

From: Beggs, Tauren R - DNR
Sent: Friday, January 11, 2019 11:01 AM
To: 'Byers, Harris'
Cc: Paul Braun; Choi, Christopher; ramanauskas.peter@epa.gov; April Kroner
Subject: RE: Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Thanks Harris!

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris <Harris.Byers@stantec.com>
Sent: Wednesday, January 9, 2019 12:57 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; April Kroner <akroner@manitowoc.org>
Cc: Paul Braun <PBraun@manitowoc.org>; Choi, Christopher <choi.christopher@epa.gov>; ramanauskas.peter@epa.gov
Subject: Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Team:

After reviewing the recent work completed by AECOM at the Property and the response provided by Newell Rubbermaid, we have finalized the Site Investigation Workplan for the former Mirro facility located at 1512 Washington Street.

An abridged version of the workplan (excluding Appendix A) is attached.

A complete version of the document (including Appendix A) can be downloaded until January 11, 2019 directly from our server at the link below:

https://stantec-my.sharepoint.com/:b:/p/harris_byers/EQ9Gio9d0PxCKw7sudqu1psBrEkVVRHAW0pqTEeH9TY_gg?e=c3xdyx

Tauren – I will mail you a hard copy of the document early next week, with Appendix A and Appendix B on CD-ROM.

Chris/Pete – please let me know when you get this email and I can reactivate the URL above to allow you both to download a complete version for the project file.

Response to specific comments provided by the team are provided below in indented blue text:

1. Comments From Tauren/Pete; email 9/27/18
 - Add analysis of PCBs for soil and groundwater for sample locations SB-20/MW-20 and SB-22/TW-22

PCBs have been added to soil and groundwater for sample locations SB-20/MW-20 and SB-22/TW-22. See updates to Table 1 and Table 2.

- Sample the water from the storm sewer for PCBs at location MH-1. (It is hard to tell based on the differences between Stantec and Symbiont Figures, but I believe Stantec's MH-1 location is the same as Symbiont's MH-114) MH-1 appears to be the first available sampling location closest to the storm sewer lateral coming from the Mirro site.

MH-1 is the first downgradient sample location from the PCB release area. Sampling in the storm sewer will focus primarily on sediment; though if water is present, samples can be collected for PCBs. If PCBs are identified in the storm sewer, the subsequent phase of work is likely to extend up-pipe of MH-1 and continue down-pipe to delineate the extent of impacts.

- The proposed sampling for the tunnel network appears to be the areas currently accessible. If additional staining or observations of impacted concrete is found as other parts of the tunnel network become accessible, those areas should also be evaluated.

We agree with this comment. The initial work described in Section 5.3 (p. 15) and illustrated on Figure 15 includes sampling concrete in the tunnel network nearest the release area. Delineation of known releases to the tunnel network may extend outward from the initial proposed locations and may require confined space entry protocols.

- One other comment I have is in regard to proposed location SB-17/MW-17. There was a monitoring well installed near this same area as part of AECOM's recent limited assessment work at the site. It could be evaluated whether you need to install another well in this location. The existing well may be able to be used instead. A soil sample would still need to be collected in this area if you do decide to use the existing well.

It's possible we may be able to use the well installed by AECOM near the corner of the building. Soil sampling will be needed in that area to determine if a pervasive soil source is present.

2. Comments from Tauren; email August 6, 2018

- Change contact information for CDA to Paul

April Kroner, AICP is the current executive director of the CDA; her contact information is included on page iii

- Are all the temporary wells being abandoned after one round of sampling?

We expect the lithology of the shallow aquifer to be rather coarse; so I suspect we will keep the temporary wells not converted to permanent NR 141 wells to allow for broader measurement of the potentiometric surface. If the lithology is coarse enough and small diameter wells yield enough water, we may propose installing small diameter wells with pre-packed well screens for sentinel monitoring (to save on install and soil disposal costs).

- Are the permanent wells being installed at the same time as the temporary wells or are they being installed after the results are received for the temporary wells?

My hope is the work can be phased in such a manner that most permanent NR 141 wells are installed after we get the data from the temporary wells. However, based on prior work, there are some permanent NR 141 wells that can be installed at the same time as the TWs to confirm prior groundwater data/extent/stability.

- Soil samples should also be compared to industrial direct contact soil standards.

Soil data will be compared to direct contact RCLs for both industrial and non-industrial properties. See updated Section 3.2 on Page 8.

