From: Beggs, Tauren R - DNR
Sent: Thursday, August 9, 2018 8:44 AM
To: 'david.decourcybower@erm.com'
Cc: Podlaski, Rick (Rick.Podlaski@thermofisher.com)
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Good morning David,

I went over the data and information for the Hamilton Industries and Suettinger Property with the closure committee late last week.

The northeast building (west of MW-9) on the Suettinger Property is two stories with a basement. Per the Phase I ESA, it was historically used as a fish market, ice cream store and confectionery store prior to 1985. In 1985, the northeast building was used for small engine repair. A chlorinated solvent source was not identified in this area as part of the environmental assessment. As documented in the Phase I ESA, the Suettingers conducted small engine repair on the first floor of the building. They initially used Naptha for cleaning parts and soon switched to a biodegradable detergent parts cleaner. The area contains a wood floor and a basement exists beneath the first floor. There is a general staining of the entire wood floor and there isn't additional staining of the wood floor in the northeast corner. Waste oil was collected and burned off-site in a fuel oil burner. There was an empty 250 gallon fuel oil AST in the basement. The former car service area that operated from 1946-1958 could potentially have used solvent parts cleaner, but this area is in the southern portion of the Suettinger building west of MW-22S, of which there is a southwest groundwater flow. There is a shift in groundwater flow direction near Jefferson St as shown by the City of Two Rivers limited Phase II ESA and the most recent groundwater flow map that you have provided. Unless evidence of a source is later found on the Suettinger Porperty, the DNR will be leaving the data as is with the Hamilton Industries case.

Per an update from the City of Two Rivers, the Suettinger Property has been acquired by the City for the purpose of blight elimination. The Suettinger property building is vacant. A developer the City is working with has acquired the two residential properties adjacent to the Suettinger property. The residences are being or have already been vacated. All these buildings are planned to be demolished for redevelopment of a hotel. The City is hoping the demolition will be completed sometime in October this year.

Degree and extent in this area is defined. Since the buildings are all vacated, there is no need to sample sub-slab vapors under the Suettinger building or the two residences. The City and the developer they are working with have been notified to take the proper precautions with respect to potential vapor intrusion by including vapor assessment and/or vapor mitigation in their new construction of the hotel.

Regards,

Tauren R. Beggs
Phone: (920) 662-5178
Tauren.Beggs@wisconsin.gov

From: David De Courcy Bower [mailto:david.decourcybower@erm.com]
Sent: Thursday, July 26, 2018 3:41 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Cc: Podlaski, Rick <Rick.Podlaski@thermofisher.com>
Subject: Re: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Tauren,

Thank you for sending over the Phase II communications earlier today. I wanted to provide an update on the results of the latest round of site investigation for the Two Rivers Site.

To summarize the email chain below, based on the WDNR informal review of the Site Investigation Report submitted in February 2018 there were four main comments. ERM completed additional investigation activities at the Site to further evaluate these areas.

- *Delineation of benzene in shallow soil at MW-11S. Doesn't appear to be impacting groundwater. Area formerly a parking lot.*

  On June 7, 2018 ERM advanced four soil borings: one boring at 10- feet north of MW-11S (SB-1) and one boring located 5-feet north of MW-11S (SB-2). ERM advanced two additional borings, one located 5-feet south of MW-11S (SB-3) and one boring located 10-feet south of MW-11S (SB-4). The shallow soils were documented to be fill materials to approximately 4 feet bgs. ERM collected soil samples at 3-feet below ground surface. Samples from the two closest boring locations (SB-2 and SB-3) were analyzed and indicated no detectable concentrations of petroleum related VOCs, including benzene. This investigation indicates that the petroleum-related constituents found in soil sample SB-11S is very limited in extent. As there currently is an asphalt cap over the area where the benzene concentration occurs, the soil-to-groundwater pathway is incomplete. ERM therefore recommends no further action for the benzene at this location.

- *Delineation of non-industrial direct contact exceedances, benzo(a)pyrene found above direct contact in LSB-2 and LSB-4*

  ERM has completed an evaluation of PAH concentrations using the NR722_cPAHs_Evaluator as described in DNR publication: RR-087. The results of the evaluation determined that cPAH levels are below direct-contact concern. The results of this evaluation will be included in a revised Site Investigation Report that will include a formal review fee. ERM therefore recommends no further action for the PAHs.

