

**Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request**

Form 4400-237 (R 10/21)

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Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do not use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Jones	First Kristin	MI	Organization/ Business Name Newell Operating Company
Mailing Address 6655 Peachtree Dunwoody Road		City Atlanta	State GA
		ZIP Code 30328	
Phone # (include area code) (404) 353-2958	Fax # (include area code)	Email Kristin.Jones@newellco.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Successor to the environmental liability of former owner/operator Mirro Aluminum Company

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name
Mailing Address		City	State
		ZIP Code	
Phone # (include area code)	Fax # (include area code)	Email	

Environmental Consultant (if applicable)

Contact Last Name Tarvin	First Jeanne	MI	Organization/ Business Name Ramboll Americas Engineering Solutions, Inc.
Mailing Address 234 W. Florida Street, Fifth Floor		City Milwaukee	State WI
		ZIP Code 53204	
Phone # (include area code) (262) 901-0085	Fax # (include area code)	Email jtarvin@ramboll.com	

Attorney (if applicable)

Contact Last Name Sawula	First Andrew	MI	Organization/ Business Name AerntFox Schiff
Mailing Address One Westminster Place, Suite 200		City Lake Forest	State IL
		ZIP Code 60045	
Phone # (include area code) (847) 295-4336	Fax # (include area code)	Email andrew.sawula@afslaw.com	

Property Owner (if different from requester)

Contact Last Name El-Amin	First Que	MI	Organization/ Business Name West River Lofts, LLC
Mailing Address 4201 N. 27th Street		City Milwaukee	State WI
		ZIP Code 53216	
Phone # (include area code) (414) 678-1723	Fax # (include area code)	Email que@scott-crawford.com	

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Section 2. Property Information

Property Name West River Lofts, LLC (Former Bright Horizon Properties, LLC)		FID No. (if known) 436010300		
BRRTS No. (if known) 02-36-589295	Parcel Identification Number 05300008301104			
Street Address 1621 14th Street		City Two Rivers	State WI	ZIP Code 54241
County Manitowoc	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Two Rivers	Property is composed of: <input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres 3.15	

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: 03/15/2024

Reason: To maximize construction window for 2024 site redevelopment by the property owner.

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4. Request for Liability Clarification (cont.)

- Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**
 - (1) a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**
- No Action Required (NAR) - NR 716.05, [682]
- ❖ **Include a fee of \$700.**
- Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.
- Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]
- ❖ **Include a fee of \$700.**
- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/lgu.html#tabx4.

- Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
- ❖ **Include a fee of \$1400, and the information listed below:**
 - (1) a draft schedule for remediation; and,
 - (2) the name, mailing address, phone and email for each party to the agreement.

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Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: PFAS Focused NR 716 Site Investigation Work Plan

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: Newell Operating Company
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Jeanne M. Tai
Signature

February 26, 2024
Date Signed

E&H Americas Country Market Director
Title

(262) 901-0085
Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

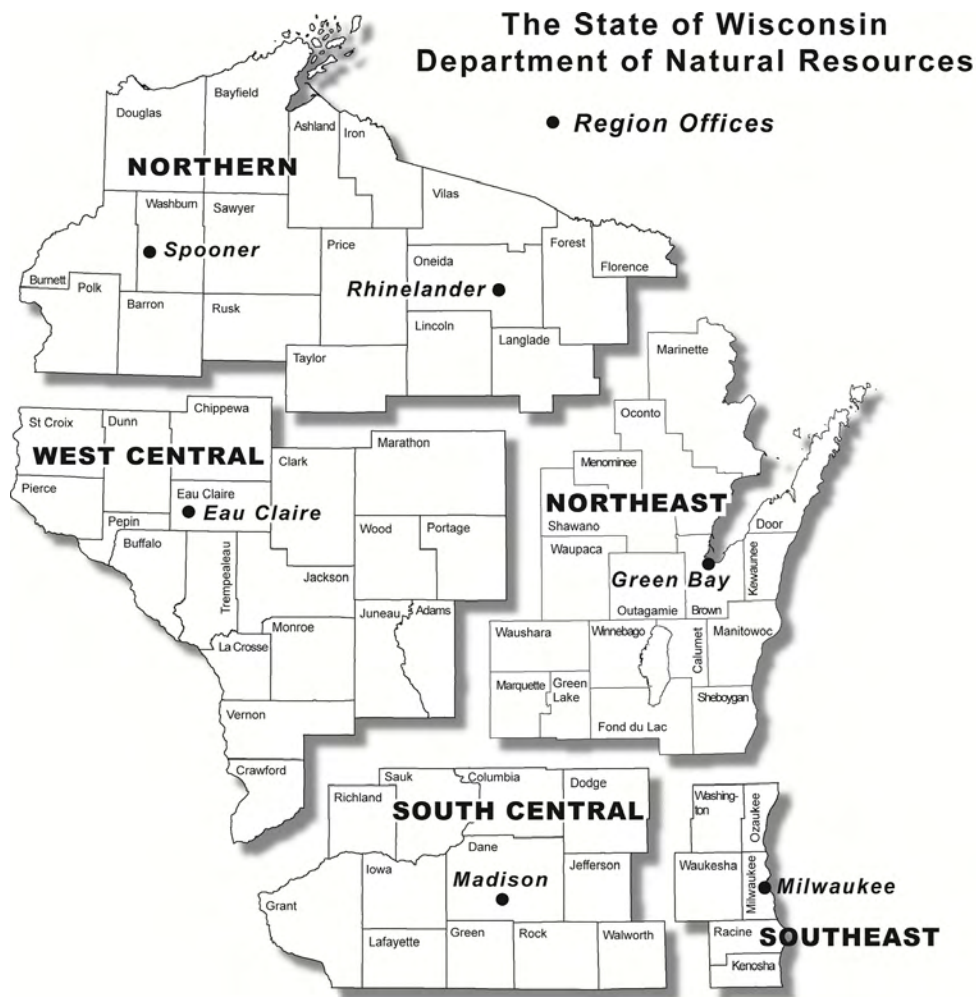
DNR NORTHERN REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2984 Shawano Avenue
 Green Bay WI 54313

DNR SOUTH CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 3911 Fish Hatchery Road
 Fitchburg WI 53711

DNR SOUTHEAST REGION
 Attn: RR Program Assistant
 Milwaukee DNR Office
 1027 West St. Paul Ave
 Milwaukee WI 53233

DNR WEST CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 1300 Clairemont Ave.
 Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



Sent via E-Mail and WAMS

Mr. Tauren Beggs
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

**PFAS FOCUSED NR 716 SITE INVESTIGATION WORK PLAN
WEST RIVER LOFTS, LLC, 1621 14TH STREET, TWO RIVERS, WISCONSIN
(PORTION OF BRIGHT HORIZON PROPERTIES, LLC [FORMER]
1702 13TH STREET); WDNR BRRTS NO. 02-36-589295**

Dear Mr. Beggs:

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), is submitting this PFAS Focused NR 716 Site Investigation Work Plan (the "Work Plan") to conduct additional investigation activities related to per- and polyfluoroalkyl substances (PFAS) detected in groundwater at the West River Lofts, LLC (WRL) property located at 1621 14th Street (former Mirro Plant No. 4) in Two Rivers, Wisconsin (the "Site"). This Work Plan is intended to investigate the detection of PFAS in one temporary groundwater monitoring well at the Site.

February 26, 2024

Ramboll
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA

A completed Technical Assistance Request (Form 4400-237) and associated review fee (Check No. 194011137) are being provided to secure your review of, and concurrence with, the site investigation activities presented in the attached Work Plan. If you have any questions, please do not hesitate to contact us at any time.

T +1 414 837 3607
F +1 414 837 3608
www.ramboll.com

Ref. 1690026868

Yours sincerely,

Paul Lindquist
Managing Consultant

D +1 262 901 3510
plindquist@ramboll.com

Jeanne M. Tarvin, PG,
E&H Americas Country Market Director

D +1 262 901 0085
jtarvin@ramboll.com

cc: Kristin Jones, NOC (electronic copy)
Gabriel Rodriguez, ArentFox Schiff
Andrew Sawula, ArentFox Schiff

Enclosures

PFAS Focused NR 716 Site Investigation Work Plan

PFAS FOCUSED NR 716 SITE INVESTIGATION WORK PLAN

WEST RIVER LOFTS, LLC
1621 14TH STREET, TWO RIVERS, WISCONSIN
(PORTION OF BRIGHT HORIZON PROPERTIES LLC
[FORMER] 1702 13TH STREET)

BRRTS NO. 02-36-589295
FID NO. 436010300

Intended for:

Wisconsin Department of Natural Resources
Green Bay, Wisconsin

Prepared for:

Newell Operating Company

Prepared by:

Ramboll Americas Engineering Solutions, Inc.

Date:

February 26, 2024

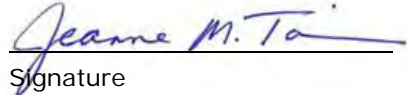
Project Number:

1690026868



CERTIFICATION

I, Jeanne M. Tarvin, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.



Signature

February 26, 2024
Date

Title: E&H Americas Country Market Director
License Number 307-13

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- Figure 1: Site Location
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APPENDICES

- Appendix A: Historical Sanborn Insurance Maps

Ramboll
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USA
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www.ramboll.com

1. INTRODUCTION

Ramboll Americas Engineering Solutions, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), is submitting this *PFAS Focused NR 716 Site Investigation Work Plan* (the “Work Plan”) to conduct additional investigation activities related to per- and polyfluoroalkyl substances (PFAS) detected in groundwater at the West River Lofts, LLC (WRL) property located at 1621 14th Street in Two Rivers, Wisconsin (the “Site”). This Work Plan has been prepared in conformance with Wisconsin Administrative Code (WAC) Chapter NR 716 and is intended to investigate the detection of PFAS in one temporary groundwater monitoring well at the Site. Other identified contaminants in affected environmental media have been investigated at the Site by Fehr Graham Engineering & Environmental (Fehr Graham), on behalf of WRL, and Stantec Consulting Services, Inc. (Stantec), on behalf of the City of Manitowoc. This Work Plan presents a brief summary of site background information, the proposed focused site investigation approach, scope of work, and schedule.

