

**From:** Matt Dahlem <mdahlem@fehrgraham.com>  
**Sent:** Wednesday, June 21, 2023 10:21 AM  
**To:** Beggs, Tauren R - DNR  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC  
**Attachments:** 22-221 - Scott Crawford, Inc. 2023-06-20 - Addendum to MMP & Chapter NR 718 Exemption Request.pdf

Attached Tauren.



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

909 North 8th Street, Suite 101  
Sheboygan, Wisconsin 53081  
P: 920.453.0700  
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---

**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Tuesday, June 20, 2023 9:16 AM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Sounds good thanks Matt

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**Tauren R. Beggs**

Phone: (920) 510-3472

[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Tuesday, June 20, 2023 9:15 AM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Thanks Tauren – Ill get that shored up and get to you as a final PDF after client review as well if that works for you.

Matt



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Tuesday, June 20, 2023 8:34 AM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Hi Matt,

I have reviewed and have the following revisions in the last two paragraphs of the PCB section:

- In the first sentence of the second to last paragraph, add the 40 CFR 761.61(b) reference here too, so the sentence would say “This soil will be disposed of in accordance with 40 CFR 761.61(b) and 40 CFR 761.62...”
- The following language needs to be deleted because this site is not going through the coordinated approval process with EPA, so does not apply to this site: “Based on the post-remedial excavation sampling, if the PCB cleanup goals are achieved, per 40 CFR 761.61(c)(2), Fehr Graham is requesting EPA issue a written approval of testing and disposal such that after remedial excavations, this material will not pose an unreasonable risk of injury to health or the environment.”

The performance based sentence looks good. Everything else looked good for the other remedial excavations.

Regards,

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[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Monday, June 19, 2023 3:08 PM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Draft attached – let me know what you think.



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Thursday, June 15, 2023 1:28 PM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** Re: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Roger that & will do

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Thursday, June 15, 2023 1:04:36 PM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

I think it should be fine to include some quick statements regarding the other confirmation sampling for other excavations within the addendum as well.

Regards,

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**Tauren R. Beggs**

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Thursday, June 15, 2023 1:00 PM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** Re: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Yup - PCBs in those targeted excavations & then the larger excavations bound by previous data/borings so good there & if not bound we will sample for contaminants of concern in that area with sidewall & base samples at those respective intervals. Thx Tauren. My addendum though will just reflect the PCBs though for epa approval.

Matt

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Thursday, June 15, 2023 12:41:30 PM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Do you have a little time this afternoon to chat over Teams? I did the peer review presentations this morning, so could provide a little update.

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**From:** Beggs, Tauren R - DNR  
**Sent:** Thursday, June 15, 2023 12:40 PM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Hi Matt,

The confirmation sampling should be geared towards the contaminants of concern that are being excavated in that area and target the intervals where the highest concentrations were found, so it would seem appropriate to sample the 3-4 foot intervals on the sidewalls for the PCB excavations and if going down to 5 feet likely a bottom sample too. Want to definitely confirm that TSCA level PCBs and the other elevated PCBs in the MW-5 area are being removed and that it will meet the 1ppm cleanup objective. This excavation area also looks like it is being expanded beyond just the PCB areas too, so the other contaminants of concern such as VOCs would also be appropriate since trying to remove to further limit what is on-site near the building.

PAHs and metals may not be as important to do confirmation sampling for since those contaminants are still going to remain all across the entire site in the fill material anyways, but in certain excavation areas if you are targeting the excavation for elevated PAHs specifically, such as the SB-42 area, then PAH confirmation sampling may be appropriate in those areas.

Hopefully that helps.

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Phone: (920) 510-3472

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---

**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>

**Sent:** Thursday, June 15, 2023 8:54 AM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Im going to put a blip in the EPA addendum on the sampling plan, for the sidewalls, do we want to grab only PCB samples from the haz area only where the high hits were? For instance SB-5R2/MW-5R2 (3-4) was the one at 79 mg/kg for PCBs, is 3-4 feet where we want to sample the 4 sidewalls at then? Or do 0-4-feet?



**MATT DAHLEM, PG | Branch Manager**

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Sent:** Wednesday, June 14, 2023 11:41 AM

**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>

**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Sounds good just sent you a Teams invite for 2-3pm. Likely won't take the whole time.

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**Tauren R. Beggs**

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>

**Sent:** Wednesday, June 14, 2023 11:39 AM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Subject:** RE: Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Ya and hope I can answer them 😊 Open between 2 and 4 there Tauren.



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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Sent:** Wednesday, June 14, 2023 11:37 AM

**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>

**Subject:** Questions for Remedial Action Plan/MMP for Bright Horizon Properties LLC/West River Lofts LLC

Hi Matt,

I am looking through the plan for the proposed redevelopment and had some questions/clarifications I wanted to ask you about. Do you have some time this afternoon for a Teams call?

Regards,

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**Tauren R. Beggs**

Hydrogeologist & Northeast Region Land Recycling Expert  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
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**From:** Beggs, Tauren R - DNR  
**Sent:** Wednesday, June 14, 2023 11:49 AM  
**To:** Graczyk, Lisa (she/her/hers)  
**Cc:** Ramanauskas, Peter  
**Subject:** RE: Please Confirm EPA Requirements Met for Proposed Removal of Soil with PCBs >50ppm at Bright Horizon Properties LLC (Former), 1702 13th St, Two Rivers, WI

Hi Lisa,

Sounds good, will do.