- On Figure 8, I believe the road is the 16th St Right of Way, not 15th St Right of Way, correct?

Figure 8 has been updated accordingly.

- Sediment samples can also be compared to the DNR's Consensus Based Sediment Quality Guidelines (CBSQG): <https://dnr.wi.gov/files/PDF/pubs/rr/RR088.pdf>.

PCBs will remain the primary constituent of concern for the Site Investigation. If additional constituents are measured in sediment, concentrations will be compared to CBSQG criteria. See updated Section 8.2 on Page 21.

We trust this information meets your needs and we look forward to working with this team as the Site Investigation moves forward. As suggested in Section 9, we would like to meet periodically with the team to share results as milestones are reached so future work can be adjusted accordingly.

Sincerely,

Harris Byers

Sr. Brownfields Project Manager

Direct: 414 581-6476

Fax: 262 241-4901

Harris.Byers@stantec.com

Stantec



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From: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Sent: Tuesday, November 13, 2018 8:15 AM
To: Beggs, Tauren R - DNR; April Kroner
Cc: Byers, Harris; Paul Braun; Dan Koski; Kathleen McDaniel
Subject: RE: Mirro Site question

I concur with Tauren's comments.

Thanks,

Peter Ramanauskas
RCRA Corrective Action Project Manager/Regional PCB Coordinator
Remediation and Reuse Branch
Land and Chemicals Division
USEPA Region 5
77 West Jackson Blvd (LU-16J)
Chicago, IL 60604
(312) 886-7890

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Monday, November 12, 2018 9:02 AM
To: April Kroner <akroner@manitowoc.org>
Cc: Byers, Harris <Harris.Byers@stantec.com>; Paul Braun <PBraun@manitowoc.org>; Dan Koski <dkoski@manitowoc.org>; Kathleen McDaniel <kmcdaniel@manitowoc.org>; Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: RE: Mirro Site question

Good morning April,

In the site investigation work plan that was submitted by Stantec in July 2018 for DNR and EPA's review, the plan is to investigate the currently accessible areas of the tunnel network and further investigate remaining PCB impacts (with other more minor impacts from other contaminants). Based on the previous work completed by Stantec there was still staining from PCBs in the tunnel network. The Phase II Environmental Site Assessment in January 2018 revealed there are still concentrations of PCBs in shallow soils above EPA's cleanup action levels. Covering the site with dirt would make it more difficult for Stantec to further assess the site and underlying tunnel network and the dirt would need to be removed for any more remedial action that would need to occur. I have copied Peter Ramanauskas from EPA to provide any comments he may have on this.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: April Kroner <akroner@manitowoc.org>

Sent: Friday, November 9, 2018 8:38 AM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Cc: Byers, Harris <Harris.Byers@stantec.com>; Paul Braun <PBraun@manitowoc.org>; Dan Koski <dkoski@manitowoc.org>; Kathleen McDaniel <kmcdaniel@manitowoc.org>

Subject: Mirro Site question

Hi Tauren,

Happy Friday! 😊

Can the City place dirt over the cement at the Mirro site in an effort to level off the property and improve the aesthetics? We understand this would require site stabilization as well.

Please let me know if the City would be able to do this, and what information/approvals are needed.

Thanks!

April Kroner, AICP

Community Development Director

900 Quay Street, Manitowoc, WI 54220

(920) 686-6930 | akroner@manitowoc.org

From: Beggs, Tauren R - DNR
Sent: Thursday, October 18, 2018 8:07 AM
To: 'Kathleen McDaniel'
Subject: RE: call Thursday?

Hi Kathleen,

I will be in meetings all day today with EPA and the City of Green Bay, then Friday and Monday I will be off, so I will try to get in touch with you next week Tuesday. When I talked to Harris, he said you and him had a discussion about the Mirro site, so just want to follow up with you on that. Last week, I talked to Christine Haag and Judy Fassbender from the Madison DNR office. They are assisting regional project managers with PFAS throughout the state. Harris is interested in either having a conference call or a meeting with them to specifically talk about the PFAS at the Mirro site and also more in general about PFAS for Brownfield redevelopment.

Talk to you Tuesday,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Kathleen McDaniel <kmcdaniel@manitowoc.org>
Sent: Wednesday, October 17, 2018 3:45 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Subject: call Thursday?

