

From: David De Courcy Bower <david.decourcybower@erm.com>
Sent: Friday, August 23, 2019 4:29 PM
To: Beggs, Tauren R - DNR
Subject: RE: Former Hamilton Industries - Two Rivers, WI

Thank you for the email Tauren.

Have a great weekend.

David

David de Courcy-Bower, P.E.
Partner

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"The Business of Sustainability"

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Friday, August 23, 2019 3:19 PM
To: David De Courcy Bower <david.decourcybower@erm.com>
Subject: RE: Former Hamilton Industries - Two Rivers, WI

Hi David,

I have followed up with Jennifer Borski and she had the following comments in regard to the vapor pathway for this site:

For the Northern Area:

- Identify occupancy and use of the structure off-site to the north.
- Based on groundwater data from MW-23S and MW-25S, DNR currently recommends sub-slab vapor sampling take place at this structure regardless of use or occupancy. Requirements may change based on occupancy and use or continued groundwater monitoring.

Utilities – Sanitary Sewer: Groundwater contamination in area of sanitary sewer utilities/utility laterals

- A figure showing utility locations has not been provided to date. A figure needs to be provided that details the former utilities and utility laterals on and surrounding the site as part of an evaluation of sanitary sewer utilities as a preferential pathway. Attached is a figure I have available. I have reached out to the City of Two Rivers for utility maps, so I am waiting for what they will provide.
 - Identify locations of former sanitary sewer lateral(s) from the source property. Areas with contaminated groundwater intersecting or within close proximity to sanitary sewer lines/laterals and/or historic discharges to sanitary sewer lines can cause preferential pathways for soil, groundwater, and/or vapor contamination.

- The proposed hotel development west of the site and/or other properties surrounding this site could potentially be impacted by vapors off-gassing from groundwater and/or from contaminant migration through sanitary sewer lines and laterals. Sample air within the sanitary sewer main(s) connected to the site lateral(s) to determine if there is a preferential pathway (such as manholes at: corner of Jefferson St and 15th St, on-site along 16th St, intersection of Jefferson St and 16th St, two along 17th St as shown on attached utilities map).
 - Recommended protocols can be found in the Dept. of Defense (DOD) study (Link: <https://www.serdp-estcp.org/Program-Areas/Environmental-Restoration/Contaminated-Groundwater/Emerging-Issues/ER-201505>).

On-Site:

- As outlined previously, vapor/soil gas sampling is not appropriate on the vacant on-site property unless a structure is constructed prior to case closure.

If you have any questions, please let me know.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Beggs, Tauren R - DNR

Sent: Tuesday, August 13, 2019 3:21 PM

To: 'David De Courcy Bower' <david.decourcybower@erm.com>

Subject: RE: Former Hamilton Industries - Two Rivers, WI

Hi David,

I have reviewed the report. The additional investigation in the northern area did detect TCE above the Groundwater Pathway Standard in MW-25S. A PAL exceedance was found in groundwater at that location. Some minimal soil sampling should be completed west and north of MW-25S. It doesn't appear any additional groundwater monitoring wells would be warranted in this northern area unless additional soil sampling finds a larger issue. A brief work plan should be submitted for this additional work.

To the north of MW-25S appears to be a parcel under different ownership with a building located on it. Was this building associated with the Thermo Fisher facility? What is the current use of this building or is it not being used? To date, besides the new hotel development west/southwest of this property, which I am currently having conversations with the developer how to assess and prevent vapor issues with their upcoming new construction, there appears to be no scenarios at this site where vapor sampling has been warranted per the screening guidelines in DNR Vapor Intrusion Guidance Document RR-800 (no buildings over or within 100 ft of chlorinated volatile organic compound (CVOC) impacted soil, no buildings overlying groundwater with CVOCs above the enforcement standard, no groundwater with CVOCs above a preventive action limit in contact with a building, and no preferential pathways such as utilities). The parcel north of MW-25S does have a building within 100ft of impacted soil. You will need

to provide justification as to why vapor sampling will be needed or not for this building. I plan to discuss this with the DNR vapor expert, Jennifer Borski, to get some feedback from her.

One other comment for soil and groundwater in your report: The soil and groundwater data from sampling completed by the City of Two Rivers should be included in the site investigation report data, tables, and figures since this data is important for the southern portion of the site investigation for this site. All the information is available electronically in BRRTS within this case. Include the following data from: the soil stockpile split sampling, soil and groundwater sampling from GP-1 to GP-3, and soil and groundwater sampling from MW-1 to MW-5 (recorded in BRRTS on 2/22/2017), and the soil and groundwater sampling for MW-6 to MW-9 (analytical reports recorded in BRRTS on 4/11/2018). I don't believe the initial round collected by the City for groundwater from the MW-1 to MW-9 wells have been incorporated into the site investigation report.

If you have any questions, please let me know.

Regards,

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

Tauren.Beggs@wisconsin.gov

From: Beggs, Tauren R - DNR

Sent: Friday, August 2, 2019 7:19 AM

To: 'David De Courcy Bower' <david.decourcybower@erm.com>

Subject: RE: Former Hamilton Industries - Two Rivers, WI

Thanks for the update David! I will grab the electronic copy and take a look at the report. Please submit a paper copy if you haven't already.

Have a nice weekend!

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

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From: David De Courcy Bower <david.decourcybower@erm.com>

Sent: Wednesday, July 31, 2019 4:20 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Subject: Former Hamilton Industries - Two Rivers, WI

Tauren,

I have uploaded a letter report that provides updated quarterly sampling data for the monitoring wells, the results of the additional investigation to the north of the site, and figures showing soil sampling locations and the extent of soil impacts. The scope of work was prepared in response to the WDNR Review of Site Investigation and cPAH Assessment dated April 25, 2019.

Based on the additional work completed, ERM believes that the further investigation conducted in May and June 2019 concludes the investigative stages of Former Hamilton Industries Site, BRRTS Activity #02-36-578316.

Let me know if you have any questions,

David

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

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From: WI DNR <no-reply@wisconsin.gov>
Sent: Wednesday, July 31, 2019 4:14 PM
To: David De Courcy Bower <david.decourcybower@erm.com>
Subject: 0236578316 : Other

Dear David de Courcy-Bower,

Your document has been successfully uploaded.

Please do not reply to this email.

Confirmation #: 4607663947

BRRTS #: 0236578316

Name: *David de*

Company/Organization: *ERM*

Site Name: *HAMILTON INDUSTRIES SITE (FORMER)*

Please send a paper copy of your submittal to your assigned Project Manager. Please see the [DNR Staff Directory](#) to find your project manager's address.

A submittal is not considered complete until the fee (if applicable), paper and electronic copy of the document or report are received, per Wis. Admin. Code § NR 749.04 (1) and § NR 700.11 (3g) respectively.

For more information please see the [Guidance for submitting Document to the Remediation and Redevelopment Program\(RR-690\)](#)

If you have any questions, please contact:

DENISE DANELSKI
denise.danelski@wisconsin.gov
920-662-5494

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