Thanks,

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**Tauren R. Beggs**

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**From:** Graczyk, Lisa (she/her/hers) <[graczyk.lisa@epa.gov](mailto:graczyk.lisa@epa.gov)>  
**Sent:** Wednesday, June 14, 2023 11:48 AM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Cc:** Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>  
**Subject:** RE: Please Confirm EPA Requirements Met for Proposed Removal of Soil with PCBs >50ppm at Bright Horizon Properties LLC (Former), 1702 13th St, Two Rivers, WI

Hi Tauren,

Thanks for clarifying! My recommendation is that the cleanup goal be put in the report to avoid any confusion. If the report is being updated already, shouldn't be too much effort.

Lisa

---

Lisa Graczyk  
U.S. EPA Region 5  
tel: 312/353-3219; FAX: 312/886-6869

---

**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Wednesday, June 14, 2023 11:33 AM  
**To:** Graczyk, Lisa (she/her/hers) <[graczyk.lisa@epa.gov](mailto:graczyk.lisa@epa.gov)>  
**Cc:** Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>  
**Subject:** RE: Please Confirm EPA Requirements Met for Proposed Removal of Soil with PCBs >50ppm at Bright Horizon Properties LLC (Former), 1702 13th St, Two Rivers, WI

Hi Lisa,

Thanks for looking at this so quickly. The two areas they are excavating are the only areas above 1ppm that have been found on the property. PCB concentrations for samples collected in other areas of the property have ranged from no detection above the laboratory MDL to 0.54ppm, which is above the non-industrial direct contact level for Wisconsin. Therefore, the remaining PCB contamination along with other contamination at the property including PAHs and metals found in fill material above direct contact levels are being addressed via a sitewide cap consisting of the building, parking lot, concrete, and greenspace areas consisting of 18 inches of clean clay and 6 inches of topsoil with vegetation. PCBs were initially detected in groundwater in the elevated PCB areas they plan to excavate, but was not detected in groundwater the last round. All other groundwater samples collected on the property have had no detections of PCBs above the laboratory MDL; therefore, PCBs are not causing a significant groundwater issue at the site and the excavation will remove the significant PCB concentrations in soil in this area. VOCs have been found which are being addressed separately due to leaching potential and vapor intrusion concerns.

I can have them modify the report with an addendum to correct the regulatory citation. They don't state a specific cleanup number in the report but are excavating all the PCBs in soil above 1ppm and handling the rest that is below 1ppm with a direct contact cap. Is this sufficient or do you want them to add a specific cleanup goal number?

Thanks,

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**Tauren R. Beggs**

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[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

---

**From:** Graczyk, Lisa (she/her/hers) <[graczyk.lisa@epa.gov](mailto:graczyk.lisa@epa.gov)>

**Sent:** Wednesday, June 14, 2023 9:59 AM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Cc:** Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>

**Subject:** FW: Please Confirm EPA Requirements Met for Proposed Removal of Soil with PCBs >50ppm at Bright Horizon Properties LLC (Former), 1702 13th St, Two Rivers, WI

**Importance:** High

Hi Tauren,

I did a review of the PCB remediation and disposal in the attached report. The report states that 40 CFR 761.62 will be followed for disposal of the PCB remediation waste. This is an incorrect citation. It appears that 761.61(b), *Performance Based Disposal*, is being followed. This regulation requires all PCB remediation waste > 1 ppm PCBs be disposed in a PCB Chemical Waste Landfill. The WM Chemical Waste Management facility in Arlington, Oregon does have an approved TSCA Chemical Waste Landfill. It appears that they are disposing of the soil properly.



We assume a cleanup is still progressing under WDNR regulations. What is the PCB remedial goal for the soil at the site?

In summary, the report needs to be modified to state the correct regulatory citation for the PCB remediation and I recommend that the cleanup goal be included in the remediation narrative unless it is in some other section of the report that I didn't see. The disposal of the PCB remediation waste is being sent to a facility approved/permited to accept the soil as allowed for under the TSCA PCB regulations without the need for a separate approval from USEPA.

Please contact Peter and I with any additional questions as this proceeds.

Thank you.

Lisa

---

Lisa Graczyk  
U.S. EPA Region 5  
tel: 312/353-3219; FAX: 312/886-6869

---

**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Sent:** Tuesday, June 13, 2023 10:54 AM

**To:** Ramanauskas, Peter <[ramanauskas.peter@epa.gov](mailto:ramanauskas.peter@epa.gov)>; Graczyk, Lisa (she/her/hers) <[graczyk.lisa@epa.gov](mailto:graczyk.lisa@epa.gov)>

**Subject:** Please Confirm EPA Requirements Met for Proposed Removal of Soil with PCBs >50ppm at Bright Horizon Properties LLC (Former), 1702 13th St, Two Rivers, WI

**Importance:** High

Hi Peter and Lisa,

As discussed with Peter on May 16, a small area (MW-5R2) of PCBs at 79ppm and a small area (MW-5) of PCBs 6.6ppm (26 cubic yards total) in soil on the attached map at the above referenced property is planned to be excavated and landfilled out of state at Waste Management's (WM) Chemical Waste Management (CWM) facility in Arlington, Oregon. WM personnel, containers, and vehicles will only be used for the handling, transport, and disposal of this contaminated soil. All the other PCB samples collected within this area were well below 1ppm.