1.1 Site Location and Description

The Site is located at 1621 14th Street, City of Two Rivers, Manitowoc County, Wisconsin (Figure 1 and Figure 2). Prior to 2023, the Site was part of a broader property owned by Bright Horizon Properties, LLC (Bright Horizons) which utilized an address of 1702 13th Street and included the existing industrial building, a vacant vegetated area to the east, and an asphalt parking area to the north and east (the “Property”). In 2023, the Property was divided into two parcels. Bright Horizon retained ownership of the western portion (parcel number 05300008301103, 2.51 acres), which included the industrial building and a part of the parking lot (“BH Parcel”), and WRL purchased the eastern and northern portion (parcel number 05300008301104, 3.15 acres), which comprises the Site. The City of Two Rivers maintains an asphalt recreation pathway along the West Twin River.

The Site is located in the northeast ¼ of the southwest ¼ of Section 1, Township 19 North, Range 24 East and is bordered to the north and east by the West Twin River (formerly the Neshotah River); to the west by an industrial building (1702 13th Street), a parking lot, and commercial properties; and to the south by 13th Street. Historically, Monroe Street bisected the Property; however, according to available Sanborn Insurance (“Sanborn”) maps, between 1952 and 1961, the road was eliminated and appropriated into the property (Appendix A). The Wisconsin Transverse Mercator (WTM) coordinates obtained from the Wisconsin Department of Natural Resources (WDNR) RR Site Maps are as follows: X Coordinate (WTM91) 714283 and Y Coordinate (WTM91) 410918. The site layout is presented in Figure 2.

The surrounding property uses are a mixture of residences and commercial properties to the west and southwest and industrial properties to the south and southeast. The West Twin River is located immediately to the north and east. Lake Michigan is located approximately 1,200 feet to the southeast of the Site. According to the City of Two Rivers, the Site is currently zoned “Waterfront Business District.”

1.2 Involved Parties

The following parties are involved in the PFAS focused investigation:

Site Owner: West River Lofts, LLC
 4201 North 27th Street
 Milwaukee, WI 53132
 Contact: Que El-Amin, (414) 678-1723, que@scott-crawford.com

Former Owner/Operator: Newell Operating Company (as successor to the environmental liability of former owner/operator Mirro Aluminum Company)
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Contact: Kristin Jones, (404) 353-2958, Kristin.Jones@newellco.com

NOC's Consultant: Ramboll Americas Engineering Solutions, Inc.
234 W. Florida Street, Fifth Floor
Milwaukee, WI 53204
Contact: Jeanne Tarvin, (262) 901-0085, jtarvin@ramboll.com

Agency: Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727
Contact: Tauren Beggs, (920) 510-3472, tauren.Beggs@wisconsin.gov

Prior owners who are not participating in site investigation activities include, but are not limited to, Bright Horizons and Eggers Industries, Inc. ("Eggers").

2. PROJECT BACKGROUND

The following sections present a general overview of the site development, ownership history, Bureau for Remediation and Redevelopment Tracking System (BRRTS) database evaluation, and site environmental investigation history.

2.1 Site Development and Ownership History

The initial date of site development is unknown. Based on Sanborn maps included in the *Phase I Environmental Site Assessment* (ESA) prepared by Fehr Graham in 2021 (Fehr Graham, 2021), in 1885, a sawmill operated by Two Rivers Manufacturing Company occupied the eastern portion of the Property near the river, with the western portion of the Property remaining undeveloped. Over time, the Sanborn maps reflect that Two Rivers Manufacturing Company manufactured chairs at the Property, and its operations included a paint shop. The 1913 Sanborn map reflects that Standard Aluminum Company operated on portions of the Property. The next map, dated 1922, reflects that Aluminum Goods Manufacturing Company had replaced and expanded upon Standard Aluminum Company's operation at the Property. Other occupants were also present at that time. For example, the 1913 and 1922 Sanborn maps identify that one building was occupied by the M. Freidlander Mfg. Co. Mitten Factory and by Tremmel Art Glass Wks.

In 1957, the Aluminum Goods Manufacturing Company was renamed Mirro Aluminum Company ("Mirro"). NOC's parent company acquired Mirro in 1983. In 1984, the City of Two Rivers purchased the Property and then sold it to Eggers. According to building plans and permits presented in the 2021 Phase I ESA and briefly discussed in the *Historical Use and Ownership Assessment to Determine Potentially Responsible Parties* (Fehr Graham, 2022a) (the "2022 Historical Use document"), Eggers utilized the western warehouse building between 1984 and 2018 to manufacture specialty wood products (e.g., doors, tabletops, building products, etc.) and may have completed painting in the western warehouse building (present day BH Parcel). According to the 2022 Historical Use document, Eggers demolished site buildings beginning in the second half 1985 and concluding in 1986.

In 2018, the Property was sold to Bright Horizons. According to the 2021 Phase I ESA, Bright Horizons utilized the western warehouse for storage of brass, pallets, and dry storage. During a site visit completed by Ramboll on February 6, 2024, the building included signage for “Cores N More, LLC” and “DRAMM Co.” In 2022, the Property was subdivided, and the eastern portion (the Site) was sold to WRL. WRL has indicated that it intends to construct a multi-family residential housing building at the Site.

Currently, the Site is vacant and vegetated with a public paved walkway along the river and the northwestern portion of the Site is paved with parking spaces. The general site layout and property boundaries are included as Figure 2.

2.2 Environmental Investigation History

A review of the WDNR BRRTS on the Web (BOTW) database identified two reported cases at the Site, with only one open Environmental Repair Program (ERP) case (BRRTS No. 02-36-589295). Activities related to the closed ERP case (BRRTS No. 02-36-521430) took place between 2003 and 2007, when Eggers owned the Site. Subsections 2.2.1 and 2.2.2 provide a brief summary of the records filed under the BRRTS cases associated with the Site.

2.2.1 Closed ERP Case – WisDOT/Eggers Industries West PLT (BRRTS No. 02-36-521430)

In 2003, impacted soil and groundwater was found during environmental site investigation activities completed by Strand Associates Inc. (Strand), on behalf of WisDOT, associated with planned road and bridge construction activities connecting Madison Street and 16th Street. Soil samples collected from the fill material and near the water table exceeded WAC NR 720 residual contaminant levels (RCLs) for petroleum volatile organic compounds (PVOCs), including naphthalene and trimethylbenzenes. Diesel range organics (DRO) were also detected near the PVOC concentrations. In 2004, Robert E. Lee & Associates, Inc. (Robert E. Lee) completed further site investigation activities, including the installation of permanent groundwater monitoring wells to delineate the soil impacts detected in 2003. Groundwater analytical data collected from two temporary monitoring wells (2003 investigation) and two permanent monitoring wells (2004 investigation) detected naphthalene, trimethylbenzenes, or tetrachloroethene (PCE) above the WAC NR 140 preventative action limit (PAL), but below the WAC NR 140 enforcement standards (ES). Closure was granted in 2006 with continuing obligations for cap maintenance to prevent direct contact with underlying impacted soil and prevent surface water infiltration, WAC NR 140 PAL exemption for groundwater, and geographic information system (GIS) database registration for soil and groundwater impacts. The approximate limits of the cap maintenance area are included on Figure 2.

2.2.2 Open BRRTS Case – Bright Horizon Properties LLC (Former) (BRRTS No. 02-36-589295)

In 2021, Scott Crawford, Inc. retained Fehr Graham to complete a Phase I and Phase II ESA of the Site. Based on data obtained during the Phase II ESA, a *Notification of Hazardous Substance Discharge* (WDNR Form 4400-225) was submitted to the WDNR on February 22, 2022. Based on this notification, the WDNR issued an Responsible Party (RP) letter to WRL on March 4, 2022, as the then current owner of the Site. On March 11, 2022, Fehr Graham submitted the 2022 Historic Use document to the City of Two Rivers and WDNR, evaluating the historic use and prior owners of the property. On March 22, 2022, the WDNR issued NOC a RP letter. NOC responded to the RP letter on April 22, 2022.

On June 22, 2022, Fehr Graham, on behalf of WRL, submitted a *Site Investigation Work Plan* (the “FG SIWP”) (Fehr Graham, 2022b) to the WDNR. As part of the FG SIWP, seven tasks were proposed

including wetland delineation, additional soil and groundwater investigation activities, vapor intrusion (VI) investigation activities, surface water and sediment evaluation, an emerging contaminants evaluation, and development of a Site Investigation Report. On July 29, 2022, the WDNR issued an approval letter to the Work Plan; however, the WDNR requested expansion of the investigation activities.

On September 30, 2022, Stantec, on behalf of the City of Manitowoc¹, submitted a *Site-Specific Sampling and Analysis Plan* (the "Stantec SSSAP") (Stantec, 2022) which addressed comments provided in the July 2022 WDNR response letter concerning the FG SIWP and proposed additional investigation tasks to supplement the scope of work previously proposed by Fehr Graham. Based on documents available on the WDNR BOTW database, it does not appear that the WDNR responded or provided comment to the Stantec SSSAP. Work related to the additional site investigation activities were completed between September 2022 and January 2023. On July 11, 2023, Stantec submitted a *Site Investigation Addendum* (Stantec, 2023) to the WDNR which summarized all work completed by Stantec and incorporated the work completed by Fehr Graham prior to September 2022.

