



April 25, 2019

Mr. Robert Fetter
Thermo Fisher Scientific
168 Third Avenue
Waltham, MA 02451

SUBJECT: Review of Site Investigation and cPAH Assessment
Hamilton Industries Site (Former), 1316 18th Street, Two Rivers, Wisconsin
DNR BRRTS #: 02-36-578316

Dear Mr. Fetter:

On March 8, 2019, the Department of Natural Resources (DNR) received the *Site Investigation Report Addendum*, dated February 2019, including a cumulative carcinogenic polycyclic aromatic hydrocarbon (cPAH) assessment and Wis. Admin. Code ch. NR 749 review fee, for the above referenced site. This report was prepared by Environmental Resources Management (ERM) and submitted to the DNR on your behalf. Revised cPAH assessment tables and soil analytical tables were provided via email on April 11, 2019 and a revised signature page was submitted via email on April 24, 2019.

Additional Investigation

The site investigation, in accordance with Wis. Admin. Code ch. NR 716, is not considered complete. Additional investigation is needed in order to define degree and extent of contamination. Please refer to the attached Figure 4, Investigation Boring Location Map, January 21, 2019, for current sampling locations.

Additional VOC Investigation

- Additional soil and groundwater investigation need to be completed around the MW-23S/VAS 24 sampling location for volatile organic compounds (VOCs). The specific contaminants of concern in that area are chlorinated VOCs. A work plan should be provided for DNR review within the next 30 days.

Off-Site Petroleum LNAPL Investigation

- A petroleum light non-aqueous phase liquid (LNAPL) was detected at off-site monitoring well location MW-2 on property owned by the City of Two Rivers. This area is being further evaluated by the City of Two Rivers since no petroleum discharge was identified on the property owned by Thermo Fisher adjacent to MW-2 during the site investigation. Therefore, no additional actions are required in this area by Thermo Fisher at this time.

cPAH Assessment

A cPAH assessment was completed per Wis. Admin. Code § NR 722.11(1) for polycyclic aromatic hydrocarbons (PAHs) identified at soil sampling locations LSB-2 and LSB-4. There were individual exceedances of benzo(a)pyrene above the non-industrial direct contact residual contaminant levels

(RCLs) at both locations. The evaluation of cPAH risk did not exceed cumulative cancer risk levels. Based on this evaluation and soil and groundwater sampling for PAHs from LSB-1 to LSB-4, no further investigation is required for PAHs.

Documentation Revisions

The following revisions are needed for future submittals:

- A figure depicting the area of residual soil contamination needs to be included in future document submittals.
 - It should be indicated on the residual soil contamination figure that the cPAH assessments conducted for the LSB-2 and LSB-4 soil sample locations did not exceed the cumulative cancer risk levels.
- VAS groundwater sample locations should be included on groundwater isoconcentration figure(s) in future document submittals since they provide important data for delineating degree and extent of contamination.

If you have any questions, please feel free to contact me at (920) 662-5178 or at Tauren.Beggs@wisconsin.gov.