I believe the remedial action plan submitted to the DNR on June 9, 2023, confirms what was initially discussed with you on 5/16/2023 for the remedy of this PCB contaminated soil. Sections 2.4.3, 2.7.2, and 2.7.3 outlines the PCB Remedial Excavation. Due to the size of the report I only attached the main pieces of the report that pertain to the PCB excavation (written portion of the report, the PCB excavation figure, and Appendix B, which has the waste profile for taking the contaminated soil to the CWM facility).

You wanted me to follow up with you when the plan was submitted to ensure the contaminated soil was being properly handled and disposed under 40 CFR 761. Please reply to confirm if this submittal meets EPA's requirements.

If you need anything else or would like to discuss, please let me know.

Thanks,

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**Tauren R. Beggs**

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

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**From:** Matt Dahlem <mdahlem@fehrgraham.com>  
**Sent:** Wednesday, May 24, 2023 9:45 AM  
**To:** Beggs, Tauren R - DNR  
**Subject:** RE: West River Lofts PCB Area

**CAUTION: This email originated from outside the organization.  
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Super beyond appreciate that Tauren, you are beyond fantastic to work with on these remediation and redevelopment projects.



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Wednesday, May 24, 2023 9:44 AM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: West River Lofts PCB Area

Thanks for the update Matt, I will expedite these reviews as quickly as I can to try to help meet deadlines on your end. I don't have any other fee reviews currently in, so should be able to prioritize this.

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Wednesday, May 24, 2023 8:50 AM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** RE: West River Lofts PCB Area

Looking like middle of next week for the MMP/NR718 Exemption and Vapor Construction Design submittals there Tauren. We would like approvals (hopefully) by end of June – even email approvals will work for the lending. The construction schedule is out and set to start middle of July.

Just letting you know our timeline if that works from your end. And again, Stantec still not complete with SIR, so Im just referencing that will be coming in under separate cover. PCB area good to go to Oregon disposal at WM. Vapor construction plans up to date for future passive sampling. And again, we will do what is required after construction what is necessary for a pathway to closure. The most important things are that these 2 docs Im sending you get approved so we can construct. I feel both present solid environmental procedures that will protect human health and the environment and post-construction work then will further that cause in route to eventual site closure.

Thanks Tauren.  
Matt



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Monday, May 15, 2023 11:56 AM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: West River Lofts PCB Area

Hi Matt,

I am required to follow up with EPA on notification of PCB sites per the [One Cleanup PCB Memorandum of Agreement](#) that we have with them, so I have to follow up either way. This is good information to have though.

Regards,

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**Tauren R. Beggs**

Phone: (920) 510-3472

[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Monday, May 15, 2023 11:12 AM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** RE: West River Lofts PCB Area

We are going to plan to dig out the PCB area that's above 50 ppm and send it to Oregon Tauren so we don't need EPA involvement.

For the CVOC area at SB-75 / TW-75, waiting on a TCLP sample and may need a contained out letter from ya if we want to dig that out but be in touch.



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Sent:** Monday, May 15, 2023 9:27 AM  
**To:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Subject:** RE: West River Lofts PCB Area

Sounds good Matt. After we talked on Friday I was out at a Brownfield redevelopment event the rest of the day so I haven't looked at anything you have sent yet. Will start looking at the information you sent today.

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**Tauren R. Beggs**

Phone: (920) 510-3472

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Friday, May 12, 2023 10:01 PM  
**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>  
**Subject:** Re: West River Lofts PCB Area

Hold off on talking to EPA, Im talking to landfill Monday & letcha know after that. So dont talk to EPA till after I talk to landfill - will letcha know what landfill says & we will go from there. Thanks Tauren!  
Matt

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**From:** Matt Dahlem <[mdahlem@fehrgraham.com](mailto:mdahlem@fehrgraham.com)>  
**Sent:** Friday, May 12, 2023 3:17 PM  
**To:** 'Beggs, Tauren R - DNR' <[tauren.beggs@wisconsin.gov](mailto:tauren.beggs@wisconsin.gov)>  
**Subject:** West River Lofts PCB Area

Tauren, attached you will find soil chem maps with an excavation area map as well (its CVOC but shows the boring locations at least. Lab data for the borings attached as well with samples (word doc has the samples representative of the excavation area). Also note that we believe SB-5R2 (3-4) to be erroneous (and Stantec sampled that not Fehr Graham) our resample SB-5R2 (3-4)R id more representative based on the other data. All the other samples aren't even close to SB-5R2 (3-4)'s levels so again, I think this one is erroneous.

We would be looking first to take out the excavation area to 4-feet using the data we have and using SB-5R2 (3-4)R in place of SB-5R2 (3-4), or willing to average those two out. Otherwise we could leave SB-5R2 (3-4) / SB-5R2 (3-4)R in place and excavate the area to 2 – or 3- feet below grade and replace with 2-3-feet of clean fill.

Please let me know if you have any questions. This is mainly again for landfill disposal along with remediation of the property so landfill would listen to you / EPA if we could a) use the resample or b) use the average of SB-5R2 (3-4) / SB-5R2 (3-4)R for landfill disposal. We have a PCB certification sheet completed as well using the resample data.

Like everything else on this site, time is of the essence so please let me know, Im available for ya 24/7.