On June 5, 2023, Fehr Graham submitted a *Materials Management Plan & Chapter NR 718 Exemption Request* (the "FG MMP") (Fehr Graham, 2023a) and *Sub-Slab Vapor Mitigation Design* (Fehr, Graham, 2023b) drawing package to the WDNR for review. Based on the information provided in the FG MMP, the site investigation activities completed by Stantec for the Stantec SSSAP were shared with Fehr Graham to develop the FG MMP and WAC NR 718 exemption request. The FG MMP described the site redevelopment plans, provided details regarding performance of limited targeted remedial excavations, discussed on site relocation of select soils during the redevelopment, and included placement of a 24-inch clean soil cover over the balance of the unpaved redevelopment area. On June 20, 2023, Fehr Graham submitted an *Addendum to Materials Management Plan and Chapter NR 718 Exemption Request* (the "FG Addendum MMP") (Fehr Graham, 2023c) to provide the WDNR with their excavation confirmation sampling rationale. On June 29, 2023, the WDNR approved the FG MMP and FG Addendum MMP; however, the WDNR provided several clarifications relating to the approval including the need for PFAS sampling.

On October 6, 2023, Fehr Graham installed one temporary monitoring well (TW-82) and collected a groundwater sample. Fehr Graham submitted the groundwater sample from TW-82, a field blank sample, and equipment blank to Pace Analytical Services, LLC for PFAS analysis using analytical method "ENV-SOP-MIN4-0178." Four PFAS were detected in the groundwater sample collected from TW-82. Perfluoropentanoic acid (PFPeA) was detected at a concentration of 6.2 nanograms per liter (ng/L). Perfluorooctanoic acid (PFOA) was detected at an estimated concentration of 3.7 ng/L and qualified by the laboratory with a "J." Perfluorobutanesulfonic acid (PFBS) was detected at an estimated concentration of 3.3 ng/L (3.3 J ng/L). Perfluorooctanesulfonic acid (PFOS) was detected at a concentration of 269 ng/L. Based on these results, a *Notification of PFAS Contamination* document was submitted to the WDNR by Fehr Graham on October 30, 2023.

On December 1, 2023, the WDNR sent a *Status Update Request* letter to NOC asking for a written status update concerning NOC working with the property owner, WRL, "to investigate and clean up contamination" associated with the detection of PFAS in groundwater. On January 29, 2024, Ramboll,

¹ According to Stantec, the supplemental environmental work was completed "using funds from the City of Manitowoc Community-Wide Assessment Grant awarded to the City [of Manitowoc] by the United States Environmental Protection Agency (USEPA)." According to an e-mail provided by Stantec, the USEPA granted approval on September 26, 2022.

on behalf of NOC, provided the requested status update, including the development of this PFAS Focused Work Plan and the request to conduct a site visit with WRL.

On February 6, 2024, Ramboll, WRL, and representatives from the City of Two Rivers completed a site walk to verify current site conditions, accessibility for subsurface drilling activities, and proposed sampling locations. Based on Ramboll's observations from the site visit, all monitoring wells, except for two monitoring well locations, appeared to have abandoned. The two remaining wells, based on prior site figures from Fehr Graham and Stantec, appear to be MW-1 and TW-82.

On February 7, 2024, the WDNR provided an e-mail response to the January 29, 2024, NOC status update, asking NOC to submit a Work Plan within 30 days.

3. SITE SETTING

The general site setting is described in this section.

3.1 Geologic and Hydrogeologic Setting

The regional site geologic stratigraphy primarily consists of unconsolidated glacial deposits overlying Silurian Niagara dolomite bedrock. The unconsolidated glacial deposits vary in thickness and type throughout Manitowoc County. Based on information available through the WDNR Well Driller Viewer GIS interactive map, the depth to bedrock in the area varies between 86 to 99 feet below ground surface (bgs). Based on available information, bedrock was not encountered in the deepest borings completed at the Site (SB-71 and TW-82), which were advanced to a depth of 20 feet bgs.

Locally, based on information obtained during previous investigations performed by Fehr Graham and Stantec, surficial deposits at the Site include anthropogenic or urban fill (gravel and reworked fine sand/silt) generally extending to depths of 3 to 7.5 feet bgs. In some locations, the fill was documented to contain brick, wood, "chunks of coal," and "black contaminated sand." A maximum fill depth of 7.5 feet bgs was reported during the installation of soil boring MW-9 which is located in the southeast portion of the Property near the former railroad easement. The fill material at the Site is generally reported to be underlain by sand, sand with silt, and then silt. The topography of the Site is generally flat and slopes towards the West Twin River.

Based on recent documents available on the WDNR BOTW database associated with the WRL redevelopment activities, approximately 34 groundwater monitoring wells have been installed at the Site to date as part of site investigation activities. Groundwater was encountered in site monitoring wells at depths ranging from approximately 4 to 10 feet bgs. Shallow groundwater flow has been interpreted by Fehr Graham and Stantec to be to the southwest. However, this is inconsistent with the groundwater flow observed in the northern portion of the Property in 2004 by Robert E. Lee during WisDOT investigation activities (closed BRRS No. 02-36-521430). The Site Investigation Report completed by Robert E. Lee described shallow groundwater flow to the northeast towards the West Twin River. Due to the presence of features installed along the West Twin River shoreline (e.g., driven sheet pile walls, riprap, and concrete walls) and subsurface utilities (e.g., sanitary sewers and storm sewers), the groundwater flow direction may vary on site.

3.2 Potential Migration Pathways and Receptors

The Site is currently vacant with no structures present. The groundwater beneath the Site is considered a potential contaminant migration pathway; however, the Site and neighboring properties

are connected to municipal water provided by the City of Two Rivers water utility. The City of Two Rivers obtains its drinking water from Lake Michigan.

Subsurface utilities that could represent contaminant migration pathways include nearby municipal water, storm sewer and sanitary sewer lines, and natural gas lines. The Site is currently vacant and vapor intrusion is not a current pathway of concern. However, based on plans to redevelop the Site with a multifamily residential structure and WDNR approval of a sub-slab vapor mitigation system design and sampling plan for the future structure, the vapor migration pathway will be interrupted and addressed through engineering controls.

4. OVERVIEW OF FOCUSED SITE INVESTIGATION APPROACH AND STRATEGY

The objectives for the focused site investigation activities are to further evaluate the following in accordance with WAC NR 716:

- confirm the detection of PFAS in groundwater and evaluate the potential extent of impacts;
- evaluate unsaturated soils within the direct contact interval for PFAS;
- gain a better understanding of the hydrogeology of the shallow aquifer; and
- gather information regarding the potential source(s) of PFAS.

The results from the work outlined above will be presented in a *Focused Site Investigation Report* (the "Focused SIR").

5. ADDITIONAL SITE INVESTIGATION WORK PLAN

The following section presents a description of the work to be completed during the PFAS focused site investigation. The contents of this section were prepared in accordance with WAC NR 716.

5.1 Pre-Site Investigation Activities

5.1.1 Health and Safety

A site-specific Health and Safety Plan (HASP) will be developed in accordance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910 for the proposed field activities. Ramboll will review the HASP with all field personnel prior to commencing the field activities.

5.1.2 Utility Mapping and Investigation Planning

Prior to initiating site investigation activities, historical drawings, redevelopment documents, and other available figures will be reviewed to evaluate utility locations and depths, and site-specific redevelopment plans. Ramboll will also request City of Two Rivers files for additional drawings, if available. This information will be incorporated into figure development for the Focused SIR.

5.1.3 Site Access

WRL and NOC representatives are currently working to establish an access agreement for performance of the work described in Section 5.2.

5.2 Soil Investigation and Monitoring Well Installation Activities

5.2.1 Utility Clearance

Prior to conducting intrusive site investigation activities, utility mark-outs will be coordinated through Diggers Hotline. Ramboll will also contract with a private utility locator to complete a geophysical survey (e.g., using ground-penetrating radar) to identify subsurface utilities and confirm their location prior to initiating any intrusive work in the areas where subsurface investigation activities will occur. Proposed sampling locations may be modified to avoid subsurface and overhead utilities or other obstructions, as appropriate.

5.2.2 Soil Sampling and Monitoring Well Installation

Five soil borings will be advanced to depths of approximately 15 feet bgs. Soil boring locations were selected to confirm and delineate the prior detection of PFAS in one temporary monitoring well in shallow groundwater at the Site based on available information and redevelopment plans. Based on historical subsurface conditions encountered during prior site investigations, a direct push drill rig capable of turning augers will be utilized. All soil borings will be completed as WAC NR 141 groundwater monitoring wells. Special precautions for installing wells for PFAS sampling will be employed. The proposed boring/monitoring well locations are depicted on Figure 3 and are intended to confirm the original PFAS and assess the potential extent of these impacts, if present. These proposed locations may be modified slightly based on conditions encountered in the field or based on any modifications to the redevelopment plan.

Soil samples will be continuously collected from the borings for visual observation and field screening. Soil samples will be screened in the field with a photoionization detector (PID) equipped with a 10.6 electron volt (eV) lamp for the presence of VOCs. Soil characteristics (e.g., texture, color), PID readings, and visual and/or olfactory evidence of impacts will be recorded on soil boring logs.

Up to one unsaturated soil sample will be collected from each soil boring location from the 1 to 3 foot bgs interval to assess the direct contact pathway for PFAS. Soil boring locations, including locations identified for soil sampling, are shown on Figure 3.

The soil samples will be collected and placed in appropriately preserved, laboratory-supplied containers. After the samples have been collected, they will be sealed, labeled, and placed on ice pending delivery under chain-of-custody procedures to the laboratory for analysis.