Hi Tauren,

I'm sorry I missed you – I was on the phone with another attorney and it took much longer than I expected. I am free on Thursday at 9:30, 11, or from 1-3 if any of those times work for you. Otherwise I'm free Friday between 1-3:30.

Kathleen M. McDaniel

Manitowoc City Attorney

900 Quay Street, Manitowoc, WI 54220

(920) 686-6990 | kmcdaniel@manitowoc.org

From: Beggs, Tauren R - DNR
Sent: Thursday, September 27, 2018 10:22 AM
To: 'Byers, Harris'
Cc: 'Paul Braun'; 'Choi, Christopher'; 'ramanauskas.peter@epa.gov'
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

Some additional comments for the work plan based on my conversation yesterday with Peter:

- Add analysis of PCBs for soil and groundwater for sample locations SB-20/MW-20 and SB-22/TW-22
- Sample the water from the storm sewer for PCBs at location MH-1. (It is hard to tell based on the differences between Stantec and Symbiont Figures, but I believe Stantec's MH-1 location is the same as Symbiont's MH-114) MH-1 appears to be the first available sampling location closest to the storm sewer lateral coming from the Mirro site.
- The proposed sampling for the tunnel network appears to be the areas currently accessible. If additional staining or observations of impacted concrete is found as other parts of the tunnel network become accessible, those areas should also be evaluated.

One other comment I have is in regard to proposed location SB-17/MW-17. There was a monitoring well installed near this same area as part of AECOM's recent limited assessment work at the site. It could be evaluated whether you need to install another well in this location. The existing well may be able to be used instead. A soil sample would still need to be collected in this area if you do decide to use the existing well.

Regards,

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Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Beggs, Tauren R - DNR
Sent: Wednesday, September 26, 2018 1:10 PM
To: 'Byers, Harris'
Cc: Kathleen McDaniel (kmcddaniel@manitowoc.org)
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin
Attachments: 20180924_2_RP_Ltr.pdf

Hi Harris,

I can look at getting something organized and will relay our correspondence to Christine and Judy for reference. I recommend you have a conversation with the City to get their input prior to our follow up conversation.

Yes, a RP letter was sent to Newell, which is also available on BRRS on the Web, but have attached to the email as well. I will let you know about getting something organized once I have been able to talk to Christine and/or Judy.

Regards,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris <Harris.Byers@stantec.com>
Sent: Wednesday, September 26, 2018 12:44 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Cc: Kathleen McDaniel (kmcddaniel@manitowoc.org) <kmcddaniel@manitowoc.org>
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Yes, I agree a follow-up with Christine and Judy would be excellent so we can plan accordingly for the SI and any offsite investigations needed/required. Can you organize that meeting asap?

I understand the City's intention all along is to ultimately transfer (sell) Mirro to a developer who would not have an LGU exemption – so the objective now is to move forward through the program as though the current owner did not have an LGU exemption.

Is (has) an RP letter being sent to Rubbermaid?

Sinc.
Harris

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Wednesday, September 26, 2018 12:37 PM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Kathleen McDaniel (kmcddaniel@manitowoc.org) <kmcddaniel@manitowoc.org>
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

As previously stated, the City is an exempt LGU, so does not have responsibility under the spill law for this site. Therefore, a RP letter was not sent to the City. Christine Haag and Judy Fassbender out of DNR Central Office in Madison are who regional project managers are working with for PFAS, so I am not able to answer your questions in regard to financial assistance, additional testing in Manitowoc, changes to the QAPP, etc. at this time. We should likely have follow up conversations, which would need to involve Christine & Judy and the City.

The PFAS is currently included under the existing case number.

Regards,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris <Harris.Byers@stantec.com>

Sent: Wednesday, September 26, 2018 12:19 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Cc: Kathleen McDaniel (kmcdaniel@manitowoc.org) <kmcdaniel@manitowoc.org>

Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Tauren:

Thank you for the email.

From our earlier discussions, you had indicated that if PFOAs were detected in groundwater in Manitowoc that you would require a citywide Site Investigation (soil/sediment/GW) to determine the source/extent of PFOA impacts to groundwater in the City; possibly extending outward to Lake Michigan and the Manitowoc River. Is that still the conceptual plan moving forward, and if so, has an RP letter been sent accordingly? Will WDNR provide financial assistance to the City on this required investigation? Will WDNR be conducting any additional testing in Manitowoc or at the Mirro facility for PFOAs?

