

**From:** [Ramauskas, Peter](#)  
**To:** [Rojas, Nicholas](#); [Byers, Harris](#)  
**Cc:** [Beggs, Tauren R - DNR](#)  
**Subject:** RE: PCB Self-implementing cleanup plan  
**Date:** Tuesday, May 09, 2017 2:53:35 PM

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Nick/Harris,

Below are some comments from EPA/WDNR on the plan. We'll look forward to the responses. Also wanted to note for your awareness that I will at this stage work only on approval for the PCB impacted building material disposal and will work on approval of future PCB soil remediation under the Coordinated Approvals process with WDNR once the additional site investigations have been completed.

Thanks,  
Peter

*Comment 1:*

Are the debris piles on the ground floor going to be removed before demolition starts so that the proposed temporary caps in the loading dock and area 8 can be installed before building materials start falling onto those areas? Please provide clarification in the plan on when those debris piles will be removed.

*Comment 2:*

Referring to the debris piles, were the piles already in place prior to when the transformers were drained? Is there the potential that the entire depth of the debris piles may have been affected by PCB transformer oils?

*Comment 3:*

In the *PCB concentrations Greater than 50 mg/kg in Area 8* section on page 6: the last sentence needs to be completed, as it now includes XXXXXXX. In the summary list in the same section on page 6, removal of area 14 flooring is stated twice.

*Comment 4:*

Referring to the extent of material to be segregated for disposal as > 50 mg/kg PCB, the delineation of such areas should be extended to the next available data point that is below 50 ppm. Please revise the appropriate figures (e.g. Figures 3, 4, and 5) to reflect this.

*Comment 5:*

Referring to the *Contingency* section, please provide additional clarification on when additional sampling of building materials would be conducted and what the decision criteria are that would

dictate when additional sampling for PCB would occur.

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**From:** Rojas, Nicholas [mailto:ROJNIC@brandenburg.com]  
**Sent:** Friday, May 05, 2017 12:02 PM  
**To:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Subject:** PCB Self-implementing cleanup plan

Mr. Ramanauskas,

Thank you for your response call today. I have attached a PCB self-implementing cleanup plan associated with the former Mirro Building in Manitowoc, Wisconsin. Please let me know if you have any comments or concerns. I will also be sending you a hard copy today.

Regards,

**Nick Rojas | Environmental Engineer | Brandenburg Industrial Service Company**  
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