

From: Paul Lindquist <PLINDQUIST@ramboll.com>
Sent: Monday, June 3, 2024 5:49 PM
To: Beggs, Tauren R - DNR
Cc: Kristin Jones (Kristin.Jones@newellco.com); Adam Tegen; 'Byers, Harris'
Subject: 02-36-545108 Mirro Plt 9 (Former)—LGU: Response to WDNR Comments Letter
Attachments: FW: 0236545108: Other; 02-36-545108_Response to Comments_06 03 2024.pdf

Good afternoon Tauren,

Attached for your records is a copy of a *Response to WDNR Comments Letter* for the Mirro Plant. No. 9 (Former) (BRRTS: 02-36-545108) located at 1512 Washington Street in Manitowoc, Wi. Please note, the letter has been uploaded to the WDNR RR Program Submission Portal. A confirmation e-mail from our office manager, Carolyn Kasten, is attached.

Have a great rest of your day.

Paul Lindquist

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Classification: Confidential

Sent via E-Mail and WAMS

Mr. Tauren Beggs
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

**RESPONSE TO WDNR COMMENTS LETTER
MIRRO PLANT NO. 9 (FORMER)
1512 WASHINGTON STREET, MANITOWOC, WISCONSIN
WDNR BRRTS NO. 02-36-545108 | FID NO. 436033730**

Dear Mr. Beggs:

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), has prepared this *Response to WDNR Comments* letter (the "RTC letter") to address the comments provided by the Wisconsin Department of Natural Resources (WDNR) in their April 3, 2024, *Review of the Site Investigation – Additional Investigation Needed* letter (the "WDNR letter").

June 3, 2024

NOC's responses to WDNR's comments are provided below and are based on our current understanding of site conditions, current promulgated Wisconsin Administrative Code (WAC) regulations, and additional work being requested by the WDNR. For ease of review, the WDNR's comments are included in italicized font below.

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WDNR Comments Regarding Degree and Extent of Contamination in All Affected Media

- *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 area 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).*

Ref. 1690019647

NOC Response

Ramboll acknowledges this comment. Work activities pertaining to vapor intrusion investigation activities near SB-209/MW-209 will be incorporated into a supplemental site investigation work plan.

- *PFAS [per- and polyfluoroalkyl substances]: 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 two additional off-site monitoring wells and one year of monitoring did not alter that previous determination.*

NOC Response

Based on the PFAS groundwater sampling data collected from the former Mirro Plant No. 9 monitoring well network, PFAS in groundwater have been delineated on-site and concentrations are stable. As discussed in the 2024 *Site Investigation Report Addendum*, Ramboll acknowledges detections of PFAS above proposed WDHS recommended standards in groundwater samples collected both on- and off-site; however, PFAS in groundwater above proposed WDHS recommended standards are found in both hydrogeologically upgradient (MW-226 and MW-228) and side-gradient (AMEC MW-14, AMEC MW-15, AMEC MW-17, MW-217, and MW-218) monitoring wells, which demonstrates that off-site upgradient PFAS sources exist.

Notably, potential off-site PFAS sources are located near the site in the upgradient, side-gradient and downgradient directions (e.g., National Tinsel Manufacturing Company; Wisconsin Aluminum Foundry Company, Inc.; Gaterman Manufacturing Company, Inc.; and Heresite Protective Coatings, LLC; among others) and could be causing or contributing to the low PFAS concentrations detected downgradient of the site (Attachment A). This is evidenced by the varying PFAS concentrations in monitoring wells MW-226, MW-235, and MW-236. Given the presence of off-site upgradient, sidegradient, and downgradient PFAS sources; documented PFAS concentrations in upgradient, side-gradient and downgradient monitoring wells; and the absence of promulgated WAC NR 141 groundwater standards, defining the concentration of PFAS in groundwater off-site to the proposed WDHS recommended standards is not practicable.

Ramboll has defined the extent of PFAS impacted groundwater on-site. And for the reasons stated above, Ramboll recommends that no additional off-site groundwater investigation activities be required at this time.

- *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.*

NOC Response

Ramboll completed an additional review of the televising video files of the segment of the storm sewer tunnel traversing beneath the site. Based on the review of the video files, no sediment was observed, and, as such, no sediment is available for sampling. As such, Ramboll recommends that no sediment sampling be required in the storm sewer tunnel beneath the site.

As part of the WDNR letter, WDNR requests the submittal of a supplemental site investigation work plan within 60 days of April 3, 2024; however, Ramboll is requesting WDNR's written response on the items discussed in this RTC letter prior to preparation of a supplemental site investigation work plan. Ramboll would be amenable to discussing any of these items further with WDNR, if WDNR would find that helpful. A



completed Technical Assistance Request (Form 4400-237) and associated review fee will be provided concurrent with submittal of the supplemental work plan.