Since there is already a BRRTS number associated with Mirro, will you be tracking this under the existing case number or opening a new case number?

Finally, now that they have been detected on the property, will you require delineation of PFOAs in soil and groundwater on the property as part of NR716 SI if the property stays in ERP? What if it enters VPLE? If so, we will need to make major revisions to the SI workplan and the QAPP for the project.

Sincerely,

Harris Byers

Brownfields Project Manager

Direct: 414 581-6476
Fax: 262 241-4901
Harris.Byers@stantec.com

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From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Wednesday, September 26, 2018 11:46 AM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Kathleen McDaniel (kmcdaniel@manitowoc.org) <kmcdaniel@manitowoc.org>
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

Good timing, yes we received the notification of discharge form and lab data on Monday. It is available on BRRTS on the Web, but I have also attached it to this email for your reference. I don't have the reports yet, but those will likely be submitted soon. PFAS were detected at the site and/or right-of-way (ROW) in the six wells sampled. PFOA ranged from 6.69 – 4,080 ppt and PFOS ranged from no detection to 6.01 ppt. MW-19 had the highest concentrations which was the monitoring well installed immediately downgradient of the loading dock area. The rest of the wells were on the perimeter of the property and/or in the ROW. You will need to coordinate with Kathleen on the City's plan for PFAS, as they are an exempt local government unit (LGU) for this site.

In regard to the site investigation workplan, Peter Ramanauskas provided some comments to me on Monday so I am trying to set up a time to talk to him today, if possible. Left him a voicemail this morning. Once I have had a chance to talk to him, we can provide the final comments to you for the work plan.

If you have any questions, please feel free to contact me.

Regards,

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Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris <Harris.Byers@stantec.com>
Sent: Tuesday, September 25, 2018 4:12 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

[Tauren:](#)

Just circling back on this email string to see if the PFOA data is available for the Mirro property. I'd like to get the SI workplan finalized so the City can start implantation of the USEPA Assessment Grant as soon as possible.

Thanks!

Harris Byers

Brownfields Project Manager

Direct: 414 581-6476

Fax: 262 241-4901

Harris.Byers@stantec.com

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From: Byers, Harris

Sent: Monday, August 06, 2018 3:39 PM

To: 'Beggs, Tauren R - DNR' <Tauren.Beggs@wisconsin.gov>

Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Thanks; yes – PLEASE send to me as soon as they arrive so we can plan for next steps at the Mirro property (and citywide).

HB

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]

Sent: Monday, August 06, 2018 3:38 PM

To: Byers, Harris <Harris.Byers@stantec.com>

Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

We expect to get the initial sampling results from the gravel pit site in Newton early this week. For Mirro, we likely won't have those results until near the end of this month. I can let you know once I receive the results from AECOM.

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Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]

Sent: Monday, August 6, 2018 3:25 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

What have you heard re: PFOA/PFAS sampling? Any preliminary data? I suspect that if those are detected in groundwater, then we will need major revision of the SI Workplan to include those constituents in soil/gw.

Harris

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Monday, August 06, 2018 3:12 PM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Paul Braun <PBraun@manitowoc.org>; Choi, Christopher <choi.christopher@epa.gov>; rmanauskas.peter@epa.gov
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

Thanks for the clarifications below. This does not include comments from Peter.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]
Sent: Monday, August 6, 2018 3:08 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Cc: Paul Braun <PBraun@manitowoc.org>; Choi, Christopher <choi.christopher@epa.gov>; rmanauskas.peter@epa.gov
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Tauren:

Thanks for the review and comments. Do these comments include those from Peter at USEPA?

Will get these comments addressed in the revised document; initial responses are below in blue.

Sincerely,
Harris

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Monday, August 06, 2018 2:09 PM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Paul Braun <PBraun@manitowoc.org>; Choi, Christopher <choi.christopher@epa.gov>; rmanauskas.peter@epa.gov
Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Hi Harris,

I have reviewed the work plan and have the following comments/questions:

