



July 23, 2024

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

Subject: Response to Technical Assistance Request – Off-Site PFAS Evaluation  
Hamilton Industries Site (Former)  
1316 18<sup>th</sup> Street, Two Rivers, WI 54241  
BRRTS #: 02-36-578316

Dear Mr. Podlaski:

This letter is written in response to a Technical Assistance Request for an *Off-Site Evaluation of Polyfluorinated Alkyl Substances (PFAS)* (Request), submitted on your behalf by Environmental Resources Management (ERM). The Request was received by the Wisconsin Department of Natural Resources (DNR) on May 10, 2024, with the \$700 review fee as required by Wisconsin Administrative Code (Wis. Admin. Code) § NR 749.04(1).

### **Background**

In response to DNR's October 9, 2023, determination that the site investigation for PFAS was not complete, ERM installed and sampled three off-site shallow groundwater monitoring wells in March 2024 that were either upgradient or side gradient (north, west, and southwest) of the existing monitoring well network. The PFAS concentrations in groundwater were detected above the Wisconsin Department of Health Services (DHS) recommended groundwater enforcement standards. ERM has requested DNR concurrence with the following:

- 1) The nature and extent of PFAS located off-site could be from co-mingled plumes from former industrial properties.
- 2) The nature and extent of PFAS at the Site has been sufficiently delineated for the purposes of the site investigation.
- 3) The presence of PFAS in groundwater at the Site at concentrations that exceed the proposed PAL, proposed ES, and the NR 809 MCL can be managed with a groundwater use restriction [aka groundwater continuing obligation] for the Site and no active remediation or further groundwater sampling for PFAS is required.

### **Determination**

DNR has reviewed the Request and does not concur that the site investigation for PFAS is complete. DNR has determined the following:

- Degree and extent of PFAS has not been defined in groundwater. Additional investigation is needed to define degree and extent of PFAS contamination in groundwater above the Wisconsin Department of Health Services (DHS) recommended groundwater enforcement standards.
- The investigation is not sufficient to determine if off-site source(s) may be contributing to the PFAS contamination on-site and if so, to what extent.
- Surface water sampling for PFAS is needed to determine if the PFAS contamination from the site has impacted the East Twin River.

- Submit a work plan to the DNR in accordance with Wis. Admin. Code § NR 716.09 for additional site investigation.

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](http://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](mailto:Tauren.Beggs@wisconsin.gov).

Sincerely,



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

cc: Robert Fetter, Thermo Fisher Scientific ([robert.fetter@thermofisher.com](mailto:robert.fetter@thermofisher.com))  
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