

**From:** Beggs, Tauren R - DNR  
**Sent:** Friday, July 16, 2021 10:44 AM  
**To:** Fetter, Robert H.  
**Cc:** David De Courcy Bower; John Roberts; Podlaski, Rick  
**Subject:** Remedial Action Options Approved and Site Investigation Not Approved Letter for Hamilton Industries Site (Former), BRRTS # 02-36-578316  
**Attachments:** 20210716\_40\_RAOR\_Appr\_140\_SIR\_Not\_Appr.pdf

Hi Robert,

Attached is the Remedial Action Options Approved and Site Investigation Not Approved Letter for the above referenced site. If you would like a paper copy of the letter, please let me know. If you have any questions in regard to the letter, please let me know.

Regards,

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**Tauren R. Beggs**

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July 16, 2021

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

SUBJECT: Review of the Site Status Report and Remedial Action Options Evaluation  
Hamilton Industries Site (Former), 1316 18<sup>th</sup> Street, Two Rivers, WI  
BRRTS #: 02-36-578316, FID #: 436034060

Dear Mr. Fetter:

On May 11, 2021, the Wisconsin Department of Natural Resources (DNR) received the Site Status Report and Remedial Action Options Evaluation (Report) prepared on your behalf by David de Courcy-Bower of Environmental Resources Management, Inc. (ERM). The Report was submitted with a fee for DNR review and response for the site investigation and selected remedial action option. The submittal of a Site Investigation Report (SIR) is required per Wis. Admin. Code § NR 716.15. In order to review if the site investigation was complete, an emerging contaminant scoping evaluation needed to be provided. The DNR requested the scoping evaluation on May 20, 2021 and received it from ERM on June 18, 2021.

The Report was reviewed for compliance with Wis. Admin. Code ch. NR 716 and Wis. Admin. Code ch. NR 722. DNR determined that additional work is needed to meet the requirements of Wis. Admin. Code ch. NR 716 to complete the site investigation, and the selected option of an injection can be implemented once a remedial design report (RAP) with injection request is submitted to the DNR.

### **Site Investigation Not Approved**

After reviewing the Report and all case file information submitted to date, the DNR has determined that additional work is necessary to complete the site investigation. The degree and extent of contamination at the site has not been adequately defined and documented with respect to Wis. Admin. Code ch. NR 716. The findings and interpretations by the DNR regarding the incomplete site investigation are summarized below:

#### Scoping the Site Investigation

Wis. Admin. Code § NR 716.07 requires responsible parties to evaluate all of the relevant items in Wis. Admin. Code §§ NR 716.07(1) – (12) to ensure that the scope and detail of the field investigation is appropriate to the complexity of the site or facility. Specifically, a complete evaluation has not been provided to the DNR for the history of the site that may have been associated with hazardous substance discharges or environmental pollution and environmental media that could be affected or potentially affected by the contamination.

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### Contaminant Evaluation

To date, only VOCs and limited metals and polycyclic aromatic hydrocarbons (PAHs) sampling has been completed at the site based on information provided in the discharge notification from 2016 and unknown degraded petroleum product found in one monitoring well during the investigation. The upland investigation for VOCs is considered complete for soil, groundwater, and vapor. Additional information shall be provided to determine whether additional sampling of VOCs, metals and/or PAHs, and/or sampling of other, previously un-sampled contaminants is needed for the investigation. Any previous Phase I Environmental Site Assessment (ESA) that may have been completed should be provided with your evaluation.

The additional contaminant evaluation required is based on known information provided in the emerging contaminant scoping evaluation submitted to the DNR on June 18, 2021, the source of known VOC contamination primarily found on-site in the area of former hazardous waste storage and incineration where a variety of hazardous waste sources were accepted from many different businesses, and documentation provided to the DNR's Waste Program. Documentation provided to the DNR's Waste Program included information regarding generation of F009 waste, which indicates electroplating occurred at the site, additional details on the hazardous waste storage and incineration within the buildings and boilers adjacent to 17<sup>th</sup> Street, the identification of a significant number of transformers and capacitors containing polychlorinated biphenyls (PCBs) throughout the facility, and pre-demolition sampling results of impacted building materials.

### Environmental Media Evaluation

Wis. Admin. Code § NR 716.07(4) requires an evaluation of all environmental media affected or potentially affected by the contamination. An evaluation of surface water and sediment media has not been provided to the DNR. Based on the investigation conducted so far and the proximity to the East Twin River, an evaluation for these media is needed. The evaluation should include additional information of sheet pile wall construction and reconstruction and any other applicable information such as outfalls that may pertain to former site operations.

Based on the site investigation scoping, and contaminant and environmental media evaluation results, additional site investigation may be required under Wis. Admin. Code ch. NR 716.

### Emerging Contaminant Sampling

Emerging contaminant sampling for PFAS and 1,4-dioxane is required. This determination was made based on the emerging contaminant evaluation submitted to the DNR on June 18, 2021 and existing DNR case file information.

Based on the emerging contaminant sampling analytical results, additional site investigation may be required under Wis. Admin. Code ch. NR 716.

### **Remedial Action Options Approval**

The DNR reviewed the remedial action options per Wis. Admin. Code ch. NR 722 and has determined that the selected option of an injection can be implemented once a remedial design report (RAP) with injection request is submitted to the DNR. The selected option only applies to the central VOC plume on the site at this time since it is proposed to address trichloroethylene (TCE) concentrations greater than 500 ug/l. The effectiveness of the remedy and whether additional remedy may be needed for the areas less than 500 ug/l in the central, southern, and/or northern plumes will be based on further groundwater monitoring. Additional monitoring locations may be necessary based on post-remedial sample results. Additional remedy within the central VOC plume area or in other areas on-site may be needed based on the effectiveness of the proposed remedy, further groundwater monitoring, and/or if additional contaminants are identified that would require a reduction in contaminant mass and concentration.

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It was indicated that the RAP will be submitted to the DNR for formal review, which would include a \$1,050 review fee. A request for an injection permit will need a separate review fee of \$700.

### Documentation and Schedule

In consideration of administrative code requirements, the DNR is requesting implementation of the following site investigation schedule:

- Per Wis. Admin. Code § NR 716.09(1), the DNR is requesting the submittal of a supplemental site investigation work plan within 60 days of the date of this letter. This work plan should include the evaluations required under Wis. Admin. Code § NR 716.07. The work plan must comply with Wis. Admin. Code § NR 716.09(2). A fee is recommended for DNR review and response.
- Per Wis. Admin. Code § NR 716.11(2g), the additional site investigation activities must begin within 90 days of the submittal of the work plan.
- Per Wis. Admin. Code § NR 716.14, all sampling results are required to be submitted within 10 days of receiving the laboratory data.
- Per Wis. Admin. Code § NR 716.15(1), a supplemental site investigation report shall be submitted within 60 days after completion of the field investigation. A fee is recommended for DNR review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

The RAP will be submitted in accordance with Wis. Admin. Code ch. NR 724. Since a DNR response is being provided under Wis. Admin. Code § NR 722.15(3), design and construction of the selected remedial action shall be initiated within 90 days of the date of this letter. Once the additional site investigation and remedial action work has been completed and documented, your consultant should evaluate whether additional actions are needed prior to submitting a request for case closure.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-510-3472 or at [Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov).

Sincerely,



Tauren R. Beggs  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Rick Podlaski, Thermo Fisher Scientific ([rick.podlaski@thermofisher.com](mailto:rick.podlaski@thermofisher.com))  
David de Courcy-Bower ([david.decourcybower@erm.com](mailto:david.decourcybower@erm.com))