- Change contact information for CDA to Paul – [Indeed](#)
- Are all the temporary wells being abandoned after one round of sampling? [We expect the lithology of the shallow aquifer to be rather coarse; so I suspect we will keep the temporary wells not converted to NR 141 wells to allow for broader measurement of the potentiometric surface. If the lithology is coarse enough and small diameter wells yield enough water, we may propose installing small diameter wells with pre-packed well screens for sentinel monitoring \(to save on install and soil disposal costs\).](#)
- Are the permanent wells being installed at the same time as the temporary wells or are they being installed after the results are received for the temporary wells? [My hope is the work can be phased in such a manner that most NR 141 wells are installed after we get the data from the temporary wells. However, based on prior work, there are some NR 141 wells that can be installed at the same time as the TWs to confirm prior groundwater data/extent/stability.](#)
- Soil samples should also be compared to industrial direct contact soil standards. [That sounds reasonable. We will be using EQUIS for data management, so we can easily compare data across multiple exposure pathways.](#)
- On Figure 8, I believe the road is the 16th St Right of Way, not 15th St Right of Way, correct? [YES, will update the drawing accordingly and standardize with Figure 12.](#)
- Sediment samples can also be compared to the DNR's Consensus Based Sediment Quality Guidelines (CBSQG): <https://dnr.wi.gov/files/PDF/pubs/rr/RR088.pdf>. [Indeed; thanks for the comment. Will add CBSQG to the workplan, though PCBs will remain the primary constituent of concern for the Workplan.](#)

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]

Sent: Tuesday, July 10, 2018 4:24 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; Choi, Christopher <choi.christopher@epa.gov>; ramanauskas.peter@epa.gov

Cc: Paul Braun <PBraun@manitowoc.org>

Subject: RE: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

If you were interested, Appendix A to the SI workplan is a collection of additional/historic photographs of prior work. I've uploaded the PDF file (55 MB) to our FTP server; you can access the file through the link below:

Login Information

FTP link: <https://tmpsftp.stantec.com>

Login name: s0724145218

Password: 4730512

Sincerely,

Harris

From: Byers, Harris

Sent: Tuesday, July 10, 2018 4:16 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; Choi, Christopher <choi.christopher@epa.gov>; ramanauskas.peter@epa.gov

Cc: Paul Braun <PBraun@manitowoc.org>

Subject: Draft Site Investigation Workplan - Former Mirro Facility in Manitowoc, Wisconsin

Team:

As a continuance of prior work at the former Mirro facility located at 1512 Washington Street, attached is the working draft of the Site Investigation workplan for your review. I'm sending you the WORD version of the text and the Excel versions of the tables to facilitate your review. Figures are attached as a single PDF file.

Please feel free to make comments using track changes and email the documents back. Once comments are received from the team, I will finalize the document (prepare Appendix B) and send out as a complete PDF for your records (and hard copy to Tauren for WDNR files). The intent of this workplan is to set out a roadmap forward, but the workplan is certainly not set in stone. As we move forward with the phases work, we will keep everyone in the loop so subsequent sampling can be adjusted as needed.

Just a few notes:

Chris – this document will also serve as the Site-Specific Sampling and Analysis Plan for the CDA's FY 18 site-specific assessment grant. I'd be glad to chat over the phone or in person to further summarize how this proposed work builds on the prior work completed at the property.

Peter (and Tauren) – this document builds on the prior PCB work at the Site following removal during building demolition. As the occupancy level and proposed reuse of portions of the Site impacted with PCBs remain unknown, we propose the interim remedial objective for soil to be 100 ppm total PCBs (the total of 7 Aroclor mixtures). If possible, we will attempt to delineate vertical and horizontal soil impacts down to 25 PPM as a secondary objective realizing however that future redevelopment may require additional delineation based on proposed reuse.

Thanks to everyone for your continued support/expertise on this project.

Sincerely,

Harris Byers

Brownfields Project Manager

Direct: 414 581-6476

Fax: 262 241-4901

Harris.Byers@stantec.com

Stantec



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From: Beggs, Tauren R - DNR
Sent: Tuesday, July 10, 2018 2:38 PM
To: 'Byers, Harris'
Subject: RE: SI Workplan for Mirro

Hi Harris,

The electronic file as you have outlined it below is good for the draft. I do not need a hard copy.

Thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]
Sent: Tuesday, July 10, 2018 2:28 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Subject: RE: SI Workplan for Mirro

Tauren:

With Nic's transition, the City has been (understandably) a bit behind on reviewing the SI workplan. I received their comments today, so I can finalize and send you (and cc USEPA) the SI workplan for Mirro.

Question on workflow; realizing this is a draft document for your comment, would you like the draft workplan as a WORD file (figures/tables as PDF) – or would you prefer a hard copy? My expectation is we will submit the draft workplan to you and USEPA for review/comment and then prepare a final workplan based on feedback from the team. The SI workplan then will become the SAP for the purpose of the USEPA Brownfield Site-Specific Assessment Grant (which will start October 1, 2018).

