

## Pfeiffer, Jane K - DNR

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**From:** Pfeiffer, Jane K - DNR  
**Sent:** Thursday, January 4, 2024 9:48 AM  
**To:** Richard Mazurkiewicz  
**Cc:** Donald.d.richards@gmail.com  
**Subject:** Beta Becher Acquisition Co, LLC - Historic Fill (BRRTS #02-41-589088) - Site Status

Good Morning Ric,

Thank you for taking the time to discuss the subject site status with me today. The purpose of this email is to remind you of Wis. Admin. Code NR 700 requirements and DNR recommendations as redevelopment plans progress. Based on recent site status updates, the DNR understands that site redevelopment will commence soon and that the planned eight buildings will be constructed in four phases; two buildings will be developed as a part of each phase. As the DNR indicated in the 07/11/23 *Site Investigation Review* letter, the site investigation activities completed to-date have focused on historical fill material throughout the site and not historical site operations. Most of the soil and groundwater sampling locations advanced to-date are not in areas within the current building footprints where the former long-term industrial operations occurred. Further, if evidence of a hazardous substance discharge, separate from the discharge related to the historical fill material, is identified during site redevelopment, then the DNR must be notified immediately and the Wis. Admin. Code NR 700 process must be implemented. The DNR strongly recommends that Ramboll, as the environmental consultant working on this project, oversee the proposed soil management activities to help to properly characterize soil being managed through field observations (i.e., visual, olfactory, etc.). Additionally, considering site conditions will be significantly changing during redevelopment, the 07/11/23 DNR letter indicates that post-construction sub-slab vapor investigation is needed at all planned buildings. If vapor risk screening level exceedances are identified, then a remedial action must be conducted to reduce the mass and concentration of volatile compounds to the extent practicable and mitigation of the vapor intrusion pathway, per Wis. Admin. Code § NR 726.05(8)(b).

The site is approximately 10 acres in size and only four soil samples were collected from beneath the historical site buildings, which have been used for industrial purposes since the late 1800s. Contamination may be present from the historical operations and infrastructure that has not yet been identified during site investigation activities related to fill as a source. As the phased redeveloped progresses, the DNR recommends that Ramboll specifically consider the recognized environmental conditions (RECs) related to the historical long-term industrial operations, which are outlined in the Phase I ESA, dated July 2021. RECs and observations identified in the Phase I ESA to consider during building/infrastructure demolition and construction and soil management work include the former paint spray booth(s), glycol dip tank(s), machine shop areas, drum storage areas, existing and former utilities/trenches, etc. As stated in the DNR's 07/11/23 *Materials Management Plan* letter, any hazardous substance discharge discovered during contaminated soil and solid waste management activities during the site redevelopment must be reported to the DNR under Wis. Admin. Code ch. NR 706 and may need to be investigated and remediated. As a reminder, it is often most technically and economically feasible to perform site investigation and remediation prior to or alongside redevelopment work.

As you indicated your 11/22/23 email, Ramboll plans to provide the DNR with periodic updates as the site redevelopment progresses. Please remember that, per Wis. Admin. Code § NR 716.14, all sampling results must be submitted within 10 days of receiving laboratory data. This data should be submitted through the DNR's RR electronic submittal portal. The DNR looks forward to continuing to work with you and your client to ensure that the redevelopment project is a success for the community and is protective of human health and the environment.

Thank you, Jane

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**Jane K. Pfeiffer**

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