The soil samples will be submitted to a Wisconsin-certified laboratory, for standard turn-around time analysis. Soil samples will be analyzed for PFAS (State of Wisconsin list of 33 analytes) using Modified United States Environmental Protection Agency (USEPA) Method 537 (537M). Detected contaminants in the direct contact interval (0 to 4 feet bgs) will be compared to WAC NR 720 RCLs for soil.

The groundwater monitoring wells will be constructed in accordance with WAC NR 141 requirements using 2-inch diameter, flush thread Schedule 40 polyvinyl chloride (PVC) riser pipe, and 10 feet of 2-inch diameter PVC factory cut (0.010-inch) slotted well screen. Coarse silica filter sand packs will be placed from the bottom of the boreholes to 1 to 2 feet above the top of the well screens. Following placement of the coarse sand packs, 1 to 2 feet of fine sand pack will be placed, followed by bentonite chips or slurry to ground surface. Each monitoring well will be completed aboveground within a lockable, secure casing set in concrete.

Groundwater monitoring wells will be developed in accordance with WAC NR 141 to remove residual materials remaining in the wells after installation and to re-establish the natural hydraulic flow conditions of the formations, which may have been disturbed by the well construction.

Upon completion of the groundwater monitoring well installation activities, the location of each groundwater monitoring well will be surveyed. The top of casing elevations and ground surface elevations of the new monitoring wells and piezometers will be surveyed to vertical accuracies of 0.01 feet to aid in the determination of groundwater flow direction and assessment of groundwater contaminant movement and distribution.

5.3 Groundwater Monitoring Program

Groundwater monitoring will be performed to evaluate groundwater flow and the presence of PFAS impacted groundwater. The monitoring well sampling locations, frequency, sampling procedures, and laboratory analyses are described in the following sections.

5.3.1 Sampling Locations and Frequency

Groundwater samples collected from the five new monitoring wells (Figure 3) during the initial sampling event will be analyzed for PFAS (WI-33 Compound List) using 537M. Based on the results of the initial sampling event, the need for additional sampling will be evaluated. If warranted, groundwater sampling may be performed on a quarterly basis to evaluate temporal and/or seasonal groundwater trends.

5.3.2 Groundwater Elevation

Groundwater elevations and depth to well bottom measurements will be collected using an electronic water level sensor (accuracy 0.01 feet) or similar equipment and recorded in a bound field notebook. Measurements will be documented at the beginning of the groundwater monitoring event and used to develop a groundwater potentiometric surface map of the shallow groundwater at the Site. The resulting groundwater elevation contours will be used to evaluate hydraulic gradients across the Site and to assist with the determination of groundwater flow.

5.3.3 Sampling Procedures

The monitoring wells will be sampled using low-flow groundwater sampling techniques, which involve utilizing a peristaltic pump with PFAS-free disposable high-density polyethylene (HDPE) tubing. New disposable HDPE tubing will be utilized for sample collection at each well location. A new pair of powder-free nitrile gloves will be used during the collection of each sample to minimize the potential for cross-contamination. Non-disposable groundwater sampling equipment will be thoroughly decontaminated between each sampling location using an Alconox[®] solution and rinsed in laboratory supplied PFAS-free, deionized water. Field measurements of temperature, pH, conductivity, dissolved oxygen (DO), and oxygen reducing potential (ORP) will be collected prior to collection of the sample.

The groundwater samples will be placed directly into laboratory-supplied containers, which will be sealed, labeled, and placed on ice pending delivery under chain-of-custody procedures to a Wisconsin certified laboratory, for analysis. One duplicate groundwater sample will be collected for every ten samples, one PFAS field blank per sampling day, and one trip blank per sample cooler will be included in the shipping container and will be analyzed for PFAS. One PFAS matrix spike/matrix spike duplicate groundwater sample will be collected from one well at the Site during each sampling event.

Groundwater samples will be analyzed for PFAS (State of Wisconsin list of 33 analytes) using Modified USEPA Method 537 (537M). The groundwater samples will be submitted to Eurofins TestAmerica (Eurofins), a Wisconsin certified laboratory located in West Sacramento, California.

5.4 Stilling Well and Pressure Transducer Installation

Based on the results of the initial groundwater sampling event and to better understand site-wide hydrogeologic flow direction in proximity to the West Twin River, a stilling well and pressure transducer network may be installed to accurately measure the surface water elevation and the groundwater table elevation.

If PFAS impacts are confirmed, it is anticipated that one stilling well will be installed along the West Twin River sheet pile wall concurrent with monitoring well installation activities. The stilling well will be used to measure the surface water elevation of the West Twin River. The stilling well will be constructed of an appropriate length of 2-inch diameter, schedule 40 PVC riser pipe inserted into the West Twin River and secured to the metal sheet pile wall. Surface water elevations will be collected using an electronic water level sensor (accuracy 0.01 feet) or similar equipment and recorded in a bound field notebook. Measurements will be documented at the beginning of the groundwater monitoring event and used to assist with the evaluation of groundwater flow.

After developing each monitoring well in accordance with WAC NR 141 (and the installation of the stilling well), a pressure transducer (with an accuracy of 0.01-foot) will be installed in each monitoring well and in the stilling well. Water level measurements will be collected at a minimum of once per day and used to evaluate the interaction of the groundwater with the West Twin River.

5.5 IDW Management

Soil cuttings, purge water, and/or decontamination water generated during site activities will be containerized in individual 55-gallon drums and labeled. The drums will be staged on site at an approved, accessible location designated by the property owner. Representative waste characterization samples will be collected from the drums and submitted to a Wisconsin-certified laboratory, for Protocol B analyses, including PFAS analysis.

Waste profile(s) will be completed and submitted to a waste disposal company for transportation and disposal at a licensed waste facility. Waste disposal documentation will be provided in the Focused SIR.

5.6 Reporting

Following substantial completion of the focused site investigation activities, a Focused SIR will be prepared. The Focused SIR will include the following site information:

- summary of the Ramboll additional activities at the Site which will include field measurements, summary of geologic and hydrogeologic characteristics, observations, and discussion of the analytical results, and figures and tables to illustrate the results of the investigations at the Site; and
- conclusions and recommendations for further investigation.

In accordance with WAC NR 716.14, Ramboll will prepare brief notification letters with sampling results to the WDNR and WRL within 15 business days of receiving the laboratory analytical reports. Ramboll is requesting an extension for the distribution of the notification letters from 10 business days

to 15 business days due to the time required to complete a quality assurance/quality control review of the PFAS data.

6. IMPLEMENTATION SCHEDULE

A preliminary schedule for the Work Plan is provided below. Please note, subcontractor availability may cause the schedule to be modified.

Task	Schedule
Prepare Site Health and Safety Plan	February/March 2024
Secure Site Access	February 2024
Utility Assessment and Clearance	March 2024
Soil Boring/Monitoring Well Installation	Within 5 weeks of WDNR approval of this Work Plan (pending subcontractor availability after WDNR approval)
Monitoring Well Development	Approximately 1 week after monitoring well installation
Initial Groundwater PFAS Sampling	Approximately 1 week after monitoring well development
Stilling Well and Transducer Installation (if needed)	To Be Determined
Additional PFAS Groundwater Sampling Events (if needed)	To Be Determined
Focused NR 716 Site Investigation Report	60 days after substantial completion of the PFAS Focused Site Investigation

Please note that the above schedule assumes that weather and site conditions are suitable for effective performance of the field investigation activities. Significant weather-related concerns (e.g., extreme temperatures, flooding, or snow cover) may delay implementation. Ramboll will keep the WDNR project manager apprised of any delays that are outside of Ramboll and NOC’s control.

7. REFERENCES

Fehr Graham. 2021. *Phase I Environmental Site Assessment*. November 17.

Fehr Graham. 2022a. *Historical Use and Ownership Assessment to Determine Potentially Responsible Parties*. March 11.

Fehr Graham. 2022b. *Site Investigation Work Plan*. June 22.

Fehr Graham. 2023a. *Materials Management Plan & Chapter NR 718 Exemption Request*. June 5.

Fehr Graham. 2023b. *Sub-Slab Vapor Mitigation Design*. June 5.

