From: Beggs, Tauren R - DNR
Sent: Wednesday, May 4, 2022 2:32 PM
To: rick.podlaski@thermofisher.com
Cc: Fetter, Robert H.; 'david.decourcybower@erm.com'; John Roberts
Subject: Technical Assistance Request Response for Hamilton Industries Site (Former), BRRTS # 02-36-578316
Attachments: 20220504_98_Tech_Assist_Provide.pdf

Hi Rick,

Attached is the electronic version of the Technical Assistance Response letter to your request received by DNR on March 18, 2022. Please let me know if you want a paper copy.

If you have any questions, please feel free to contact me.

Regards,

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Tauren R. Beggs
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Remediation and Redevelopment Program
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DEPARTMENT OF NATURAL RESOURCES
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Preston D. Cole, Secretary
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Toll Free 1-888-936-7463
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May 4, 2022

Thermo Fisher Scientific
Attn: Rick Podlaski
P.O. Box 17340
Stamford, CT 06907
Via Electronic Mail to *rick.podlaski@thermofisher.com*

Subject: Response to Technical Assistance Request – Contaminants of Concern and Media Evaluation
Hamilton Industries Site (Former)
1316 18th Street, Two Rivers, WI 54241
BRRTS #: 02-36-578316

Dear Mr. Podlaski:

This letter is written in response to a Technical Assistance (TA) Request for a contaminants of concern and media evaluation that was included as part of the *October and November 2021 Additional Groundwater and Soil Investigation* memorandum (Memorandum) submitted on your behalf by Environmental Resources Management (ERM). The request was received by the Wisconsin Department of Natural Resources (DNR) on March 18, 2022, with the $700 review fee as required by Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1). The purpose of this letter is to provide a response to the TA request for DNR concurrence of the contaminants of concern scoping and media evaluation conclusions by ERM.

Summary Determination

The DNR does not concur with all of the contaminants of concern and media evaluation conclusions in the Memorandum. Specific comments are provided below in the Determination section by contaminant type for the contaminants of concern and for the media evaluation for sediment and surface water. The contaminants sampled at this site include polychlorinated biphenyls (PCBs), per- and polyfluorinated alkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), metals, 1,4-dioxane, and volatile organic compounds (VOCs).

Background

DNR issued a letter, *Review of the Site Status Report and Remedial Action Options Evaluation,* on July 16, 2021, which included a determination that additional work was necessary to complete the site investigation under Wis. Admin. Code ch. NR 716. This determination included the request for additional scoping, contaminant, and media evaluations. In response, ERM submitted the *2021 Work Plan Addendum – Additional Groundwater and Soil Investigation* on September 10, 2021. A site investigation work plan notice to proceed was issued by DNR on September 23, 2021.

The additional investigation work completed in 2021 addressed soil and groundwater sampling. The sediment and surface water evaluation was not completed in 2021 since ERM wanted to complete the additional soil and groundwater sampling first.

Determination

DNR has reviewed the documentation submitted and determined the following (refer to Figure 1, Monitoring Well and Soil Boring Network Map, dated February 8, 2022, for sampling locations):

DNR does not concur with the contaminants of concern scoping and media evaluation conclusions in the Memorandum for:

- PCBs: Two soil samples (SB-06 and SB-07) had groundwater pathway residual contaminant level (RCL) exceedances. Additional soil sampling should be conducted in close proximity to SB-06 and SB-07 to delineate degree and extent of PCB contamination.
- PFAS: Additional sampling is needed before a determination can be made that PFAS is not associated with releases on-site. The highest PFAS concentrations are found where the highest chlorinated VOC concentrations are found. While there are PFAS concentrations upgradient as well, it is not conclusive that PFAS is not a contaminant of concern on-site at this time.
- Media Evaluation - Sediment and Surface Water: The media evaluation for sediment and surface water should be completed for chlorinated VOCs and 1,4-Dioxane, but it should also include justification for all the contaminants sampled for at the site and why those contaminants should or should not be sampled for in sediment and surface water in the adjacent East Twin River.

DNR concurs with the contaminants of concern scoping conclusions in the Memorandum for:

- PAHs: No PAHs were detected in soil for the 2021 sampling event. Previous sampling on-site in 2017 had individual exceedances of PAHs for two samples, but no cumulative risk exceedances (approval for cPAH assessment issued by DNR on April 25, 2019). One j-flag result for benzo(b)fluoranthene was detected slightly above the preventive action limit (PAL) in MW-05; however, no other monitoring wells had detections above groundwater standards, so the DNR does not consider MW-05 to be an exceedance and delineation for a PAL is not needed. No more investigation of PAHs is needed in soil and groundwater, but the PAH data collected for the site investigation needs to be included in documentation submitted at the time closure is requested.
- Metals: Minimal metals sampling in soil in 2016 detected a low concentration of mercury and lead which were not confirmed in duplicate or confirmation sampling. Only chromium or selenium was found in groundwater above a PAL in the total or dissolved state, but not confirmed in both, except for the MW-14S field duplicate sample. Therefore, DNR does not consider these to be PAL exceedances and delineation of the PAL is not needed. No more investigation is needed for metals in soil and groundwater, but the metal data collected for the site investigation needs to be included in documentation submitted at the time closure is requested.
- 1,4-Dioxane: The DNR concurs that the 1,4-Dioxane is associated with the chlorinated VOC plumes and will be included in future sampling.

Although VOCs were not mentioned in the Memorandum conclusions because VOCs were not sampled as part of this 2021 investigation work, DNR acknowledges that VOCs are the primary contaminants of concern for the site and will continue to be sampled for in the future.

