

**From:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Sent:** Thursday, May 30, 2019 9:10 AM  
**To:** Beggs, Tauren R - DNR; Byers, Harris  
**Cc:** Van Der Kloot, James; April Kroner; pbraun@manitowoc.org  
**Subject:** RE: Remedial Objective for PCBs in Soil at Former Mirro Facility

Hi all,

Just wanted to add that the federal TSCA Coordinated Approval authority is under 40 CFR 761.77(c) for remediation activities. Under that process, EPA will coordinate with WDNR on review of the RAOR for the site to address the PCB contamination.

Please let me know if there are any additional questions.

Regards,

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

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Wednesday, May 29, 2019 9:15 AM  
**To:** Byers, Harris <[Harris.Byers@stantec.com](mailto:Harris.Byers@stantec.com)>  
**Cc:** Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>; Van Der Kloot, James <[vanderkloot.james@epa.gov](mailto:vanderkloot.james@epa.gov)>; April Kroner <[akroner@manitowoc.org](mailto:akroner@manitowoc.org)>; [pbraun@manitowoc.org](mailto:pbraun@manitowoc.org)  
**Subject:** RE: Remedial Objective for PCBs in Soil at Former Mirro Facility

Hi Harris,

This site is under the coordinated approval process so per the PCB MOA between EPA and DNR, a Remedial Action Options Report (RAOR) would need to be submitted with a risk based approach for approval by both agencies. Risk based approval is under 40 CFR 761.61(c). Written approval will require the report be submitted with the \$1,050 fee per Wis. Admin. Code ch. NR 749. This site would likely have a "high occupancy" classification based on the preliminary redevelopment plans I have seen for future development. With high occupancy sites, cleanup of total PCBs is generally supposed to be <10ppm with a performance standard cover and continuing obligation. There have been instances where >10ppm has been accepted, but that is on a site-specific basis.

Peter, please add any comments or revisions you may have.

Thanks,

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**Tauren R. Beggs**

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[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)

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

**Sent:** Tuesday, May 28, 2019 10:22 AM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>; Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>; [Vanderkloot.james@epa.gov](mailto:Vanderkloot.james@epa.gov); April Kroner <[akroner@manitowoc.org](mailto:akroner@manitowoc.org)>; [pbraun@manitowoc.org](mailto:pbraun@manitowoc.org)

**Subject:** Remedial Objective for PCBs in Soil at Former Mirro Facility

Tauren, Peter, and Team:

We have received the soil data back from the first two phases of sampling at the former Mirro facility located in Manitowoc, and we will soon begin writing the Phase II ESA. The objective of this sampling was in part to delineate the vertical and horizontal extents of PCB impacts to soil (and groundwater) at the "Loading Dock" and "Area 8" release areas.

The proposed reuse of the Site will likely be a mixture of non-industrial uses. Therefore, the entirety of the Site (including the two PCB-release areas) will be capped with an engineered barrier (e.g. building slab; parking lot; etc.) maintained with an institutional control.

Therefore, to target the Phase II ESA report to the most probable remedial action, I am writing to ask for guidance/clarification on the concentration of PCBs in soil you will allow to remain below an engineered barrier.

Sincerely,

**Harris Byers**

Sr. Brownfields Project Manager

Direct: 414 581-6476

Fax: 262 241-4901

[Harris.Byers@stantec.com](mailto:Harris.Byers@stantec.com)

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