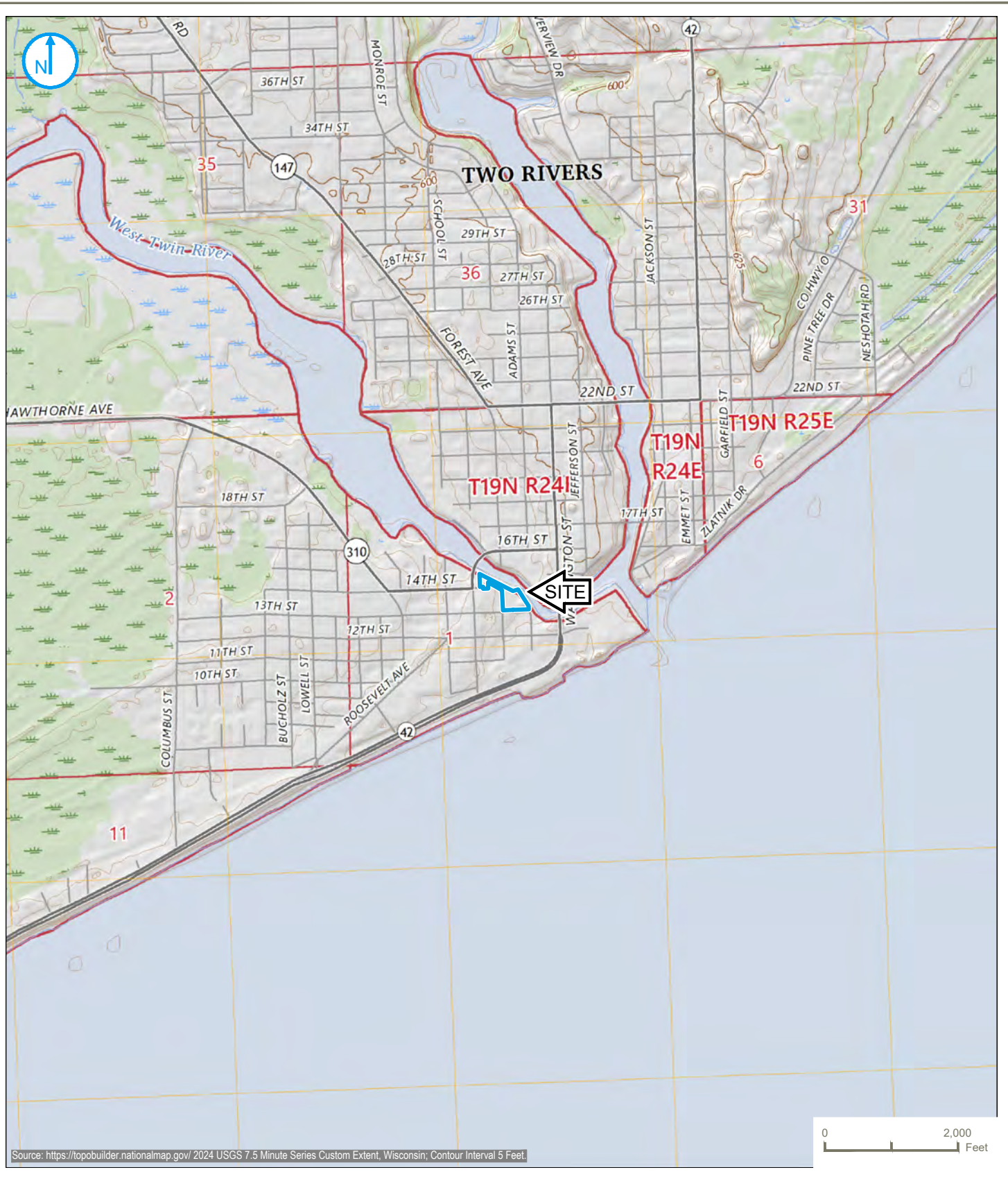
Fehr Graham. 2023c. *Addendum to Materials Management Plan and Chapter NR 718 Exemption Request*. June 20.

Stantec. 2022. *Site-Specific Sampling and Analysis Plan*. September 2022.

Stantec. 2023. *Site Investigation Addendum*. July 11.

WDNR. 2022. *Reported Contamination at Bright Horizon Properties LLC (Former) – Responsibilities of Newell Operating Co*. March 25.

FIGURES



Map Scale: 1:24,000 | Map Center: 44.1460, -87.5715

SITE LOCATION

FIGURE 01

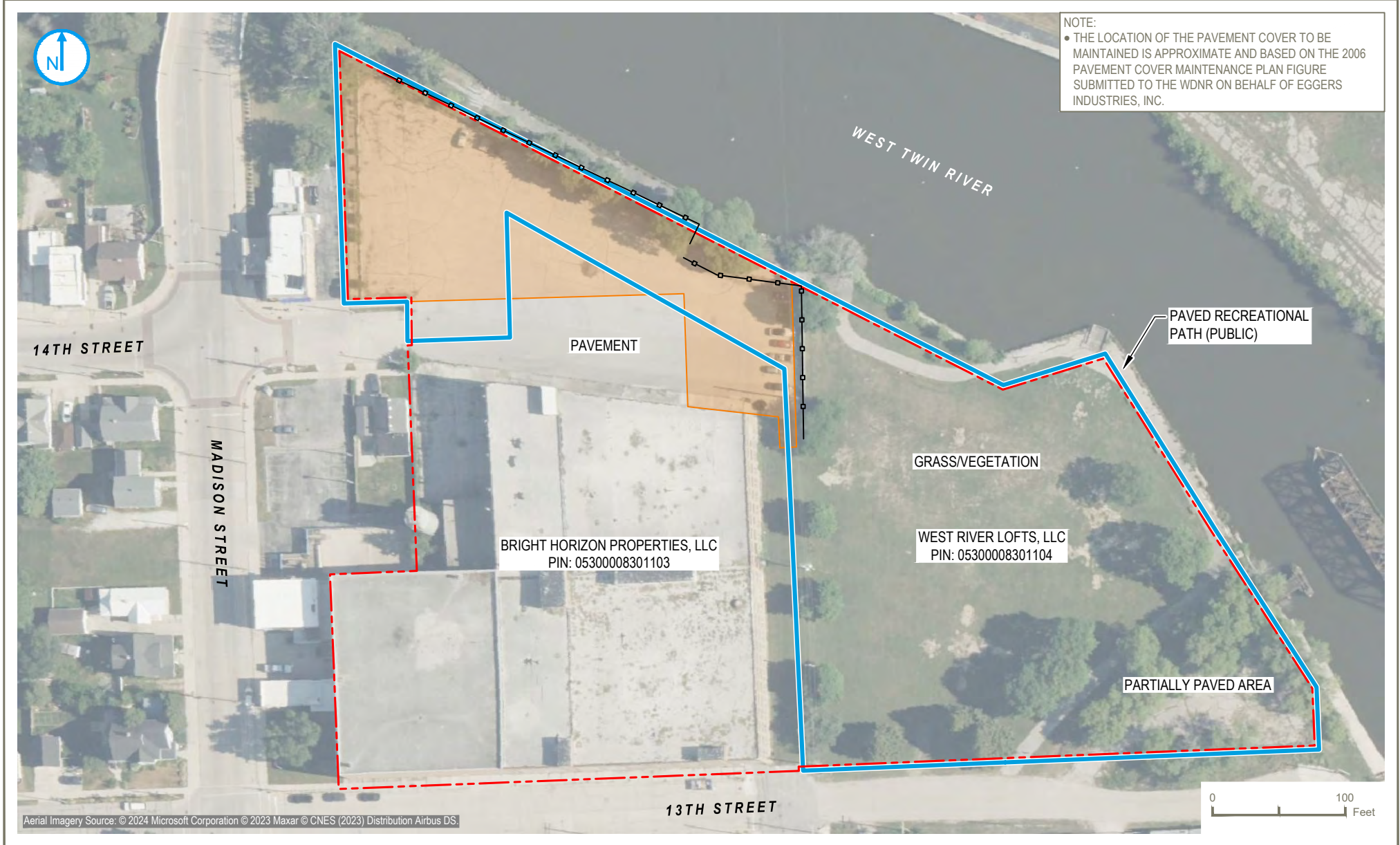


KEY MAP

WEST RIVER LOFTS, LLC
(FORMER MIRRO PLANT NO. 4)
 1621 14TH STREET
 TWO RIVERS, WISCONSIN

RAMBOLL AMERICAS
 ENGINEERING SOLUTIONS, INC.
 A RAMBOLL COMPANY





- PROPERTY BOUNDARY (APPROXIMATE)
- - - HISTORICAL PROPERTY BOUNDARY (APPROXIMATE)
- EXISTING WOOD FENCE (APPROXIMATE)
- HISTORICAL ENVIRONMENTAL CONTINUING OBLIGATIONS: PAVEMENT COVER TO BE MAINTAINED (APPROXIMATE)

