

From: Beggs, Tauren R - DNR
Sent: Tuesday, July 12, 2022 11:24 AM
To: Kristin Jones (Kristin.Jones@newellco.com)
Cc: Rodriguez, Gabriel M.; Jeanne Tarvin; Paul Lindquist; Susan Petrofske; ategen@manitowoc.org; Byers, Harris
Subject: Site Investigation Work Plan Review Letter for Mirro Plt 9 (Former) - LGU, BRRTS # 02-36-545108
Attachments: 20220712_36_SIWP_Appr.pdf

Hi Kristin,

Attached is the electronic version of the Site Investigation Work Plan (SIWP) Review Letter with comments for the above referenced site.

If you have any questions in regard to the letter, please feel free to contact me.

Regards,

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Tauren R. Beggs

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Ave

Green Bay, WI 54313

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Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

dnr.wi.gov



July 12, 2022

Newell Operating Company
Attn: Kristin Jones
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Via electronic mail only to Kristin.Jones@newellco.com

Subject: Review of Site Investigation Work Plan
Mirro Plt 9 (Former) - LGU
1512 Washington Street, Manitowoc, WI
BRRTS #: 02-36-545108; FID #: 436033730

Dear Ms. Jones:

On June 6, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Additional Site Investigation Work Plan and Response to WDNR Comments (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. Ch. 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.

SIWP Summary

DNR recently issued a letter on April 6, 2022, to document the additional site investigation needed at this site. This SIWP was submitted to address the remaining investigation needed and proposed the following:

- Utility televising/inspection to document and evaluate the condition of the utilities and to identify whether sediment is present.
- Installation of three off-site monitoring wells near the Sherman Creek storm water feature.
- One year of groundwater monitoring of the current monitoring well and piezometer network, along with the three new off-site monitoring wells for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), per- and polyfluoroalkyl substances (PFAS) and/or select metals. Monitoring will include groundwater elevation measurements and light non-aqueous phase liquid (LNAPL) monitoring.
- Utility conduit vapor sampling in the sanitary sewer and Sherman Creek storm water feature.
- Utility sediment and surface water sampling from the Sherman Creek storm water feature for PCBs.
- Reporting of additional site investigation activities.

DNR Review of the SIWP

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

- Ramboll is requesting approval to change notification from 10 to 15 business days of receiving lab analytical due to additional time required to perform quality assurance review of PFAS data. The DNR concurs with the alternative sampling results notification from 10 days to 15 days, which is approvable on a case-by-case basis under Wis. Admin. Code § NR 716.14(3).
- DNR concurs with one year of quarterly monitoring with the following comments:
 - DNR recommends another monitoring well be installed downgradient of MW-226 at this time, so it can be included in the one year of monitoring for PFAS.
 - Include MW-204 and MW-213 in the four quarterly rounds of PFAS sampling.
 - Include MW-217 and MW-219 in the four quarterly rounds of VOC sampling.
 - Include AMEC-MW-14 for aluminum, AMEC-MW17 for antimony, and MW-6 for lead in the 1st and 3rd quarterly rounds of sampling.
 - Additional PCB sampling in groundwater at MW-6, MW-19, and MW-25.
 - Depending on results of the additional groundwater sampling outlined above, additional site investigation may be needed.
- After televising the utility tunnel beneath South 16th Street, determine a feasible method for collecting a vapor sample from the utility tunnel.
- The information provided for utility backfill is not sufficient, so the previous recommendation from DNR still applies. DNR still recommends sampling utility backfill or providing a more detailed justification as to why it is not a potential preferential pathway.
- No information was provided for vapor assessment of off-site properties, so the previous recommendation from DNR still applies. Evaluate whether off-site properties to the west screen in for vapor sampling per the VOC screening criteria in *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin* (RR-800) due to residual VOC contamination. This includes the chlorinated VOC impacted soil screening criteria.

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. All Wis. Admin. Code ch. NR 700 submittals must be submitted in an electronic format through the RR Submittal Portal.
3. 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 September 12, 2022.
- Results of the site investigation activities will be submitted to the DNR in a 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 may be submitted for DNR review and response.

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Ms. Kristin Jones, Newell Operating Company
Review of Site Investigation Work Plan
Mirro Plt 9 (Former) – LGU, BRRTS #: 02-36-545108

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: Gabriel Rodriguez, Arent Fox Schiff (gabriel.rodriguez@afslaw.com)
Jeanne Tarvin, Ramboll (jtarkin@ramboll.com)
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