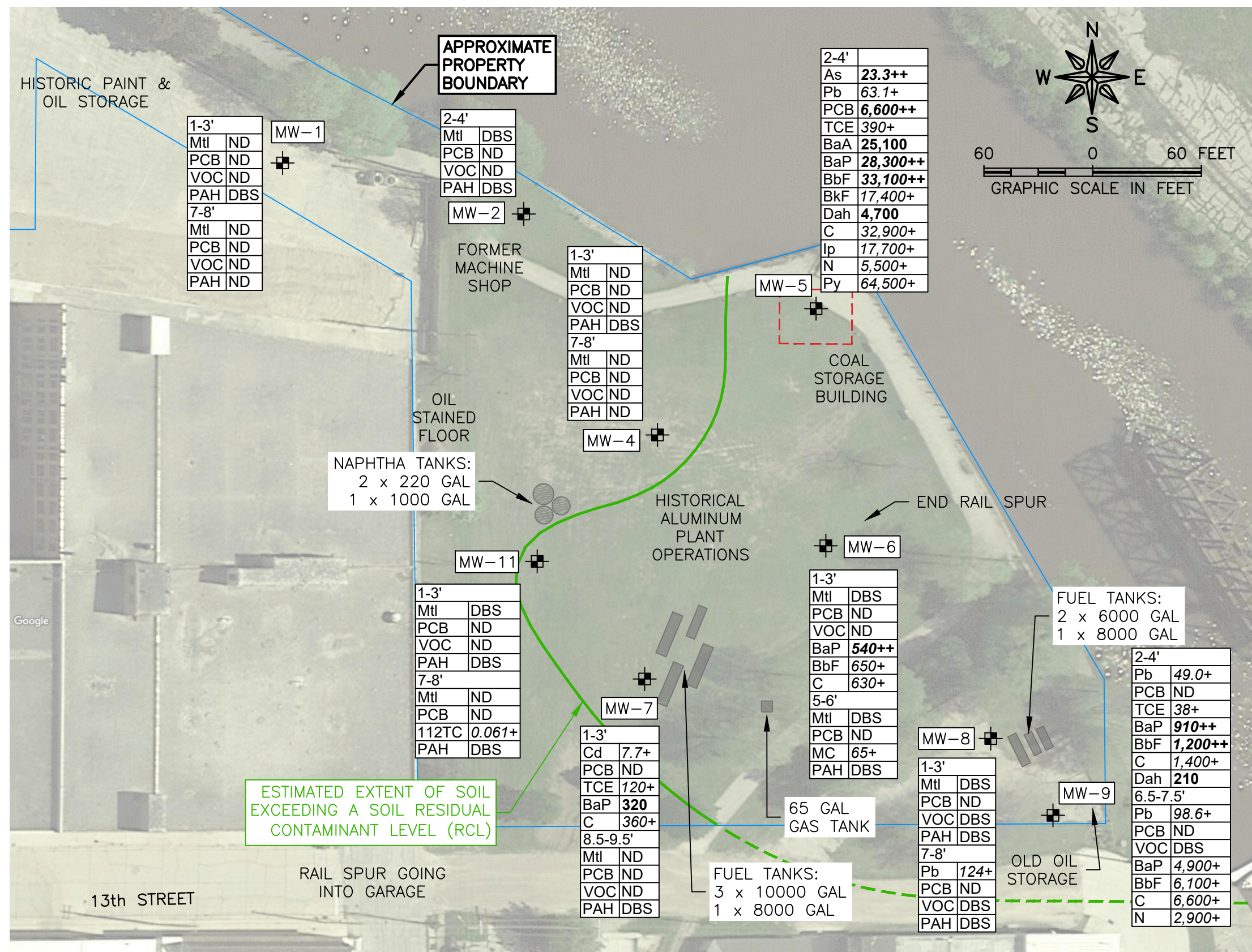
With that, happy Friday and have a great weekend!

Matt



**MATT DAHLEM, PG | Branch Manager**  
**Fehr Graham | Engineering & Environmental**

909 North 8th Street, Suite 101  
Sheboygan, Wisconsin 53081  
P: 920.453.0700  
[fehrgraham.com](http://fehrgraham.com)



**LEGEND**

☒ MONITORING WELL

As ARSENIC (mg/kg)  
 Cd CADMIUM (mg/kg)  
 Pb LEAD (mg/kg)  
 TCE TRICHLOROETHENE  
 MC METHYLENE CHORIDE  
 BaA BENZO(a)ANTHRACENE  
 BaP BENZO(a)PYRENE  
 BbF BENZO(b)FLUORANTHENE  
 BkF BENZO(k)FLUORANTHENE  
 C CHRYSENE  
 Dah DIBENZO(a,h)ANTHRACENE  
 Ip INDENO(1,2,3-cd)PYRENE  
 N NAPHTHALENE  
 Py PYRENE  
 Mtl RCRA METALS  
 VOC VOLATILE ORGANIC COMPOUNDS  
 PCB POLYCHLORINATED BIPHENYLS  
 PAH POLYNUCLEAR AROMATIC HYDROCARBONS  
 DBS DETECTIONS BELOW STANDARDS  
 ND NO DETECTIONS