Sincerely,

Harris Byers

Brownfields Project Manager

Direct: 414 581-6476

Fax: 262 241-4901

Harris.Byers@stantec.com

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From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Monday, June 18, 2018 10:50 AM

To: Byers, Harris <Harris.Byers@stantec.com>

Subject: RE: SI Workplan for Mirro

Thanks for the update Harris! Yeah I heard about Nic, good for him on the new position, I enjoyed working with him. I'm glad Paul is the one stepping into his place.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]

Sent: Monday, June 18, 2018 10:47 AM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Subject: RE: SI Workplan for Mirro

Tauren:

Not sure if Nic mentioned, but he's taken a new position and is no longer with the City of Manitowoc. Paul Braun will be serving as the Project Manager for the brownfields program for the foreseeable future. Paul has been an integral part of the Brownfields team since the City's first grant; so I'm sure this will be a seamless transition.

We're working through the admirative documents at the moment to get the FY18 USEPA Brownfields CWA grant started in July so the City can make their 120d due diligence commitment on the RR properties. I know Paul wants to get the Mirro workplan out ASAP so work can start in the Fall - but it may be a few weeks yet before he has time to review our current draft.

Apologies again for the delay in getting this to you.

Sincerely,
Harris

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]

Sent: Tuesday, June 12, 2018 7:56 PM

To: Byers, Harris <Harris.Byers@stantec.com>

Subject: RE: SI Workplan for Mirro

Thanks Harris!

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]
Sent: Tuesday, June 12, 2018 1:43 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Subject: RE: SI Workplan for Mirro

Tauren!

Great to hear from you. The draft is with the City for their review/comment. Let me follow up with Nic and see if we can get an update on schedule.

Harris

From: Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]
Sent: Tuesday, June 12, 2018 7:20 PM
To: Byers, Harris <Harris.Byers@stantec.com>
Subject: SI Workplan for Mirro

Hi Harris,

Hope you are doing well! You had provided me via email back in April 2018 that an SI workplan was forthcoming for the Mirro site. Are you planning to submit the SI Workplan soon? Please let me know when you have a chance.

Thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

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From: Beggs, Tauren R - DNR
Sent: Friday, April 20, 2018 1:03 PM
To: 'Byers, Harris'
Cc: ramanauskas.peter@epa.gov
Subject: RE: Review of Reports from Mirro

Hi Harris,

I have reviewed the documents you have listed below and I'm sure Peter has reviewed the applicable ones that were sent to him; however, I have not officially followed up with him. The report that pertains the most to the R&R program is the Phase II ESA – PCBs in the subsurface. I agree with your conclusions in that report for the two PCB areas and I'm assuming this will be more detailed in the upcoming SI Workplan. Some things that come to mind: is the site investigation workplan still going to be focused on just these two areas, then looking at the other areas already identified at a later time? or is a more comprehensive work plan of all the contamination issues that have been identified going to be included in the work plan? I don't think you need to send in fees for reviews of the reports already submitted/listed below, but if you want a detailed coordinated review and written response to the site investigation work plan that you plan to submit, then that fee is \$700. Please refer to the DNR's technical assistance form at the following link: <https://dnr.wi.gov/files/PDF/forms/4400/4400-237.pdf>.

Have a nice weekend,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Byers, Harris [<mailto:Harris.Byers@stantec.com>]
Sent: Thursday, April 19, 2018 2:53 AM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Subject: Review of Reports from Mirro

Tauren:

Good morning. We're working on the SI workplan for Mirro and I wanted to circle back on the library of reports submitted recently to see if you/Peter R. have had a chance to review and if you had any comments to strengthen the next phases of work. The reports are listed below for quick reference:

Report	Date
Phase II ESA – PCBs in subsurface	January 25, 2018 February 7, 2018
PCB Removal and Cleanup Documentation Report	March 1, 2018 March 1, 2018 March 2, 2018

Demolition Waste Summary Report Pre-Demolition Summary Report Deregistration of PCB Transformers

Can you please provide some guidance on the appropriate fee for your review of the documents above and the forthcoming SI workplan so the City can get sorted as well.

Sincerely,

Harris Byers

Brownfields Project Manager

Direct: (262) 643-9174

Fax: (262) 241-4901



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