

**From:** Beggs, Tauren R - DNR  
**Sent:** Friday, July 29, 2022 10:41 AM  
**To:** Que El-Amin  
**Cc:** Matt Dahlem; Elizabeth Runge; Kristin Jones (Kristin.Jones@newellco.com); Sawula, Andrew N.; Gabriel M. Rodriguez (gabriel.rodriguez@afslaw.com); Paul Lindquist; Susan Petrofske  
**Subject:** Site Investigation Work Plan Review Letter for Bright Horizon Properties LLC (Former), BRRTS # 02-36-589295  
**Attachments:** 20220729\_36\_SIWP\_Appr.pdf

Good morning Que,

Attached is the electronic version of the Site Investigation Work Plan Review letter for the above referenced site. If you want a paper copy, please let me know.

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

Regards,

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**Tauren R. Beggs**

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[dnr.wi.gov](http://dnr.wi.gov)



July 29, 2022

West River Lofts, LLC  
Attn: Que El-Amin  
4201 N. 27<sup>th</sup> Street  
Milwaukee, WI 53216  
Via electronic mail only to [que@scott-crawford.com](mailto:que@scott-crawford.com)

Subject: Review of Site Investigation Work Plan  
Bright Horizon Properties LLC (Former)  
1621 14<sup>th</sup> Street (formerly 1702 13<sup>th</sup> Street), Two Rivers, WI  
BRRTS #: 02-36-589295

Dear Mr. El-Amin:

On June 23, 2022, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (SIWP) prepared on West River Lofts, LLC's behalf by Fehr Graham Engineering & Environmental (Fehr Graham). The SIWP was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. Ch. 292. The DNR reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

#### DNR Review of the SIWP

The DNR review of the SIWP has determined that the general code requirements have been met. However, the well variance is not granted for 1-inch wells due to PAH variability in groundwater across the site even in areas where PAHs were not found in soil. Follow code for installation of 2-inch monitoring wells to evaluate PAH exceedances in groundwater.

The additional clarifications/comments below may be addressed as an addendum to this SIWP before the work is completed or in a future SIWP after additional site data has been collected:

- Soil:
  - Additional soil sampling needed in areas of the former rail line and the 65-gallon gas tank to evaluate potential impacts from recognized environmental conditions (RECs).
  - Additional soil sampling needed in the area near MW-7 where trichloroethylene (TCE) was detected above groundwater pathway and non-industrial direct contact residual contaminant levels (RCLs).
  - Additional soil sample needed between B-8 and MW-11. Analyze for volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs).
  - Evaluate if polycyclic aromatic hydrocarbon (PAH) and metal contamination should be considered site wide and the implications on extent of site investigation sampling needed.
  - Evaluation of aluminum in areas of former aluminum operations.
- Groundwater:
  - Provide evaluation of existing one inch monitoring wells and potential replacement of those monitoring wells with 2-inch wells after the next comprehensive groundwater monitoring event.

- Evaluate whether MW-6 should be replaced with a 2-inch well as part of the site investigation since groundwater was only sampled once before the monitoring well was destroyed.
- Vapor:
  - For each building being evaluated for vapors, determine the building foundation construction (i.e. slab on grade, basement, crawlspace, if a sump is present). There may be buildings which also have additions and are separated by footings; if this is the case, each slab may need a vapor port. Vapor sampling may change based on this information.
  - For 1600 12<sup>th</sup> Street – 4 sub slab ports have been proposed along the east side of the building. If possible, place two sub slab ports close to the contamination, and two ports closer to the center of the building to account for spatial variability of vapors under a building.
  - For 1702 13<sup>th</sup> Street – 3 sub slab ports have been proposed along the north side of the building. If possible, place two sub slab ports close to the contamination, and one port closer to the center of the building to account for spatial variability of vapors under a building.
  - Evaluate whether vapor sampling is warranted at 1612 12<sup>th</sup> Street or 1700 12<sup>th</sup> Street.
  - A utility vapor investigation was not included in the work plan. In-pipe and/or utility backfill investigation may be needed if it is a potential pathway for contaminant migration. Information needs to be obtained to determine what investigation may be needed. Information can include but may not be limited to: type of utility backfill compared to surrounding soils, historic and current sanitary sewer and storm utilities and laterals, and removal or replacement of utilities. Figure(s) should be provided to depict locations of historic and/or current utilities, as applicable.
- Sediment:
  - While there may have been no direct discharge to the river historically, the data from MW-5 for PAHs, metals, and PCBs is above the probable effects concentration (PEC) Consensus Based Sediment Quality Guidelines (CBSQGs). Provide more historical information of building construction, operations adjacent to the river, any potential discharge pipes, potential for overland flow, etc. Provide additional justification or conduct sediment sampling within the river for PAHs, metals, and PCBs. Justification or sediment sampling will either need to be conducted at this time or will need to be evaluated after further upland investigation is completed.
- Surface Water:
  - Depending on groundwater contaminant concentrations an evaluation of surface water impacts may be necessary.
- Emerging Contaminants: Based on the historic use of the property as former Mirro Plant No. 4, which is associated with per- and polyfluoroalkyl substance (PFAS) used in the manufacturing operations of non-stick cookware, sampling for PFAS is needed for this site, unless additional information can be provided regarding specific operations at this plant location to indicate PFAS was not used.

#### Other DNR Comments

1. A site investigation is an iterative process. Depending upon the results of the sampling from this proposed work, additional investigation may be necessary to define the degree and extent of the contamination.
2. All Wis. Admin. Code ch. NR 700 submittals must be submitted in an electronic format through the RR Submittal Portal.
3. NR 700 semi-annual progress reports will be required until the case is closed.

Que El-Amin, West River Lofts, LLC  
Review of Site Investigation Work Plan  
Bright Horizon Properties LLC (Former), BRRTS #: 02-36-589295

### Schedule

The SIWP includes an implementation schedule for conducting the field investigation, per Wis. Admin. Code § NR 716.09(2)(h), which includes:

- Per Wis. Admin. Code § NR 716.11(1)(2r), field investigation activities will be initiated within 60 days after the DNR approval of the work plan, by September 27, 2022.
- Results of the site investigation activities will be submitted to the DNR in a Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR will be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. A fee may be submitted for DNR review and response.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 920-510-3472 or at [Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov).

Sincerely,



Tauren R. Beggs  
Project Manager – Hydrogeologist  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Matt Dahlem, Fehr Graham ([mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com))  
Elizabeth Runge, City of Two Rivers ([elirun@two-rivers.org](mailto:elirun@two-rivers.org))  
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