*ITALICS+* EXCEED GROUNDWATER PATHWAY RCL

**BOLD** EXCEEDS ONLY NON-INDUSTRIAL DIRECT-CONTACT (0-4') RCL

*ITALICS/* EXCEED BOTH PAL & ENFORCEMENT  
**BOLD++** STANDARD

GROUNDWATER FLOW 7/13/21

NOTE: RESULTS REPORTED IN ug/kg UNLESS NOTED

**FIGURE 4**  
**SOIL CHEMISTRY**  
 JULY 13, 2021  
 1702 13th ST.  
 TWO RIVERS, WI 54241

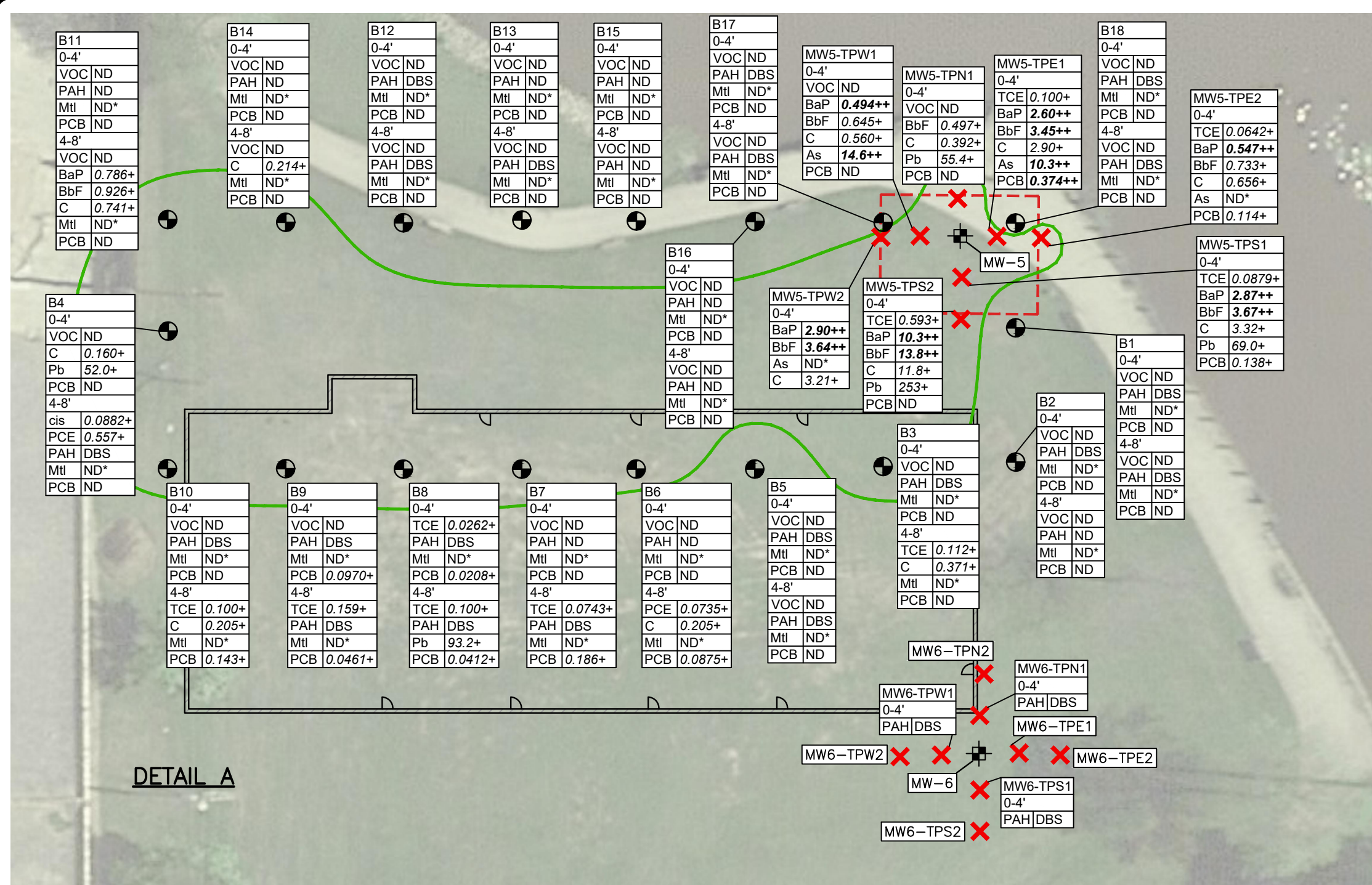
PARCEL:  
 PART OF PROPERTY INDEX NUMBER (PIN)  
 05300008301103 CONSISTING OF 5.66 ACRES  
 AND LABELED AS "EAST PROPERTY" ON ATTACHED  
 "OVERALL SITE PLAN" MAP