Sincerely,

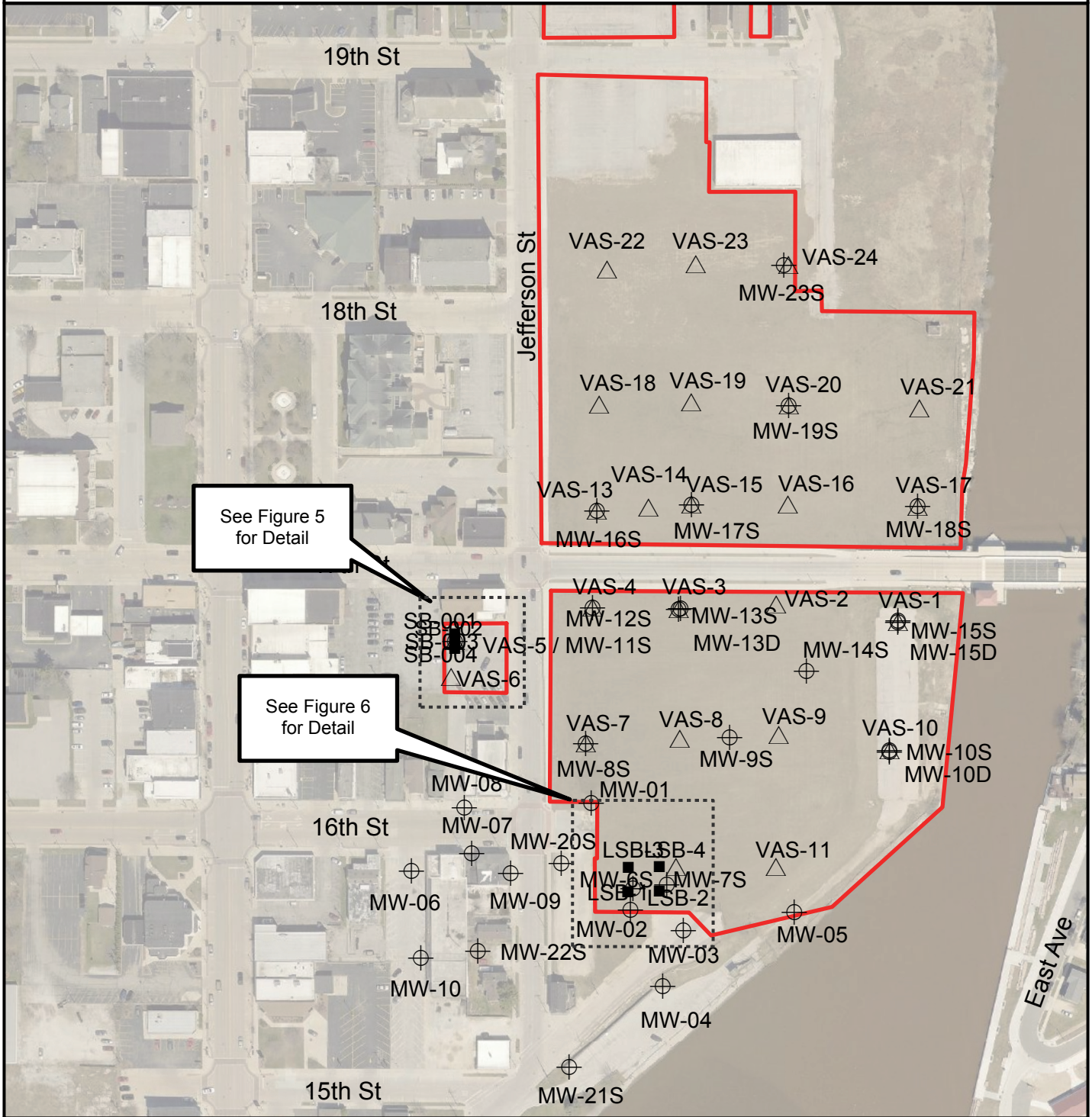


Tauren R. Beggs
Hydrogeologist
Remediation & Redevelopment Program

Attachment: Figure 4, Investigation Boring Location Map, January 21, 2019

ec: Rick Podlaski, Thermo Fisher Scientific (rick.podlaski@thermofisher.com)
David de Courcy-Bower, ERM (david.decourcybower@erm.com)

INVESTIGATION BORING LOCATION MAP



See Figure 5
for Detail

See Figure 6
for Detail

Legend

- Vertical Aquifer Sample Locations
- Monitoring Well Locations
- Soil Boring Locations
- Property Boundary

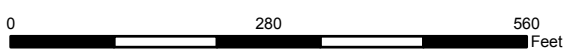


Figure 4

**Former Hamilton Industries
1316 18th Street
Two Rivers, WI**



This information is for environmental review purposes only.

Base map: Manitowish County Orthophoto, 2017.