Yours sincerely,

Paul Lindquist

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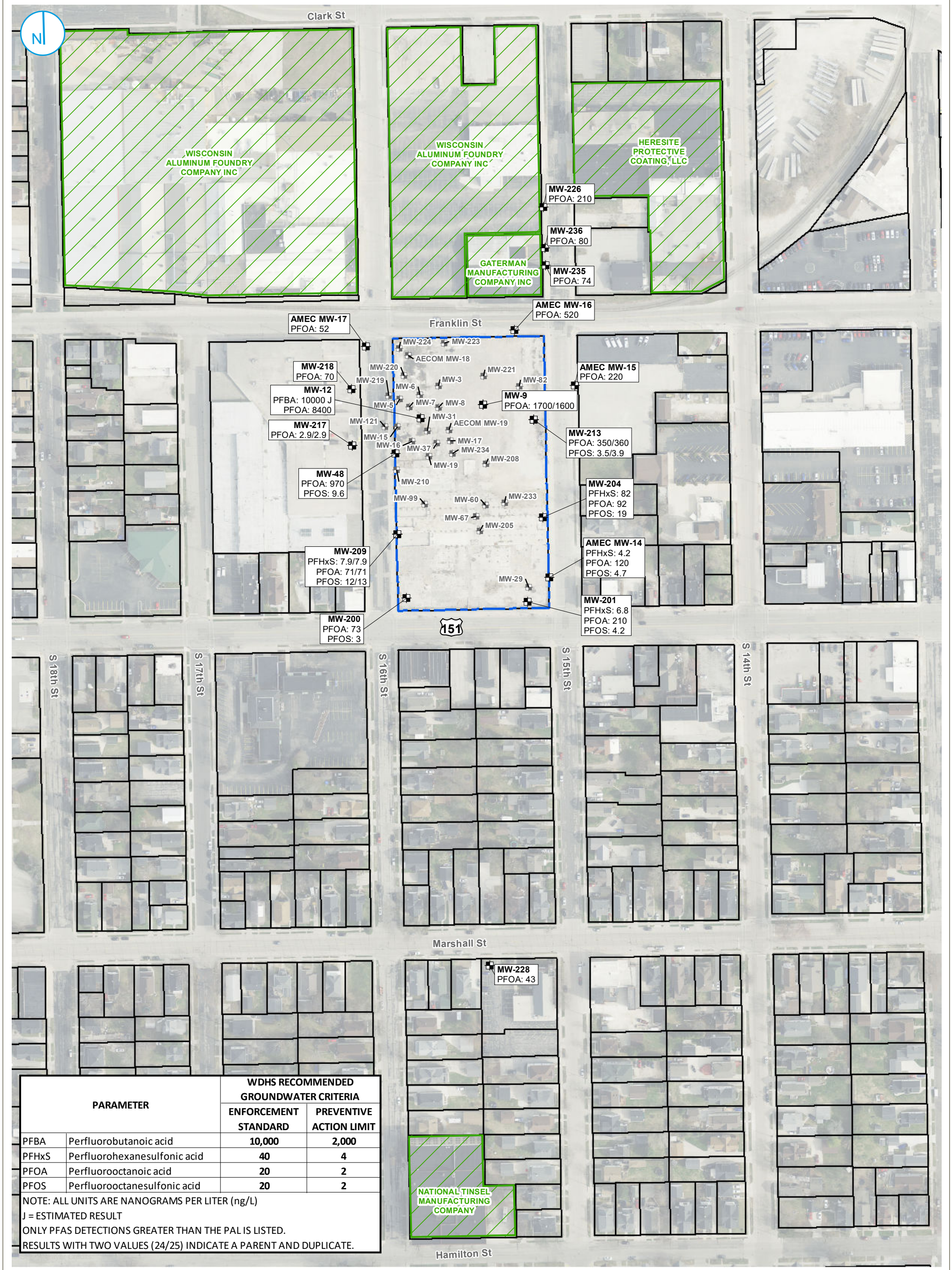
cc: Kristin Jones, NOC (electronic copy)
Adam Tegen, City of Manitowoc Community Development Authority (electronic copy)
Harris Byers, Stantec (electronic copy)

Enclosures

Attachment A: PFAS in Shallow Groundwater July 2023



ATTACHMENT A
PFAS IN SHALLOW GROUNDWATER JULY 2023



PARAMETER		WDHS RECOMMENDED GROUNDWATER CRITERIA	
		ENFORCEMENT STANDARD	PREVENTIVE ACTION LIMIT
PFBA	Perfluorobutanoic acid	10,000	2,000
PFHxS	Perfluorohexanesulfonic acid	40	4
PFOA	Perfluorooctanoic acid	20	2
PFOS	Perfluorooctanesulfonic acid	20	2

NOTE: ALL UNITS ARE NANOGRAMS PER LITER (ng/L)
 J = ESTIMATED RESULT
 ONLY PFAS DETECTIONS GREATER THAN THE PAL IS LISTED.
 RESULTS WITH TWO VALUES (24/25) INDICATE A PARENT AND DUPLICATE.

- ☒ MONITORING WELL LOCATION
- ☒ MONITORING WELL NOT SAMPLED
- ▭ PROPERTY BOUNDARY
- ▭ FORMER/CURRENT INDUSTRIAL PROPERTIES
- ▭ PARCEL BOUNDARY

0 90 180
 Feet

**WDHS RECOMMENDED GROUNDWATER CRITERIA
 PFAS IN SHALLOW GROUNDWATER
 JULY 2023**

ATTACHMENT A

DRAFT

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS

RESPONSE TO WDNR COMMENT LETTER
 FORMER MIRRO PLANT NO. 9
 MANITOWOC, WISCONSIN