5/3/22

**FEHR GRAHAM**  
 ENGINEERING & ENVIRONMENTAL  
 ILLINOIS DESIGN FIRM NO. 194-003525

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 IOWA  
 WISCONSIN

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### LEGEND

- MONITORING WELL
- TEST PIT SAMPLE
- SOIL BORING

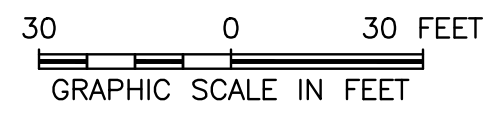
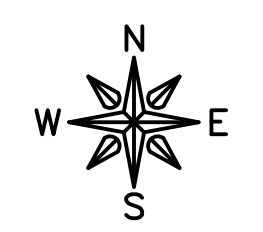
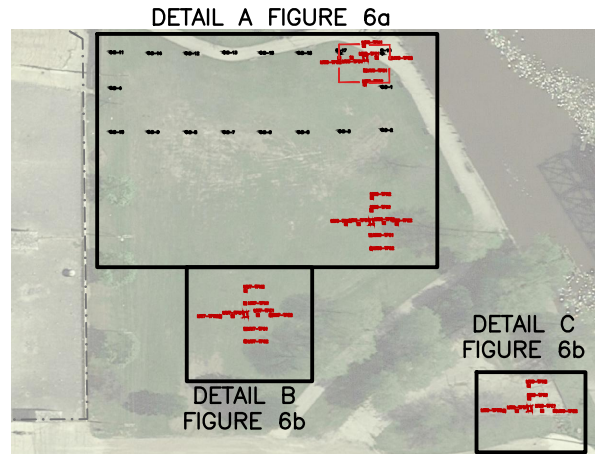
As ARSENIC  
Pb LEAD  
TCE TRICHLOROETHENE  
cis cis-1,2-DICHLOROETHENE  
BaP BENZO(a)PYRENE  
BbF BENZO(b)FLUORANTHENE  
C CHRYSENE  
Mtl METALS  
- ARSENIC  
- LEAD  
VOC VOLATILE ORGANIC COMPOUNDS  
- cis-1,2-DICHLOROETHENE  
- trans-1,2-DICHLOROETHENE  
- TETRACHLOROETHENE  
- TRICHLOROETHENE  
- VINYL CHLORIDE  
PCB POLYCHLORINATED BIPHENYLS  
PAH POLYNUCLEAR AROMATIC HYDROCARBONS  
DBS DETECTIONS BELOW STANDARDS  
ND NO DETECTIONS  
ND\* DETECTIONS BELOW BACKGROUND THRESHOLD VALUE, CONSIDERED NATURALLY OCCURRING

*ITALICS+* EXCEED GROUNDWATER PATHWAY RCL  
**BOLD** EXCEEDS ONLY NON-INDUSTRIAL DIRECT-CONTACT (0-4') RCL  
*ITALICS/ BOLD++* EXCEED BOTH PAL & ENFORCEMENT STANDARD

ESTIMATED EXTENT OF SOIL EXCEEDING A SOIL RESIDUAL CONTAMINANT LEVEL (RCL)

NOTE: ALL RESULTS REPORTED IN mg/kg  
SAMPLES COLLECTED AUG. 19-20, 2021

DETAIL A



**FIGURE 6a**  
BUILDING PERIMETER BORINGS &  
TEST PIT SOIL CHEMISTRY – DETAIL A  
1702 13th ST.  
TWO RIVERS, WI 54241

5/24/22

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IOWA  
WISCONSIN

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Figure No.

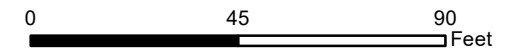
**8a**

Title

**Soil Quality - CVOCs**

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

Prepared by SC on 3/14/2023



**Legend**

- Remedial Excavations to 4 Feet Below Ground Surface
- 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 > Industrial Direct Contact RCL
- CVOCs > Soil to Groundwater RCL
- Building Footprint



**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
- CVOCs > Non-Industrial Direct Contact RCL
- CVOCs > Soil to Groundwater RCL

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



**NE Remedial Excavation Samples for Landfill**

Pace Project No.: 40229928

Date Collected: 07/12/21

MW5 2-4'

Pace Project No.: 40232128

Date Collected: 08/19/21

MW5TPN1

MW5TPW1

MW5TPE2

MW5TPW2

MW5TPE1

MW5TPS1

MW5TPS2

B-1 0-4

Eurofins Job No.: 500-223724-1

Date Collected: 10/10/22

SB-5R1 (0.25-1.5)

Eurofins Job No.: 500-223503-1

Date Collected: 10/04/22, 10/06/22, 10/07/22

SB-5R2 (1.5-3)

SB-5R2 (3-4)

Eurofins Job No.: 500-228025-1

Date Collected: 01/09-10/23

SB-57 (3-5)

Pace Project No.: 40261854

Date Collected: 05/09/23

SB-5R2 (3-4') R

# PCB CERTIFICATION FOR SUBTITLE D FACILITIES AND SUBTITLE C NON-TSCA FACILITIES

(NOTE: Portions of associated TSCA regulations and EPA guidance are included on Page 2 of this certification form)

Profile Number: 1 3 9 0 5 4 W I

I certify to Waste Management that within my company I have knowledge concerning the accuracy of the following representations and that the following representations are correct to the best of my knowledge.

  
SIGNATURE OF GENERATOR

Manager

TITLE

Ridgeview RDF

WM RECEIVING FACILITY

Que El-Amin

PRINT NAME

Scott Crawford, Inc.

COMPANY NAME

May 10, 2023

DATE

**NOTE: Generators are required to make a good faith effort to comply with all applicable regulations and may be subject to enforcement action if their determination is incorrect. EPA's PCB Penalty Policy states: "The lack of knowledge that the Agency has no intention of encouraging ignorance of the PCB rules. The test will be whether the violator knew or should have known of the relevant requirement or the possible dangers of his actions. As a general matter, any electric utility, and any company with PCBs, is deemed to have knowledge of all aspects of TSCA and the PCB regulation. TSCA is a strict liability statute, and there is no requirement that a violator's conduct be negligent, willful or know**

1. Are the PCBs detected in the waste the result of a spill of PCBs that occurred prior to April 18, 1978 and the actual PCB concentration of the waste is less than 50 PPM?