- *Delineation of VAS-24 area and confirmation of initial PAL exceedance in groundwater, not likely a large source in this area; primary operations of the site are further south where higher concentrations were found in groundwater.*

  On June 7, 2018 ERM installed groundwater monitoring well MW-23S. During installation soil samples were collected at 2.5 ft bgs and 5 ft bgs and analyzed for VOCs. The only VOC detected was Trichloroethene (TCE) at a concentration of 0.137 mg/kg at 2.5 ft bgs but was not detected

in the sample at 5 ft bgs. Following installation, the well was developed and sampled on June 20, 2018. TCE was detected at a concentration of 4.9 ug/l (5.2 ug/l in the duplicate sample). Based on this data, the presence of low-level concentrations of TCE in groundwater at concentrations around the WNDR Enforcement Standard were detected at this location. ERM recommends an additional round of sampling from the well to confirm these detections.

- *Potential vapor concerns from the southern groundwater plume, bar located on the corner of Jefferson and East River St.*

As discussed below, no additional sampling of the bar was required due to the pending demolition of the bar by the City of Two Rivers.

ERM also completed a site-wide groundwater sampling event on June 19/20th, 2018. Overall the concentrations of TCE in groundwater had declined from previous round of sampling completed in November 2017. The results of the sampling and development of a more comprehensive groundwater flow map (see DRAFT figures attached), indicate that the highest concentrations of TCE in the southern plume are located within MW-09. MW-09 is an up-gradient off-Site well located to the east of the Suettinger Hardware property. The Phase I ESA indicated that "There is a potential that the Hardware Store property is the source of the TCE". The draft figure of groundwater flow direction provided by McMahon for the Phase II misinterpreted the groundwater flow direction due to a limited dataset used. Based on the information available the Suetinger Hardware property is a potential source of the southern TCE plume. Further evaluation of the source of the TCE for the southern plume by the property owner, and soil and soil gas sampling beneath the Hardware store building is recommended due to the elevated concentrations of TCE in MW-09.

Please let me know if you have any questions or comments,

David

David de Courcy-Bower, P.E.
Principal Consultant

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"The Business of Sustainability"

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Friday, April 20, 2018 8:23 AM
To: David De Courcy Bower <david.decourcybower@erm.com>
Cc: Podlaski, Rick <Rick.Podlaski@thermofisher.com>; Marie Venne <Marie.Venne@erm.com>
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi David,

Yes, I am in agreement the soil vapor sampling does not need to be completed anymore since the bar is no longer occupied.

Regards,

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Tauren R. Beggs
Phone: (920) 662-5178
Tauren.Beggs@wisconsin.gov

From: David De Courcy Bower [mailto:david.decourcybower@erm.com]
Sent: Thursday, April 19, 2018 3:33 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; Marie Venne <Marie.Venne@erm.com>
Cc: Podlaski, Rick <Rick.Podlaski@thermofisher.com>
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Tauren,

Thank you for the call earlier in the week. I called James McDonald at the City of Two Rivers. Per the attached email, he confirmed that the City had acquired the former "Blue Goose" tavern located at the intersection of Jefferson and East River Street. Jim also confirmed that the building is currently vacant, and that they intend to demolish the building. Given this, ERM proposes to not complete the soil vapor sampling as proposed in item #4 below and there is no VI risk to the soon to be demolished building.

Could you please confirm that you are in agreement with this approach,

Regards,

David

David de Courcy-Bower, P.E.
Principal Consultant

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"The Business of Sustainability"

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Thursday, March 22, 2018 1:59 PM
To: Marie Venne <Marie.Venne@erm.com>
Cc: David De Courcy Bower <david.decourcybower@erm.com>; Podlaski, Rick <Rick.Podlaski@thermofisher.com>
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi Marie,

This email acts as my notice to proceed with the supplemental information for the work plan with the following comments:

- For investigation of benzene at MW-11S area, I would recommend limited sampling for PVOC + naphthalene, maybe one sample to the north and one to the south within 10-15' of MW-11S at the same depth interval. Since you will have equipment out there for other work, installing a couple quick shallow soil borings on the front end should be pretty minimal additional work and can put to rest any site investigation questions the closure committee may have about that area at the time this case is reviewed for closure, which can save time on the back end.
- I agree a request with fee for cumulative PAH risk assessment can be submitted.
- The approach for the VAS-24 area seems appropriate.
- The soil gas sampling approach seems appropriate. DNR recommends only sampling for the contaminants of concern (chlorinated VOCs) for vapors and collecting the soil gas sample within a few feet above the groundwater table.

FYI – This email does not act as an official approval of the site investigation work plan or site investigation. Approval with a formal written response from DNR can only be provided if the applicable review fee is submitted with the request.

If you have any questions, please feel free to give me a call.

