling and Analysis Plan (SAP) for a Phase II ESA to characterize and assess floor stains and delineate the horizontal and vertical extents of documented PCB releases to concrete. The SAP was submitted to USEPA and WDNR for comments on September 11, 2016, agency comments received, and the document finalized on September 15, 2016. This request for a TSCA coordinated approval, to be led by WDNR, in accordance with the One Cleanup Program Memorandum of Agreement between USEPA and WDNR for a Type C site classification represents a continuation of Site assessment activities. Following implementation of the SAP and delineation of PCB-impacted material, a work plan for abatement will be developed and submitted to USEPA and WDNR for coordinated review.

3. Certification Statement

The Community Development Authority of the City of Manitowoc (Site owner) is aware of and will adhere to the TSCA PCB reporting and recordkeeping requirements at subparts J and K of 40 CFR 761.

Thank you for your consideration, and please don't hesitate to contact me if any additional information is needed.

Sincerely,



Nicolas Sparacio

CC: Tauren Beggs, WDNR (via email)
Jon Peterson, USEPA (via email)
Harris Byers, Stantec (via email)