- Yes (Please provide supporting documentation.\* No further questions.)  
 No (Please proceed to Question 2)  
 Following a diligent investigation of available information, I am unable to locate any information which indicates that a spill of PCBs occurred subsequent to April 18, 1978 or that the original source was  $\geq 50$  ppm.

2. Did the spill of PCB material in the waste occur on or after April 18, 1978 and the source was an authorized source with PCBs less than 50 PPM?

- Yes (Please provide supporting documentation.\* No further questions.)  
 No (Please proceed to Question 3)  
 Following a diligent investigation of available information, I am unable to locate any information which indicates that the original source was unauthorized or  $\geq 50$  ppm PCBs and the actual PCB concentration of the waste is  $< 50$  ppm PCBs.

3. Does the material as generated meet the definition of a PCB Remediation Waste as defined in 40 CFR 761.3? Note: 40 CFR 761.50(b)(3)(iii) The owner or operator of a site containing PCB remediation waste has the burden of proving the date that the waste was placed in a land disposal facility, spilled, or otherwise released into the environment, and the concentration of the original spill.

- Yes (If yes, disposal must be in accordance with 40 CFR 761.61. Please select applicable disposal option below.)\*\*  
 No (Please proceed to Question 4)

#### PCB REMEDIATION WASTE APPLICABLE DISPOSAL OPTION:

- Managed under 40 CFR 761.61(a) Self-Implementing Plan (Please provide SIP and EPA approval if received\*\*\*)  
 Managed under 40 CFR 761.61(b) Performance-Based Option (Subtitle C with TSCA Authorization disposal only)  
 Managed under 40 CFR 761.61(c) Risk-Based Plan (Please provide Plan and EPA approval)

4. Does the material as generated meet the definition of PCB Bulk Product Waste as defined in 40 CFR 761.3\*\*?

- Yes (Please specify applicable clean-up option below)  
 No (Please provide WM with detailed description regarding the waste and the process generating it. Describe what the source of PCBs is and how the PCBs came to be in the waste. Examples: Excluded PCB Products, PCB Liquids, PCB Items, PCB Household Waste, Natural Gas Pipeline Wastes, PCB R&D Waste, PCB/Radioactive Waste, Porous Surfaces).

#### PCB BULK PRODUCT WASTE APPLICABLE CLEAN-UP OPTION:

- The waste covered by this certification is PCB bulk product waste regulated under 761.62(b)(1)(i) such as plastics; preformed or molded rubber parts or components; applied dried paints, varnishes, waxes, or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; non-liquid PCB bulk product waste from the shredding of automobile or household appliances from which PCB small capacitors have been removed prior to shredding, or intact non-leaking fluorescent light ballasts. Based on analysis of the waste in the shipment or general knowledge of the waste stream (or similar material), this waste may include components containing PCBs at greater than or equal to 50 ppm. (Attach supporting documentation.\*)
- The waste covered by this certification is other PCB bulk product waste as regulated under 761.62(b)(1)(ii) and, based on sampling conducted in accordance with the protocols set out in Subpart R of Part 761, leaches at less than 10 micrograms per liter (ug/L) of water measured using a procedure used to simulate leachate generation. This waste, based on analysis of the waste in the shipment or general knowledge of the waste stream (or similar material), may include components containing PCBs at greater than or equal to 50 ppm. (Attach supporting documentation.\*)
- The waste covered by this certification is PCB bulk product waste OTHER THAN that described in either category above (e.g. paper or felt gaskets contaminated by liquid PCBs) and is regulated under 761.62(b)(2). Based on analysis of the waste in the shipment or general knowledge of the waste stream (or similar material), this waste may include components containing PCBs at greater than or equal to 50 ppm. (Attach supporting documentation.\*)

\* Sampling and reporting PCB concentrations in samples must be done in accordance with 40 CFR 761 Subpart R.

\*\* Generator must provide written notice to disposal facility at least 15 days prior to first shipment for either PCB Remediation Wastes managed under a SIP or PCB Bulk Product Wastes. Completing the applicable sections above and signing this form in conjunction with completed WM EZ Profile may serve as your 15-day notification. Total quantity to be shipped and highest PCB concentration must be provided.

\*\*\*By signing this form, the generator confirms that the attached self-implementing notification was submitted to the applicable regulatory authority for approval 30 days prior to the commencement of cleanup activity. The regulatory authority either approved or did not respond within 30 days of receiving the notification; therefore, it is assumed that the notification is approved.

## PCB CERTIFICATION FOR SUBTITLE D FACILITIES AND SUBTITLE C NON-TSCA FACILITIES

This form is intended to support waste characterization into a Subtitle D or a Non-Toxic Substances and Control Act (TSCA) Approved Subtitle C facility for non-PCB wastes (e.g. non-TSCA wastes), certain TSCA-Regulated PCB Remediation Wastes, or certain TSCA-Regulated PCB Bulk Product Wastes.

**Non-TSCA Wastes:** PCB-contaminated wastes for which the source PCB concentration was less than 50 ppm are not regulated under TSCA. This includes certain PCB manufacturing processes and products which appear at concentrations less than 50 ppm. See 40 CFR 761.3, *Excluded Manufacturing Processes and Excluded PCB Products*. See also EPA's *Final PCB Aesthetic Concentration*, 76 FR 61610, 61611.

