



August 29, 2017

Nicolas Sporacio
Community Development Department
City of Manitowoc
900 Quay Street
Manitowoc, WI 54220

SUBJECT: Site-Specific Sampling and Analysis Plan - Revision 1 Approval
Mirro-Spirtas – LGU, 1512 Washington Street, Manitowoc, Wisconsin
BRRTS #: 02-36-545108, EPA ID: WID 006 076 574

Dear Mr. Sporacio:

The Department of Natural Resources (DNR) received your Site-Specific Sampling and Analysis Plan (Plan) for characterization and assessment of polychlorinated biphenyls (PCBs) on August 21, 2017, submitted on your behalf by Stantec. The initial version of the Plan was received by the DNR on July 12, 2017. The DNR and the U.S. Environmental Protection Agency (EPA) provided comments via email to Stantec on August 7, 2017. Stantec provided a response to comments via email on August 18, 2017, with revisions to the initial Plan.

Primary revisions to the initial version of the Plan included:

- Modifications to the soil sampling methods since surface concrete is now planned to be removed, instead of left in place;
- Once surface concrete is removed, placing plastic sheeting secured with ¾ inch plywood sheeting as a temporary cover to prevent direct contact and to reduce potential for residual soil contamination to migrate to groundwater;
- Changing to a two-step phased sampling approach to first characterize the magnitude and extent of residual impacts to soil beneath the two PCB release areas on the ground floor to determine the volume of soil warranting excavation, then install soil borings at discrete locations from the surface down to the water table and temporary monitoring wells where initial sampling indicated impacts; and
- If subsurface concrete structures (footing walls, etc.) are encountered, then characterize building materials for proper management and disposal purposes.

After review by DNR and EPA, this letter serves as the approval to proceed with the Plan. Please be aware that you are required to comply with all applicable statutes and administrative rules including the Wis. Admin. ch. NR 700 series and applicable requirements of the Toxic Substances Control Act (TSCA). If you have any questions, please contact me at 920-662-5178 or at Tauren.Beggs@wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tauren R. Beggs'.

Tauren R. Beggs
Hydrogeologist
Remediation & Redevelopment Program

ec: Harris Byers, Stantec (Harris.Byers@stantec.com)
Peter Ramanauskas, EPA (ramanauskas.peter@epa.gov)