



November 17, 2020

Kristin Jones
Newell Operating Company
6655 Peachtree Dunwoody Road
Atlanta, GA 30328

Subject: Review of Site Investigation Work Plan
Mirro Plt 9 (Former) - LGU
1512 Washington Street, Manitowoc, WI
BRRTS #: 02-36-545108

Dear Ms. Jones:

On October 16, 2020, the Wisconsin Department of Natural Resources (DNR) received the *NR 716 Site Investigation Work Plan (SIWP)* prepared on Newell Operating Company's (Newell) behalf by Ramboll US Consulting, Inc. (Ramboll). The SIWP was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

Background

The site has been used historically for heavy industrial operations and aluminum cookware manufacturing by the Mirro company. The Community Development Authority of the City of Manitowoc (CDA) previously acquired the site and has the local government unit (LGU) environmental liability exemption. The historic Mirro buildings have all been demolished on-site. Investigation of the site has been ongoing for years and volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals, and perfluoroalkyl and polyfluoroalkyl substances (PFAS) have been detected in soil and/or groundwater. Newell is the responsible party (RP) for the contamination at the site. DNR recently issued a letter on September 16, 2020, to document the additional site investigation needed at this site.

SIWP Summary

The SIWP proposes the following:

- A baseline groundwater level measurement and groundwater sampling event of the existing network (28 monitoring wells and one piezometer) for VOCs, PAHs, PCBs, PFAS (WI 36 Compound List) and/or select metals (RCRA 8, aluminum, antimony, copper, iron, manganese, and thallium).
- Additional characterization of LNAPL in MW-12.
- A comprehensive utility corridor assessment (includes Sherman Creek storm water feature). Based on the assessment, an interim report of findings and work plan will be prepared and submitted for sampling of sediment, soil, and/or vapor in utilities, if necessary.

- Drill 27 soil borings, with 18 converted to monitoring wells analyzed for the same contaminants as noted above. Soil samples will be collected from 0-4 feet below ground surface (bgs), 4-10ft bgs, and if applicable, the saturated zone.
- Five deep soil borings (four on-site, one off-site), converted to piezometers, will be installed in the Loading Dock Area and Area 8 on-site and one deep soil boring converted to a piezometer off-site. Piezometers will be analyzed for the same contaminants as noted above.
- A groundwater level measurement and groundwater sampling event of the existing and new monitoring wells and piezometers for the same contaminants as noted above.
- A comprehensive private and municipal water supply well review and database search. Municipal well and/or private well sampling is not proposed to be sampled at this time until there is sufficient evidence to warrant it.

DNR Review of the SIWP

The DNR concurs with the proposed work in the SIWP, with the incorporation of the following comments:

A. Evaluation of Environmental Media

- All environmental media affected or potentially affected by the contamination must be evaluated (Wis. Admin. Code § NR 716.07(4)).

1. Soil and/or Groundwater:

Historic Sample Locations:

- AMEC_MW-16A had elevated concentrations of benzo(a)pyrene and other PAHs detected in soil. Evaluate if further sampling is needed in this area.
- GP-2 had petroleum and chlorinated VOCs detected in soil and/or groundwater. Evaluate if further sampling is needed in this area.
- GP-5 had elevated concentrations of trichloroethene (TCE). Soil and groundwater sampling (SB-208/MW-208) is proposed at this location. Depending on additional sampling, a piezometer may be needed in this area to define vertical extent.
- SB-3/MW-3 had elevated concentrations of TCE. Depending on additional sampling, a piezometer may be needed in this area to define vertical extent.

Proposed Sample Locations:

- Soil sampling is needed for PFAS at the proposed SB-206/PZ-206 location.
- A monitoring well is needed at the proposed SB-210 location to sample groundwater for VOCs, PCBs, and PFAS.
- Remove analysis for PAHs and metals at the off-site proposed SB-216 and SB-219 soil sample locations.
- There are still data gap areas on-site in the west (around SB-99 area), east (east and northeast of Area 8), south (southern 1/3 of the site), and northeast portions of the site (around the SB-10 & SB-82 area). Additional sampling is needed to better characterize PCBs, VOCs, and/or PAHs within these areas. It is highly recommended this additional sampling is completed during this

proposed work to determine if there are further concerns in any of these areas that would require additional investigation.

Other DNR Comments

1. Depending upon the results of the sampling from this proposed work, additional investigation may be necessary to define the degree and extent of the contamination.
2. Sampling results must be sent to the DNR and property owner, including owners of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).
3. All Wis. Admin. Code ch. NR 700 submittals must be submitted in an electronic format through the RR Submittal Portal.
4. NR 700 semi-annual progress reports will be required until the case is closed.

Schedule

The SIWP includes an implementation schedule for conducting the field investigation, per Wis. Admin. Code § NR 716.09(2)(h), which includes:

- Per Wis. Admin. Code § NR 716.11(1)(2r), field investigation activities will be initiated within 60 days after the DNR approval of the work plan, by January 16, 2021.
- Results of the site investigation activities will be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR will be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. (A fee will be required with submittal of the site investigation report through the enforcement process for DNR review and response.)

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,



Tauren R. Beggs
Project Manager – Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Jeanne Tarvin, Ramboll (jtarvin@ramboll.com)
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