**PCB Remediation Waste** is defined in 40 CFR 761.3 with specific disposal options identified in 40 CFR 761.61. In general, PCB Remediation Waste means waste containing PCBs as a result of a spill, release, or other unauthorized disposal at the following concentrations:

- Materials disposed of prior to April 18, 1978, that are currently at concentrations  $\leq 50$  ppm PCBs, regardless of the concentration of the original spill;
- materials which are currently at any volume or concentration where the original source was  $\leq 500$  ppm PCBs beginning on April 19, 1978, or  $\leq 50$  ppm PCBs beginning on July 2, 1979; and
- materials which are currently at any concentration if the PCBs are spilled or released from a source not authorized for use under this part.

**PCB Remediation Waste** means soil, rags, and other debris generated as a result of any PCB spill cleanup, including, but not limited to:

- Environmental media containing PCBs, such as soil and gravel;
- Dredged materials, such as sediments, settled sediment fines, and aqueous decantate from sediment;
- Sewage sludge containing  $<50$  PPM PCBs and not in use according to 40 CFR 761.20(a)(4);
- PCB sewage sludge;
- Commercial or industrial sludge contaminated as the result of a spill of PCBs including sludges located in or removed from any pollution control device;
- Aqueous decantate from an industrial sludge.
- Buildings and other man-made structures (such as concrete floors, wood floors, or walls contaminated from a leaking PCB or PCB-Contaminated Transformer), porous surfaces, and non-porous surfaces.
- Personal Protective Equipment (PPE) or other solid cleaning material with any concentration of PCBs generated as a result of any PCB remediation waste spill cleanup.

The PCB regulations for disposal of PCB Remediation Waste allow generators to manage the waste under three specific scenarios: 1) Self-implementing on-site cleanup and disposal; 2) Performance-based disposal, or 3) Risk-based disposal.

**PCB Bulk Product Waste** is defined in 40 CFR 761.3 with specific disposal options identified in 40 CFR 761.62. PCB Bulk Product Waste means waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal was  $\leq 50$  ppm PCBs. PCB bulk product waste does not include PCBs or PCB items regulated for disposal under 40 CFR 761.61, 761.63, or 761.64. PCB bulk product waste includes, but is not limited to:

- Non-liquid bulk wastes or debris from the demolition of buildings and other man-made structures manufactured, coated, or serviced with PCBs. PCB bulk product waste does not include debris from the demolition of buildings or other man-made structures that is contaminated by spills from regulated PCBs which have not been disposed of, decontaminated, or otherwise cleaned up in accordance with subpart D of this part.
- PCB-containing wastes from the shredding of automobiles, household appliances, or industrial appliances.
- Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; adhesives; paper; Galbestos; sound deadening or other types of insulation; and felt or fabric products such as gaskets.
- Fluorescent light ballasts containing PCBs in the potting material.

On October 4, 2011, the SE PA issued a memorandum titled "PCB Bulk Product Waste Reinterpretation". The reinterpretation provides the ability to dispose of any building material, contaminated by adjacent PCB bulk product waste (e.g., caulk, paint, mastics, and sealants), in accordance with the PCB bulk product waste regulations.

- The migration of PCBs from PCB bulk product waste, such as caulk or paint, can occur to the surrounding building materials. This reinterpretation allows building material "coated or serviced" with PCB bulk product waste (e.g., caulk, paint, mastics, and sealants) at the time of designation for disposal to be managed as a PCB bulk product waste, even if the PCBs have migrated from the overlying bulk product waste to the substrate (i.e., building materials), provided there is no other source of PCB contamination on or in the substrate (i.e., building materials). The PCB contamination can only be from the PCB bulk product waste and not from another source (e.g., PCB transformer).
- Conversely, PCB-contaminated building material (i.e., substrate) from which a PCB bulk product waste has been removed (i.e., no longer attached to the building materials) would be considered a PCB remediation waste. Contaminated building materials that remain in place, after the PCB bulk product waste (e.g., caulk, paint, mastics, and sealants) has been removed, continue to be considered and managed as PCB remediation waste. For example, if the PCB material has already been removed or flaked off at the time of designation for disposal, the building material would be deemed a PCB remediation waste.

**From:** Beggs, Tauren R - DNR  
**Sent:** Friday, May 12, 2023 12:50 PM  
**To:** ramanauskas.peter@epa.gov  
**Subject:** Questions Regarding PCBs for Bright Horizon Properties LLC (Former), BRRTS # 02-36-589295, 1702 13th St, Two Rivers, WI

Hi Peter,

Just wanted to provide a FYI email to you for this site. I need to get the PCB notice over to you for this case that was opened in Two Rivers, WI. Before I finalize that I have some questions for you regarding classification of this site and some questions related to a redevelopment that is in the planning stages, so I will look at trying to set up a time to chat with you next week.

The environmental consultant for this site is going to get me some more data and figures regarding the PCBs on-site early next week, so I have their most recent sample data. This is a former industrial site that is planned to get redeveloped into multi-family residential. They are in the planning stages and will be submitting a redevelopment plan soon. I will go through more of the background on a call with you, but there is one sampling location area with elevated PCBs. Multiple samples have been collected within that same location area and around it and they couldn't confirm the high level of PCBs. All other PCB samples that have been collected on the property are well below 1ppm.

Have a nice weekend,

**We are committed to service excellence.**

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

**Tauren R. Beggs**

Hydrogeologist & Northeast Region Land Recycling Expert

Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Ave

Green Bay, WI 54313

Phone: (920) 510-3472

[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov) (preferred contact method during work at home)

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