Thanks,

Tauren R. Beggs
Phone: (920) 662-5178
Tauren.Beggs@wisconsin.gov

From: Marie Venne [mailto:Marie.Venne@erm.com]
Sent: Monday, March 19, 2018 3:01 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Cc: David De Courcy Bower <david.decourcybower@erm.com>; Podlaski, Rick <Rick.Podlaski@thermofisher.com>
Subject: RE: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi Tauren, I'm assisting David on the Former Hamilton Industries Site in Two Rivers. ERM proposes the following supplemental work to address the four questions you had last Monday (the 5th) after reviewing the Additional Site Investigation Report and speaking to David on the phone.

1. *Delineation of benzene in shallow soil at MW-11S.*
    a. The shallow soil sample results collected at 3 feet below ground surface (ft bgs) at MW-11S did not exceed the direct contact residual contaminant levels (RCLs), but did exceed the soil-to-groundwater RCL for benzene. However, there were no detections of any constituents in the deeper soil sample collected at 10 ft bgs. Furthermore, no evidence of staining or odors were noted and photoionization detector (PID) readings were 0.2

parts per million (ppm) or less in soil boring VAS-5. Additionally, neither benzene nor any other petroleum compounds were detected in any of the Site groundwater wells. Given that MW-11S is located in an asphalt parking lot, the shallow petroleum related detections are most likely attributed to incidental leaks, drips and spills from parked vehicles and the asphalt surface rather than a larger source, and deeper soil and groundwater results indicate that shallow detects are not impacting the groundwater. Therefore, ERM believes these detections are sufficiently delineated and no further delineation is warranted at this time.

2. *Delineation of non-industrial direct contact exceedances of benzo(a)pyrene in LSB-2 and LSB-4.*
    a. Given the low detection levels of petroleum related compounds in these borings, ERM proposes to evaluate these results using a risk based approach by evaluating carcinogenic polycyclic aromatic hydrocarbons (cPAHs) on a cumulative basis as outlined in WDNR guidance RR-079 and RR-087. If the detected concentrations exceed the cumulative non-industrial direct contact RCLs, ERM will propose additional work to delineate these detections. To facilitate this approach, we will submit a Request for Technical Assistance (Form 4400-237) and associated fee for the cPAH evaluation.
3. *Delineation of VAS-24 area and confirmation of initial PAL exceedance in groundwater.*
    a. Trichloroethylene (TCE) was detected at 1.8 ppm in the groundwater sample collected at 10.5 ft bgs in VAS-24, but was not detected in deeper groundwater samples. Upgradient (VAS-23) and side-gradient (VAS-20/MW-19S) groundwater samples did not detect TCE. ERM proposes to install a well at VAS-24 to confirm the presence of TCE at concentrations above the PAL. If TCE is detected in the monitoring well, ERM will propose additional work to delineate the extent of the TCE in groundwater.
4. *Potential vapor concerns from the southern groundwater plume to the bar located on the corner of Jefferson and East River Street.*
    a. ERM proposes to install and sample one soil gas probe between the building on the corner of Jefferson and East River Street and the groundwater plume to assess the potential for vapor intrusion risk to the building. The sample will be collected and evaluated in accordance with WNDR guidance RR-800.

If you concur, this email will be a supplement to the previously submitted work plan and ERM will complete the activities outlined above in addition to commencing quarterly groundwater sampling for CVOCs as recommended in the Additional Site Investigation Report. Based on the results of the work (Items 1 through 4), ERM will prepare a Remedial Action Options Report to address impacts at the site.
Regards,
Marie

Marie Venné, PE
Senior Engineer

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From: Beggs, Tauren R - DNR [mailto:Tauren.Beggs@wisconsin.gov]
Sent: Monday, March 05, 2018 3:19 PM
To: David De Courcy Bower <david.decourcybower@erm.com>
Subject: Additional Site Investigation Report Call Summary, Former Hamilton Industries Site

Hi David,

It was nice talking through this site with you today. To summarize our call, there were four items I had questions about for the investigation:

- Delineation of benzene in shallow soil at MW-11S. Doesn't appear to be impacting groundwater. Area formerly a parking lot.
- Delineation of non-industrial direct contact exceedances, benzo(a)pyrene found above direct contact in LSB-2 and LSB-4
- Delineation of VAS-24 area and confirmation of initial PAL exceedance in groundwater, not likely a large source in this area; primary operations of the site are further south where higher concentrations were found in groundwater.
- Potential vapor concerns from the southern groundwater plume, bar located on the corner of Jefferson and East River St.

I think that covers what we discussed. If you have any questions, please feel free to contact me.

Thanks,

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