

From: Beggs, Tauren R - DNR
Sent: Wednesday, April 3, 2024 2:06 PM
To: Kristin Holloway Jones (kristin.jones@newellco.com)
Cc: Jeanne Tarvin; Paul Lindquist; Rodriguez, Gabriel M.; Sawula, Andrew N.; Adam Tegen
Subject: Review of the Site Investigation - Additional Investigation Needed Letter for Mirro Plt 9 (Former) - LGU, BRRTS # 02-36-545108
Attachments: 20240403_140_SIR_Not_Appr.pdf

Hi Kristin,

The Review of the Site Investigation - Additional Investigation Needed Letter for the above referenced site is attached. The letter outlines what the DNR concurred with and did not concur with for the additional investigation work completed at the site.

If you have any questions, please let me know.

Regards,
Tauren

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Tauren R. Beggs

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April 3, 2024

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 the Site Investigation – Additional Investigation Needed
Mirro Plt 9 (Former) – LGU, 1512 Washington Street, Manitowoc, WI
BRRTS #: 02-36-545108, FID #: 436033730

Dear Ms. Jones:

On February 8, 2024, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Report Addendum* (SIR) prepared by Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), for Mirro Plt 9 (Former) – LGU, 1512 Washington Street, Manitowoc, Wisconsin. The SIR was submitted with a fee for DNR review and response. The SIR was reviewed for compliance with Wisconsin Administrative (Wis. Admin.) Code ch. NR 716.

Review

The DNR reviewed the SIR and all available historical site investigation documentation in the case file and determined that additional work is needed to meet the requirements of Wis. Admin. Code ch. NR 716 to complete the site investigation. The degree and extent of contamination identified at the site has not been adequately characterized and documented.

Background

The site has been used historically for heavy industrial operations and aluminum cookware manufacturing by the Mirro company. The City of Manitowoc Community Development Authority (CDA) previously acquired the site in 2016 and has the local government unit (LGU) environmental liability exemption. The Mirro buildings that were on-site have all been demolished but some foundations remain. Investigation of the site has been ongoing for years and volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals, and per- and polyfluoroalkyl substances (PFAS) have all been detected in soil and/or groundwater. NOC is the responsible party (RP) as the causer of the contamination at the site. A previous site investigation report was submitted to the DNR on February 25, 2022, and DNR determined additional investigation was needed on April 6, 2022. A site investigation work plan was submitted to DNR on June 6, 2022, and the work plan was approved with comments on July 12, 2022. The February 2024 SIR was submitted to DNR to provide the findings of additional investigation work completed in 2022 and 2023.

Completion of the Site Investigation

After reviewing the SIR and all available historical site investigation documentation in the case file submitted to date, the DNR has determined that additional work is necessary to complete the site investigation. The degree and

extent of contamination currently identified at the site has not been adequately defined and documented with respect to Wis. Admin. Code ch. NR 716. The findings and interpretations by the DNR regarding the completeness of the site investigation are summarized below:

Degree and Extent of Contamination in All Affected Media

Degree and extent of contamination is not completely defined. Refer to the Review of the Site Investigation – Additional Investigation Needed letter, dated April 6, 2022, for the portions of the site investigation that DNR concurred with previously. This letter outlines the additional investigation conclusions that DNR concurs with and the additional investigation still needed.

The DNR concurs with the following based on the justifications provided by Ramboll in the SIR:

- No sampling is needed in the utility backfill.
- No sampling is needed in the utility tunnel under S. 16th Street.
- No additional vapor sampling is needed in-pipe in the sanitary or storm sewers.
- No additional investigation is needed for metals in groundwater; however, metals should continue to be monitored in existing monitoring wells to establish stable or receding contaminant trends.

The DNR is requiring additional information and/or investigation for the following:

- Vapor Intrusion: The vapor intrusion screening for chlorinated volatile organic compounds (CVOCs) indicates there is a building within 100 feet of CVOCs in soil. DNR recommends installation of two or more passive soil gas probes in the area of soil boring SB-209 along the western property boundary (where trichloroethylene (TCE) was found in soil) to determine if CVOCs are a concern for vapor intrusion. If soil gas sampling results show elevated concentrations, then off-site vapor sampling would be required. Another option would be to do sub-slab vapor sampling at the off-site industrial building in lieu of doing soil gas sampling. Analysis should be limited to the contaminants of concern (i.e. tetrachloroethylene, TCE, trans-1,2-dichloroethylene, cis-1,2-dichloroethylene, and vinyl chloride).
- PFAS: Additional PFAS investigation is needed since the extent of PFAS in groundwater is not defined based on the Wisconsin Department of Health Services (DHS) recommended standards. DNR indicated additional PFAS investigation was needed in the Review of the Site Investigation – Additional Investigation Needed letter dated April 6, 2022, and the installation of the two additional off-site monitoring wells and one year of monitoring did not alter that previous determination.
- Sediment and Surface Water: Even though no storm water is being conveyed during the 2021 and 2022 televising events, this was completed post-building demolition and utility lateral abandonment. Historically, storm water would have been conveyed and possible sediment deposited over the many years that the Mirro facility operated. Provide additional information on if historic sediment is present in the storm sewer tunnel. If sediment is present, it would need to be sampled for PCBs. Based on lack of surface water conveying into the storm sewer tunnel, no surface water sampling is needed.

As previously indicated in the Review of the Site Investigation – Additional Investigation Needed dated April 6, 2022, the Remedial Actions Options Report (RAOR) can be completed concurrently with the additional site investigation since the on-site investigation is complete and only off-site investigation is still needed. As indicated in the SIR, additional evaluation of Light Non-Aqueous Phase Liquid (LNAPL) recoverability will be incorporated into the remedial action evaluation. Based on additional investigation results, additional investigation may be needed.

Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of a supplemental site investigation work plan within 60 days of the date of this letter. The work plan must comply with Wis. Admin. Code § NR 716.09(2). A fee is recommended for DNR review and response.
- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.
- Per Wis. Admin. Code § NR 716.14, all sampling results are required to be submitted to DNR and the property owner within 10 days of receiving the laboratory data.
- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation. A fee is recommended for DNR review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (920) 510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,



Tauren R. Beggs
Hydrogeologist
Remediation & Redevelopment Program

cc: Jeanne Tarvin, Ramboll (jtarvin@ramboll.com)
Paul Lindquist, Ramboll (plindquist@ramboll.com)
Gabriel Rodriguez, Arent Fox Schiff (gabriel.rodriguez@afslaw.com)
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Adam Tegen, City of Manitowoc Community Development Authority (ategen@manitowoc.org)