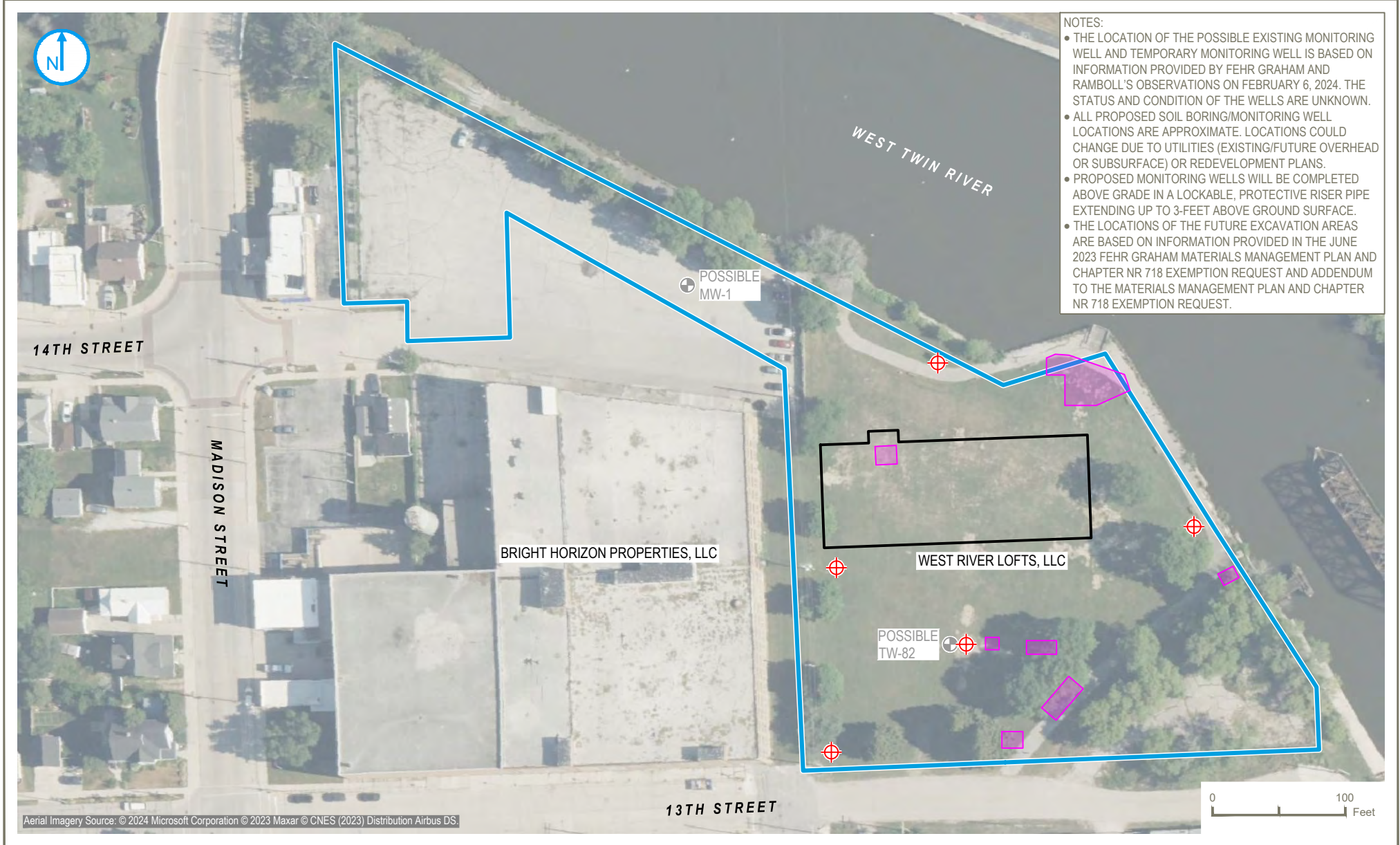
SITE LAYOUT

**WEST RIVER LOFTS, LLC
(FORMER MIRRO PLANT NO. 4)**
1621 14TH STREET
TWO RIVERS, WISCONSIN

FIGURE 02

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY





Aerial Imagery Source: © 2024 Microsoft Corporation © 2023 Maxar © CNES (2023) Distribution Airbus DS.

APPENDIX A

HISTORICAL SANBORN INSURANCE MAPS

PFAS Focused NR 716 Site Investigation
Work Plan - Appendix A:

As provided as an Appendix to the:
Phase I Environmental Site Assessment
(Fehr Graham, November 17, 2021)

Scott Crawford
1702 13th Street
Two Rivers, WI 54241

Inquiry Number: 6734838.3

November 05, 2021

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

11/05/21

Site Name:

Scott Crawford
1702 13th Street
Two Rivers, WI 54241
EDR Inquiry # 6734838.3

Client Name:

Fehr-Graham & Associates
909 North A Street, Suite 101
Sheboygan, WI 53081
Contact: Carson Kaiser



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Fehr-Graham & Associates were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Certification # E959-4F8A-B0F7

PO # 21-1036

Project Scott Crawford

Maps Provided:

1967	1885
1944	
1929	
1922	
1913	
1904	
1898	
1891	



Sanborn® Library search results

Certification #: E959-4F8A-B0F7

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

The Sanborn Library LLC Since 1866™

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Sanborn Sheet Key

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



1967 Source Sheets



Volume 1, Sheet 4
1967



Volume 1, Sheet 6
1967

1944 Source Sheets



Volume 1, Sheet 4
1944



Volume 1, Sheet 6
1944

1929 Source Sheets



Volume 1, Sheet 4
1929



Volume 1, Sheet 6
1929

1922 Source Sheets



Volume 1, Sheet 8
1922



Volume 1, Sheet 10
1922

Sanborn Sheet Key

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



1913 Source Sheets



Volume 1, Sheet 7
1913



Volume 1, Sheet 9
1913

1904 Source Sheets



Volume 1, Sheet 4
1904



Volume 1, Sheet 5
1904

1898 Source Sheets

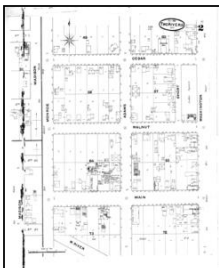


Volume 1, Sheet 4
1898



Volume 1, Sheet 5
1898

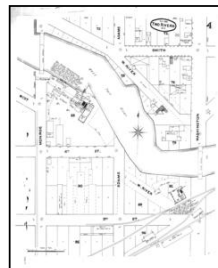
1891 Source Sheets



Volume 1, Sheet 2
1891



Volume 1, Sheet 3
1891



Volume 1, Sheet 4
1891

Sanborn Sheet Key

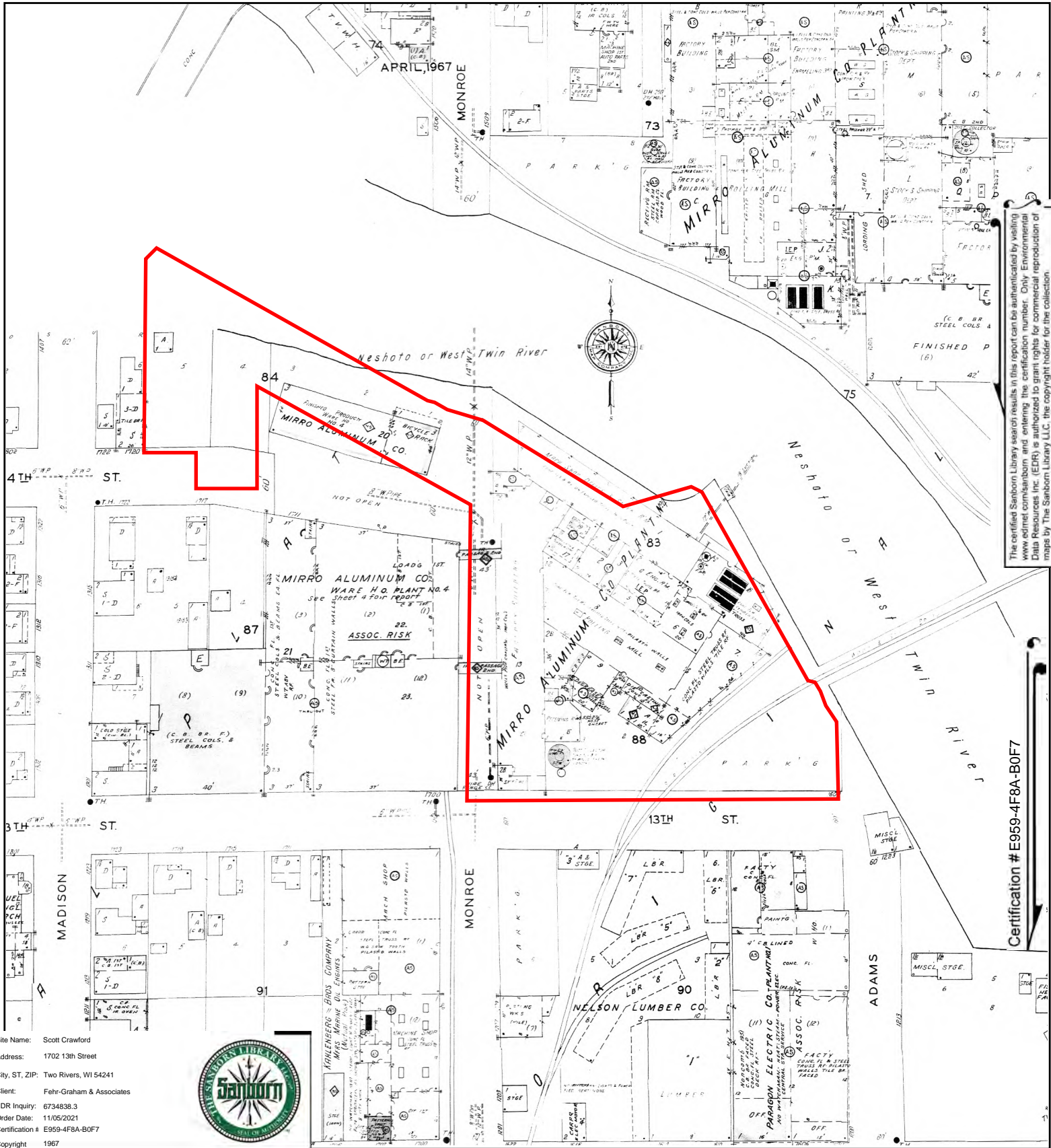
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1885 Source Sheets



Volume 1, Sheet 1
1885



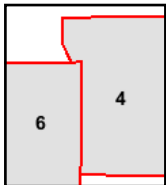
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 Copyright 1967

