

June 20, 2023

Mr. Tauren R. Beggs
Wisconsin Department of Natural Resources
Green Bay Service Center
2984 Shawano Ave
Green Bay, WI 54313-6727

**RE: Addendum to Materials Management Plan and Chapter NR 718 Exemption Request
West River Lofts, LLC
1621 14th Street
Two Rivers, Wisconsin 54241
WDNR BRRTS #: 02-36-589295 BRIGHT HORIZON PROPERTIES LLC (FORMER)**

Dear Mr. Beggs,

This addendum is to address the sampling rationale of the remedial excavations to take place onsite as described in Fehr Graham's Materials Management Plan and Chapter NR 718 Exemption Request (MMP) dated June 5, 2023.

HAZARDOUS WASTE

Targeted PCB Remedial Excavations at MW-5 and MW-5R2 Areas

Per Section 2.4.3 of Fehr Graham's MMP dated June 5, 2023, two approximately 8.5 feet by 8.5 feet wide by 5 feet deep remedial excavations (approximately 13 Cubic Yards [CY] or 20 tons at each remedial excavation totaling 26 CY or 40 tons) within the SB-5R2 area (where Polychlorinated Biphenyls [PCBs] exceed 50 milligrams per kilogram [mg/kg]) and the MW-5 area (where PCBs are approximately 6.6 mg/kg) (Figure 8e) will be treated as hazardous waste and under a Waste Management (WM) profile per Toxic Substances Control Act PCB regulations.

Soil excavation will be completed using a backhoe, front end loader, and dump trucks. Access to the excavation area is not an issue for a backhoe or any needed equipment access, and utility line clearances will be required prior to any subsurface activities. The excavation is uncomplicated, as no water or hole collapse issues are anticipated at this time due to depth to water anticipated to be greater than 6 feet below grade.

This soil will be disposed of in accordance with 40 CFR 761.61(b) and 40 CFR 761.62, staged in WM supplied roll off containers appropriately per Fehr Graham's MMP and then landfilled at WMs licensed Chemical Waste Management (CWM) hazardous waste facility in Arlington, Oregon under WM Profile # OR354957. Transport of this material will be by WM personnel and vehicles only. Following excavation activities, soil samples will be collected from the excavation sidewalls and base with the sampling rationale as follows:

- MW-5 Area
 - Excavation to 5 feet below grade
 - Collect 4 sidewall samples from 2-4 feet below grade for PCBs
 - Collect 1 base sample at 5-feet below grade for PCBs

- MW-5R2 Area
 - Excavation to 5-feet below grade
 - Collect 4 sidewall samples from 3-4-feet below grade for PCBs
 - Collect 1 base sample at 5-feet below grade for PCBs

Per Code of Federal Regulations (CFR) Title 40 Chapter I Subchapter R Part 761 Subpart D § 761.61(b), these PCB remedial excavations will be performance based with a PCB cleanup goal of 1 part per million or 1 mg/kg.

NON-HAZARDOUS WASTE

Remedial excavations to 4-6 feet below grade will occur where some contaminants of concern currently exist above the non-industrial direct contact Residual Contact Level within 4 feet of current grade in the northeast corner of the Property (MW5TPN1, MW5TPW1, MW5TPE2, MW5TPW2, MW5TPE1, MW5TPS1, MW5TPS2, MW-5R1, SB-56, and TW-57) totaling approximately 165 CY and within other areas of the property (B8, SB-62, MW7-TPE2, TW-75, SB-42/SB-69, and TW-38/SB-39) totaling approximately 280 CY (Figure 8a). This material will be staged appropriately per the MMP and then landfilled or direct landfilled at WMs Ridgeview licensed Recycling and Disposal Facility in Whitelaw, Wisconsin under WM Profile # 139054WI. The following sampling rationale is included below on the other targeted remedial excavations onsite.

