

**From:** David De Courcy Bower <david.decourcybower@erm.com>  
**Sent:** Friday, June 18, 2021 3:47 PM  
**To:** Beggs, Tauren R - DNR; John Roberts  
**Cc:** Podlaski, Rick  
**Subject:** RE: Couple Clarifications for Site Status and Remedial Action Options Report, Hamilton Industries Site (Former)  
**Attachments:** BRRTS Activity #02-36-578316 FINAL EC Memo\_6-18-2021.pdf

Tauren,

Please see attached the emerging contaminants review letter as a supplemental to the Site Status and RAOR.

Please let us know if you have any questions,

David de Courcy-Bower  
Partner  
Pronouns: He/Him/His

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Thursday, May 20, 2021 11:11 AM  
**To:** John Roberts <[John.Roberts@erm.com](mailto:John.Roberts@erm.com)>; David De Courcy Bower <[david.decourcybower@erm.com](mailto:david.decourcybower@erm.com)>  
**Subject:** RE: Couple Clarifications for Site Status and Remedial Action Options Report, Hamilton Industries Site (Former)

Good morning,

I have started reviewing the report and in Section 1.1 Site Investigation, you request a Site Investigation Complete Determination in addition to the request for approval of the remedial action option you selected. Emerging contaminant (EC) scoping is part of the Wis. Admin. Code ch. NR 716 site investigation process, so as of right now with the information I have, the site investigation will not be approved since there is no emerging contaminant scoping. If you would like DNR to be able to determine whether the site investigation is complete as part of this fee review, the emerging contaminant scoping will have to be provided. You may submit the emerging contaminants review letter separately as a supplemental document to the Site Status and Remedial Action Options Report, then the DNR will review both documents to determine if the site investigation is complete. Please let me know what you decide to do.

Regards,

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**Tauren R. Beggs**

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[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

**Memo**

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**To** Tauren Beggs

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**From** David de Courcy-Bower and John Roberts

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**Date** 18 June 2021

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**Reference** 0383990

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**Subject** Former Hamilton Industries Property, Two Rivers, Wisconsin  
BRRTS Activity #02-36-578316

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Dear Mr. Beggs

Per the email received on May 20, 2021 and the Wisconsin Department of Natural Resources (WDNR) letter dated August 17, 2020, ERM has reviewed available information regarding the past use of per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane at the site located at 1316 18th Street, Two Rivers, Wisconsin (Site) BRRTS Activity #02-36-578316. A summary of the information is provided in this memorandum and although no significant historical use of PFAS and 1,4-dioxane was associated with the manufacturing operations at the Site, operation of the facility for storage and incineration of hazardous wastes included accepting wastes from other facilities from 1974 to 1987. Based on this operation, the conclusion is that there is some uncertainty regarding the presence or absence of PFAS and 1,4-dioxane at the Site.

**Introduction**

Per Wisconsin Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, it is the responsibility of Responsible Parties (RPs) to evaluate hazardous substance discharges and environmental pollution. This includes an evaluation of PFAS compounds, 1,4-dioxane, and other applicable emerging contaminants that were historically or are presently produced, used, handled, or stored at the Site.

ERM evaluated available information to determine 1) whether any products containing emerging contaminants were used in historical operations, 2) the duration of use, and 3) any areas of the Site where emerging contaminants may have been used, stored, managed, or discarded.

**Site Description and History**

The Site began operation in 1880 as a furniture manufacturing facility. During World War I, the facility was reportedly involved in the manufacture of airplane fuselages. Radio cabinets were produced through the 1920's. From the 1930's until the late 1960's the Site manufactured washing machines and dryers. During World War II, the facility reportedly manufactured ammunition boxes. By the 1960's the facility manufactured folding tables, over-bed tables, wire carts, shelving, stretchers and medical devices. Steel furniture fabrication was discontinued in the late 1980's. The facility was closed in 2016 and subsequently demolished. The Site currently


consists of vacant grassed areas or parking lots, with the exception of one approximately 300-square foot brick building

### **Notable Operations**

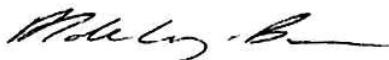
The former Hamilton Industries facility historically incinerated waste solvents, paints, and crankcase oils in the on-Site boiler as an additional energy source and as a way to dispose of these wastes. Flammable liquid hazardous waste was incinerated at the facility from 1974 until 1987. The facility accepted off-Site sources of flammable liquids from businesses in the Green Bay, Appleton and Milwaukee areas. A RCRA Part A permit application was submitted to the U.S. Environmental Protection Agency (EPA) in 1982 and a RCRA Part B permit was granted. The WDNR issued the property a Hazardous Waste Facility Interim License on October 7, 1982 for storage and incineration of hazardous waste materials (flammable liquids). In 1986, a RCRA Part B permit was approved to allow for storage of wastes on-Site for greater than 90 days. In 1983 and 1985, the Site reported 564,285 and 674,000 pounds of hazardous wastes were incinerated each year respectively, with the majority from off-Site sources. The flammable liquid hazardous waste incineration operations had stopped by 1987 and RCRA closure was completed in 1988. Facility maps indicate that Building 5, located just north of 17th Street, was formerly used as the waste solvent / hazardous waste storage building.

### **Conclusions**

The operations at the Site were primarily manufacturing of wood furniture and steel appliances. No documentation reviewed indicated significant use of emerging contaminants such as PFAS and 1,4-dioxane as part of Site manufacturing operations. The property was formerly used for hazardous waste incineration as an alternate boiler fuel source from 1974 until 1987, with the majority of the waste from off-Site locations. Due to the waste operations, there is some uncertainty regarding the presence or absence of PFAS and 1,4-dioxane at the Site.



John Roberts  
Principal Consultant



David de Courcy-Bower  
Partner