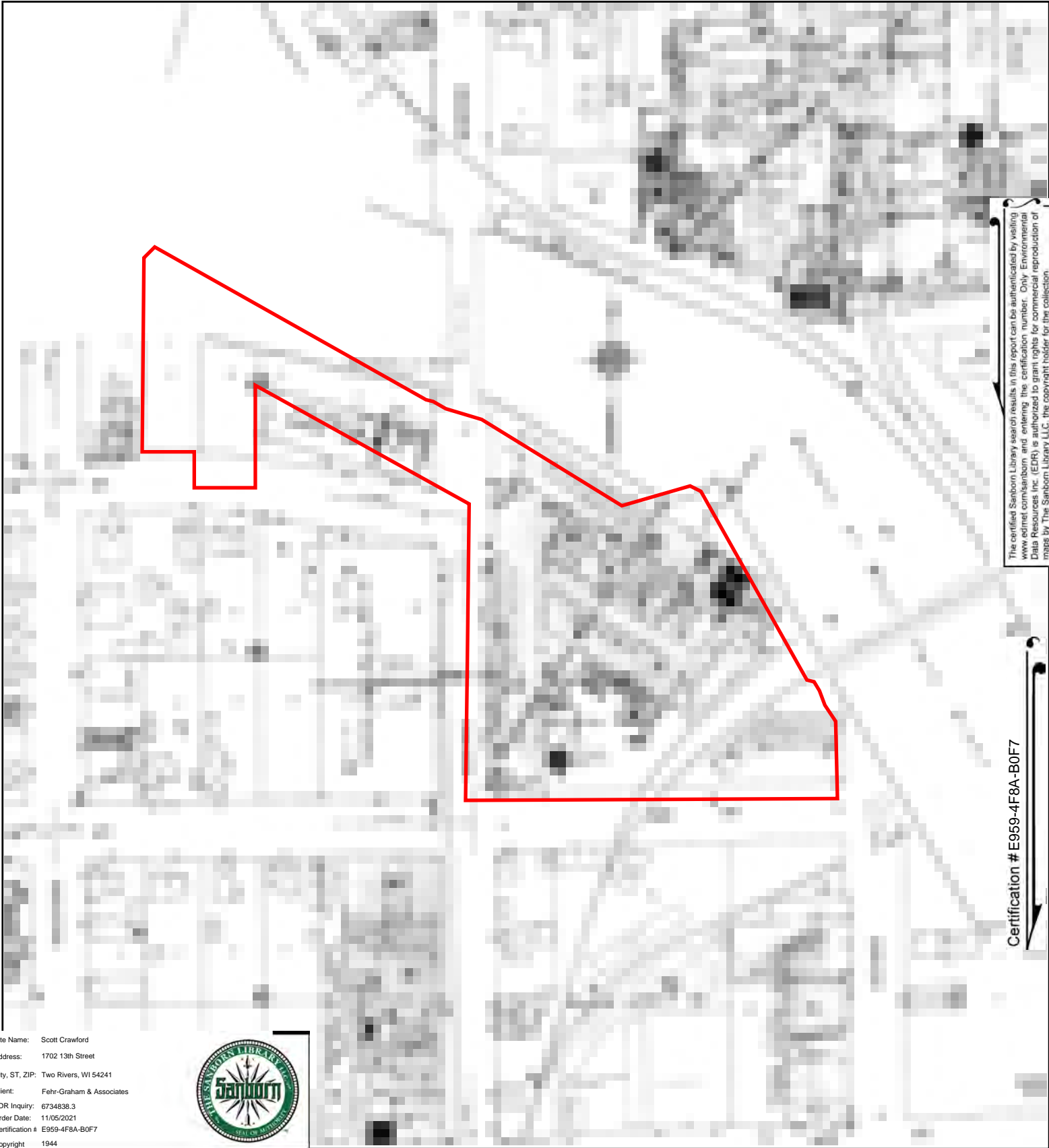


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Volume 1, Sheet 6
 Volume 1, Sheet 4





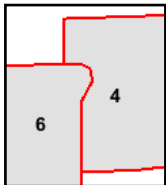
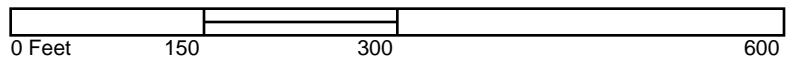
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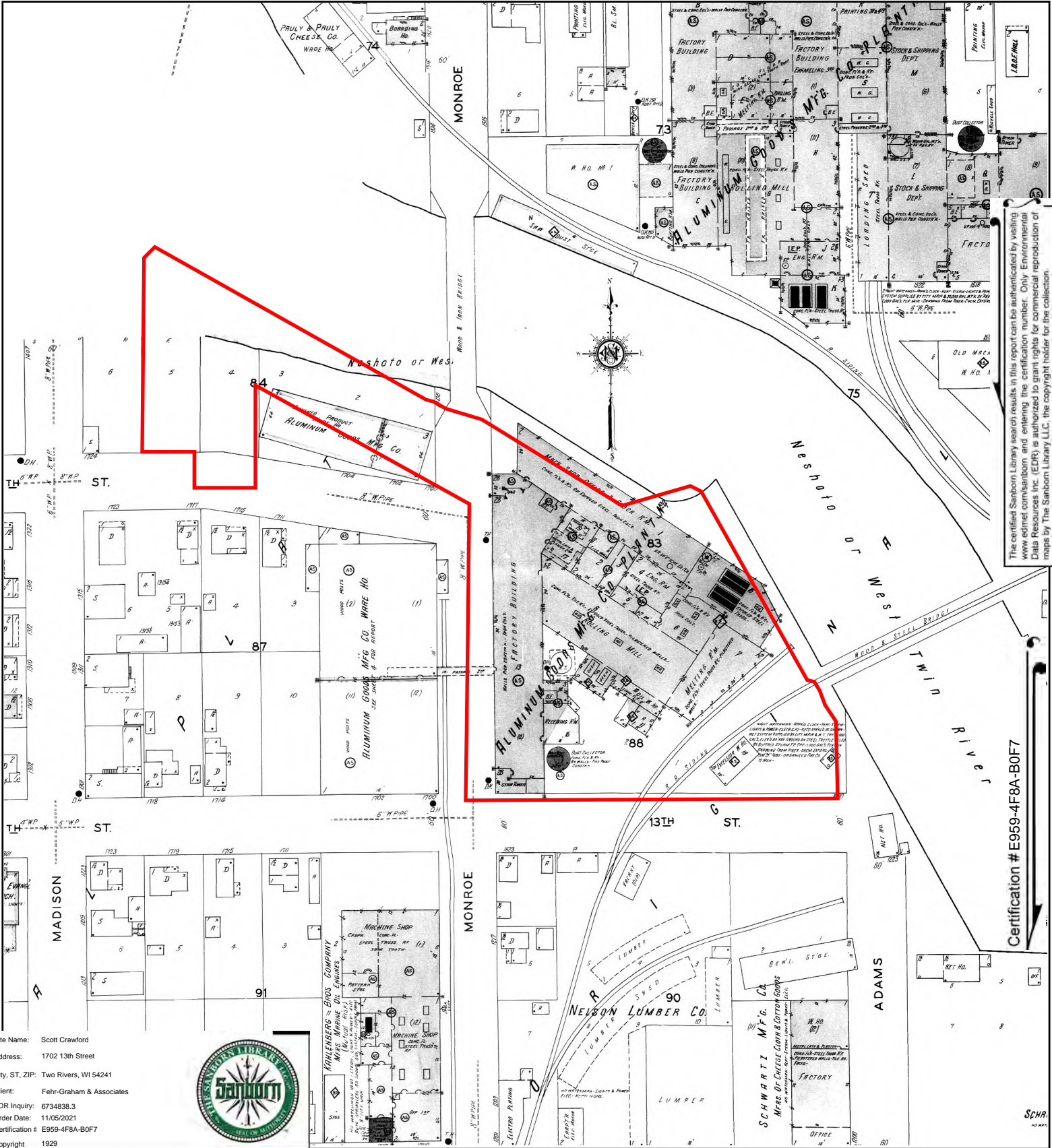


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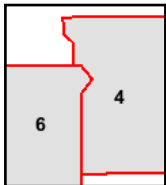
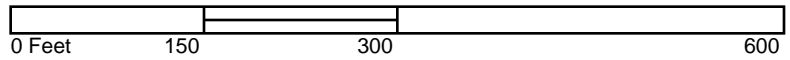
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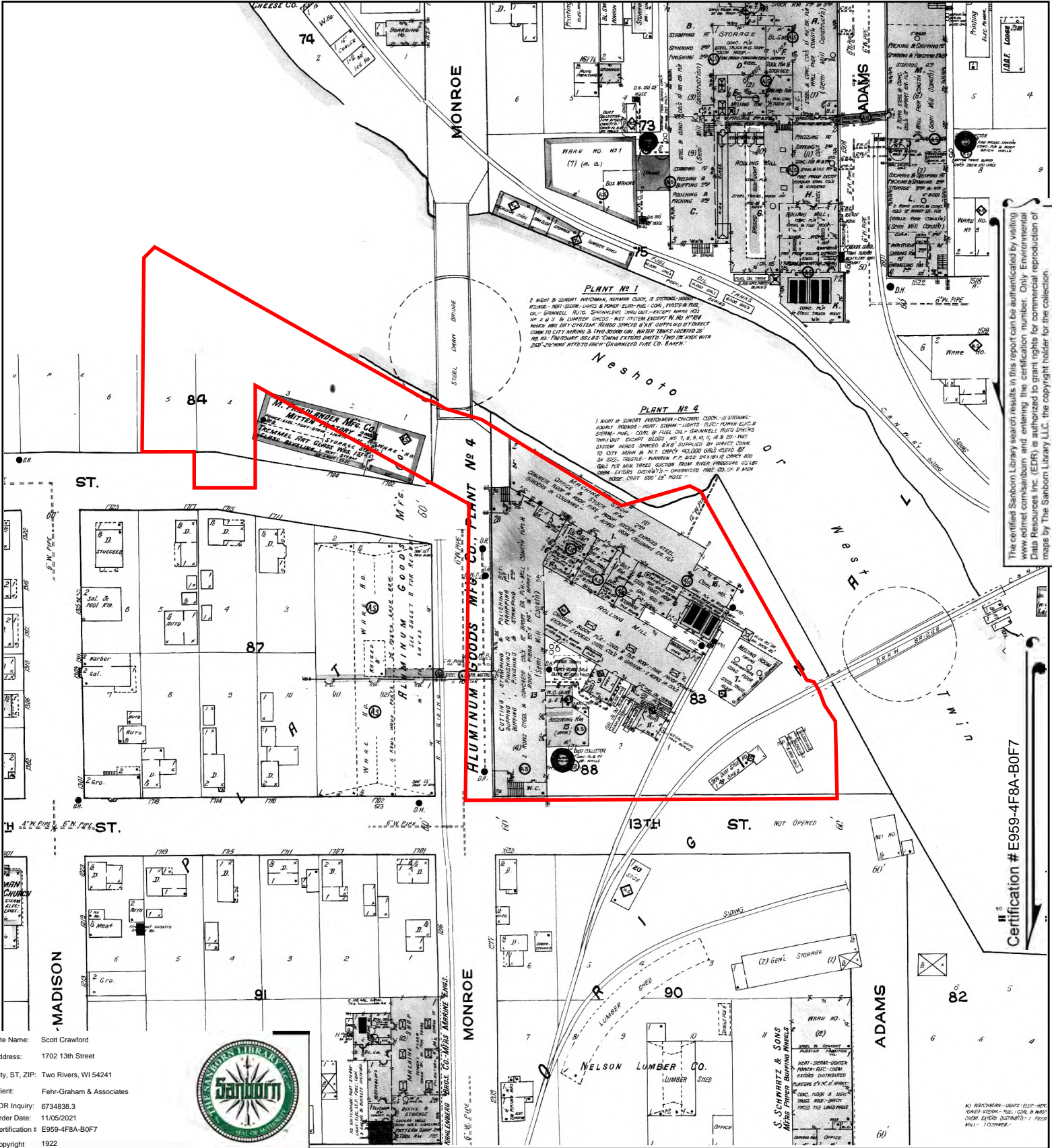