Northeast Area Remedial Excavation

- Excavate entire area to 4 feet below grade
- Collect 5 sidewall samples from 0-4-feet below grade for Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), and Resource Conservation and Recovery Act Metals
- Historic samples from earlier investigations will provide the remaining coverage laterally and vertically

Remaining Targeted Remedial Excavation Areas

- B-8 Area
 - Excavation to 4 feet below grade
 - Collect 4 sidewall samples from 0-4-feet below grade for Chlorinated VOCs (CVOCs)
 - No base sample as B-8 already has 4-8 feet below grade data
- SB-62 Area
 - Excavation to 5 feet below grade
 - Collect 4 sidewall samples from 2.5-5 feet below grade for lead
 - No base sample as SB-62 already has 5-7 feet below grade data
- MW7-TPE2 Area
 - Excavation to 5 feet below grade
 - Collect 4 sidewall samples from 0-4-feet below grade for CVOCs
 - Collect 1 base sample at 5-feet below grade for CVOCs
- TW-75 Area
 - Excavation to 5 feet below grade
 - Collect 4 sidewall samples from 3-4.5 feet below grade for CVOCs
 - Collect 1 base sample at 5 feet below grade for CVOCs

- SB-42/SB-69 Area
 - Excavation to 6 feet below grade
 - Collect 6 sidewall samples from 2.5-5.5 feet below grade for PAHs and lead
 - Collect 2 base samples at 6 feet below grade for PAHs and lead
- TW-38/SB-39 Area
 - Excavation to 5 feet below grade
 - Collect 6 sidewall samples from 1-4-feet below grade for CVOCs
 - No base sample as TW-38/SB-39 already has 5-5.5 feet below grade data

Following soil sampling activities, granular fill material or clean clay will be imported and placed within all the remedial excavation areas. The site will be capped-in-place as part of the redevelopment process to address potential direct contact concerns by engineering controls in the form of building slabs, paved areas, concrete patio/sidewalk, and/or a clean soil cap in the landscaped areas (excavations to 2 feet deep in the proposed greenspace areas will be completed, 2 feet of clean soil is to then be placed over the contaminated soil) that will remain in place following redevelopment. See Section 2.4.12 of the MMP for further capping details.

Respectfully submitted,



Matt Dahlem, PG
Branch Manager

MJD:jjj

Attachments:
Figure 8a: CVOC – Soil
Figure 8e: PCBs - Soil



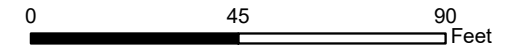
Figure No.

8a

Title

Soil Quality - CVOCs

Client/Project
 West River Lofts, LLC
 1621 14th Street
 Two Rivers, Wisconsin



Legend

- 1621 14th Street Property
- Previous Sample Locations (FG, 2022)**
- + Soil Boring
- Test Pit
- ⊕ Temp Well
- ★ Northeast Area Remedial Excavation Sidewall Samples (FG, 2023)
- ▨ Remedial Excavations to 4 Feet Below Ground Surface (FG, 2023)
- Current Capped Asphalt Area Will Not Be Disturbed and Will Remain Capped by Asphalt After Development
- Shallow CVOC Areas to be Construction Staked After Topsoil Removal to Remain in Place and Capped
- CVOCs > Non-Industrial Direct Contact RCL
- CVOCs > Soil to Groundwater RCL
- CVOCs > Non-Industrial Direct Contact RCL
- CVOCs > Industrial Direct Contact RCL
- CVOCs > Soil to Groundwater RCL
- Proposed Building Footprint
- Stantec Sample Locations**
- + Soil Boring / Monitoring Well (15)
- + Monitoring Wells (9)
- + Soil Boring (43)
- ⊕ Soil Boring / Temp Well (10)



Approximately 4" of surficial material will be removed from the current greenspaces of the existing parcel.

Notes

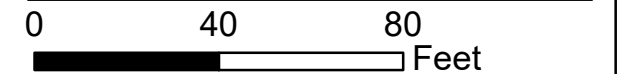
1. Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
2. Orthophotograph: Manitowoc County, 2020
3. CVOC = chlorinated volatile organic compound; RCL = residual





Figure No. **8e**
 Title **Soil Quality - PCBs**

Client/Project
 West River Lofts, LLC
 1621 14th Street
 Two Rivers, Wisconsin
 Prepared by SC on 03/14/2023



- Legend**
- Building Footprint
 - PCBs > Industrial Direct Contact RCL
 - PCBs > Non-Industrial Direct Contact RCL
 - Excavation to 4 Feet Below Ground Surface
 - Excavation to 5 Feet Below Ground Surface



- Stantec Sample Locations**
- Soil Boring / Monitoring Well (15)
 - Monitoring Wells (9)
 - Soil Boring (43)
 - Soil Boring / Temp Well (10)
 - Temp Well (1)

- Previous Sample Locations (FG, 2022)**
- Soil Boring
 - Test Pit
 - Temp Well

Notes
 1. Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
 2. Orthophotograph: Manitowoc County, 2020