Per Wis. Admin. Code § NR 716.09(1), a supplemental site investigation work plan should be submitted within 60 days of the date of this letter. Based on the results, additional investigation may be required.

It should be noted that the two parcels to the north of 19th Street where no samples have been collected are not considered to be part of the site.

The technical assistance request and response can be found in the Bureau for Remediation & Redevelopment Tracking System (BRRTS) on the Web (BOTW), go to dnr.wi.gov, and search "BOTW." Use the BRRTS #

found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

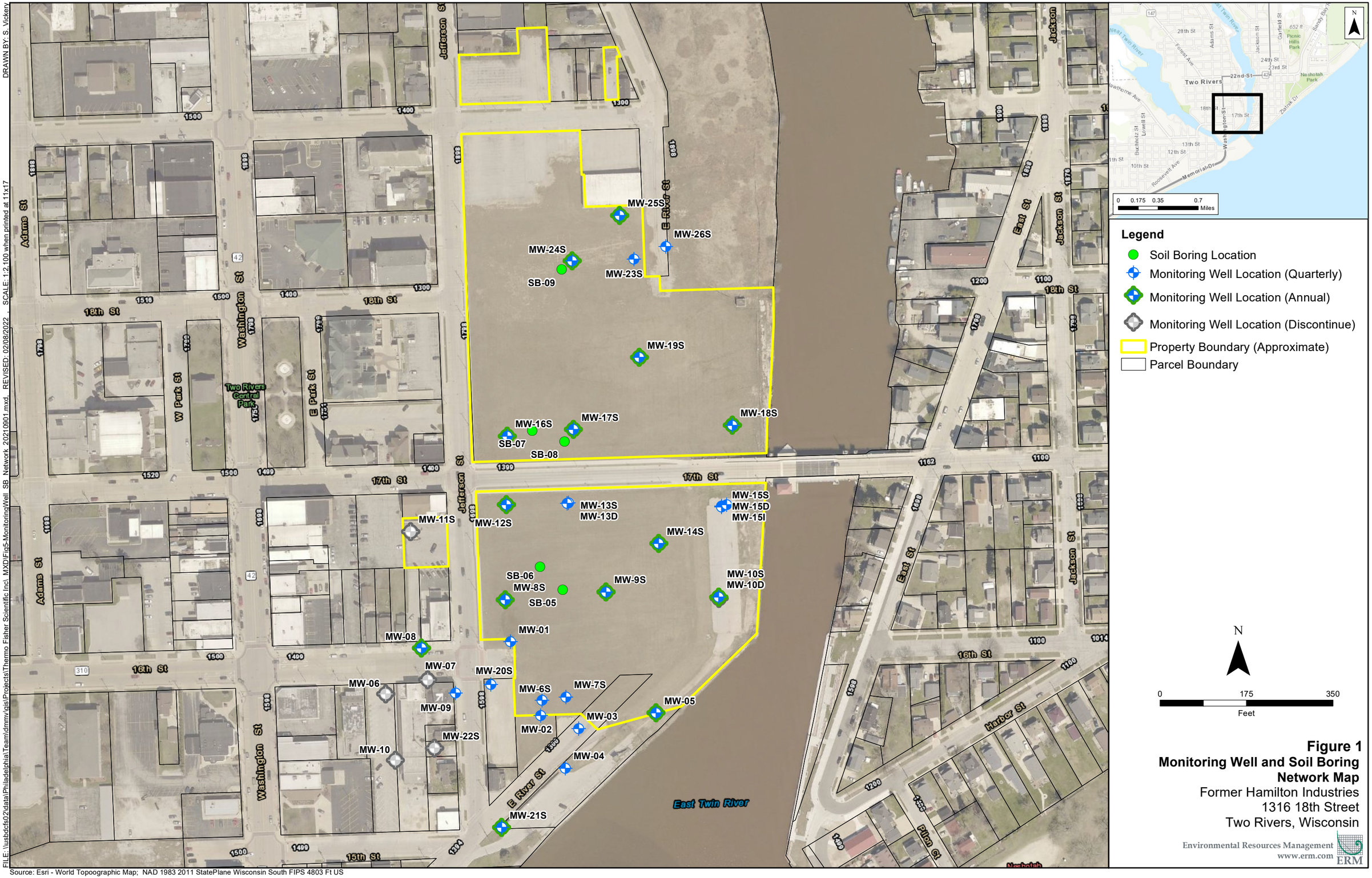
The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 920-510-3472 or at Tauren.Beggs@wisconsin.gov.

Sincerely,

Tauren R. Beggs
Northeast Region Project Manager
Remediation & Redevelopment Program

Attachment: Figure 1, Monitoring Well and Soil Boring Network Map, dated February 8, 2022

cc: Robert Fetter, Thermo Fisher Scientific (robert.fetter@thermofisher.com)
David de Courcy-Bower, ERM (david.decourcybower@erm.com)
John Roberts, ERM (john.roberts@erm.com)



DRAWN BY: S. Vickery

SCALE: 1:2,100 when printed at 11x17

REVISED: 02/08/2022

FILE: \\usbdcfs02\data\Philadelphia\Team\dmmv\gis\Projects\Thermo Fisher Scientific Inc\ MXD\Fig5-MonitoringWell_SB_Network_20210901.mxd

Source: Esri - World Topoographic Map; NAD 1983 2011 StatePlane Wisconsin South FIPS 4803 Ft US

Figure 1
Monitoring Well and Soil Boring Network Map
Former Hamilton Industries
1316 18th Street
Two Rivers, Wisconsin

Environmental Resources Management
www.erm.com
ERM