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Volume 1, Sheet 6
 Volume 1, Sheet 4





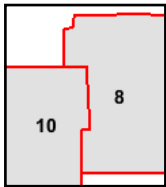
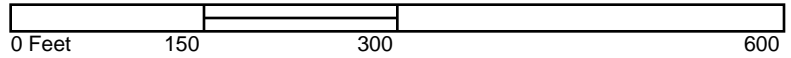
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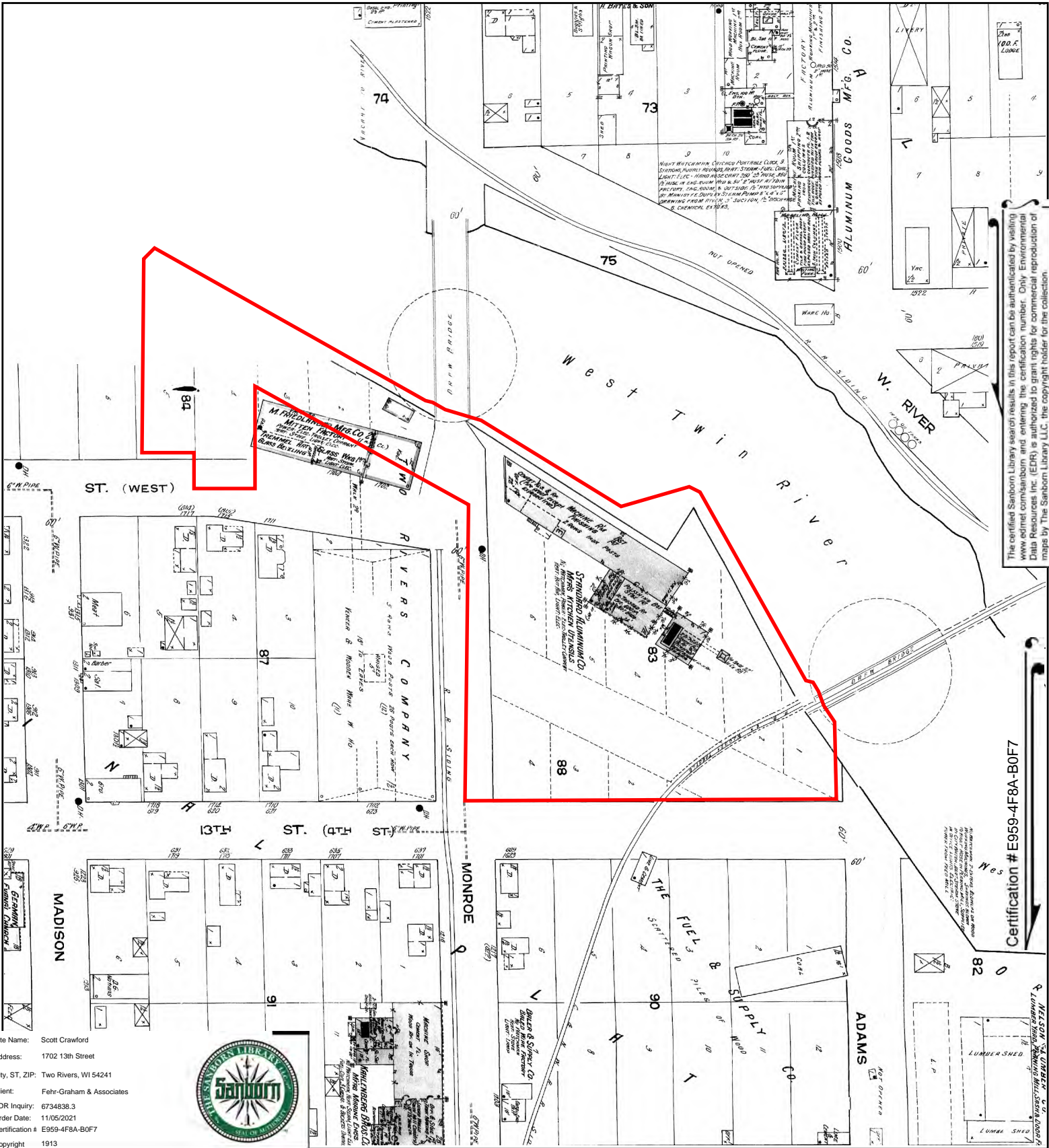


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Volume 1, Sheet 10
 Volume 1, Sheet 8





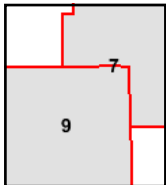
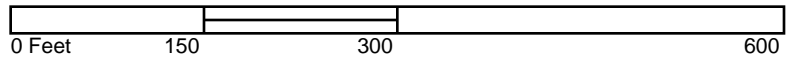
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 Copyright 1913

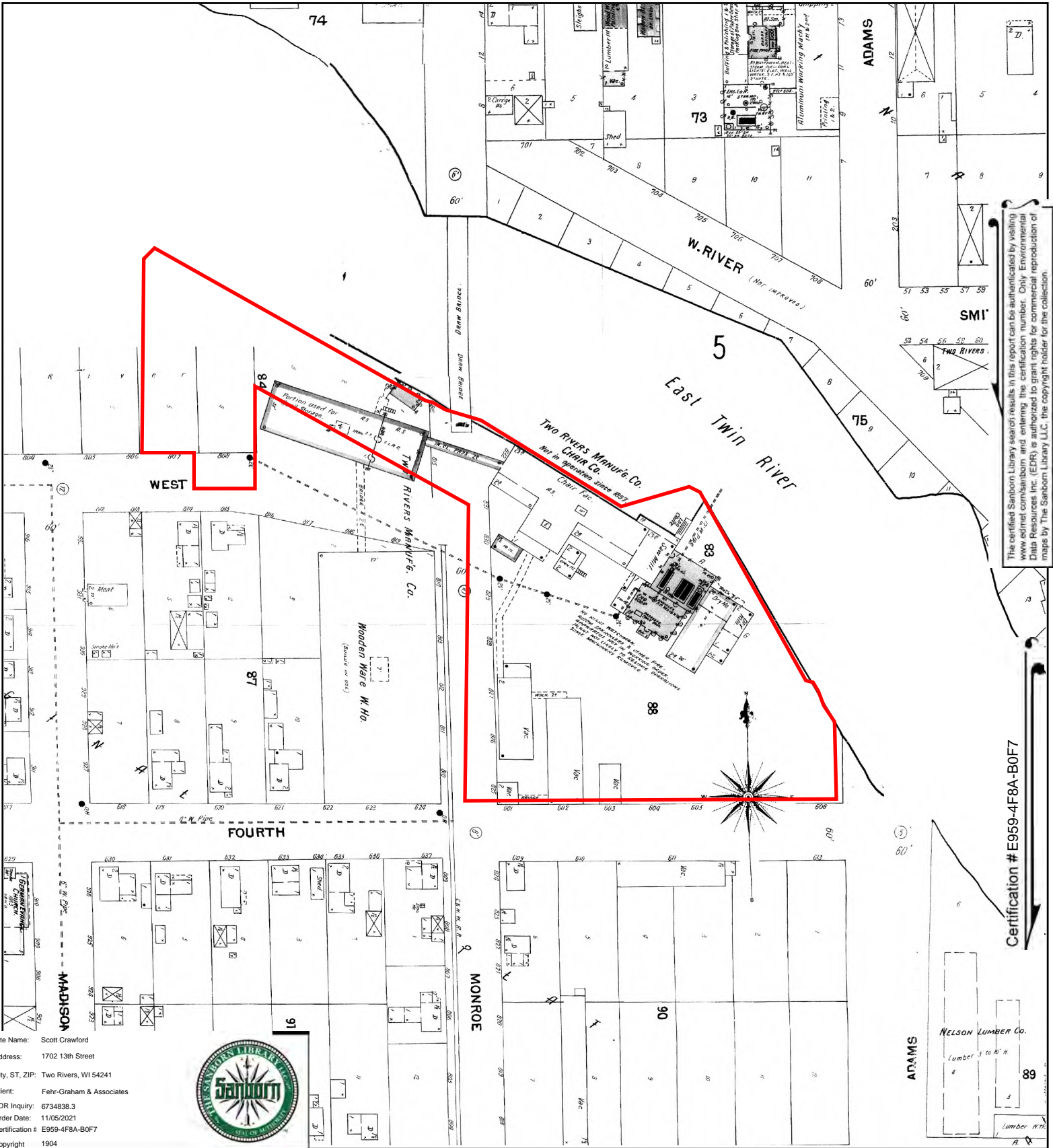


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Volume 1, Sheet 9
 Volume 1, Sheet 7





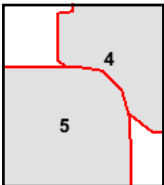
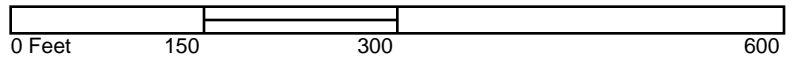
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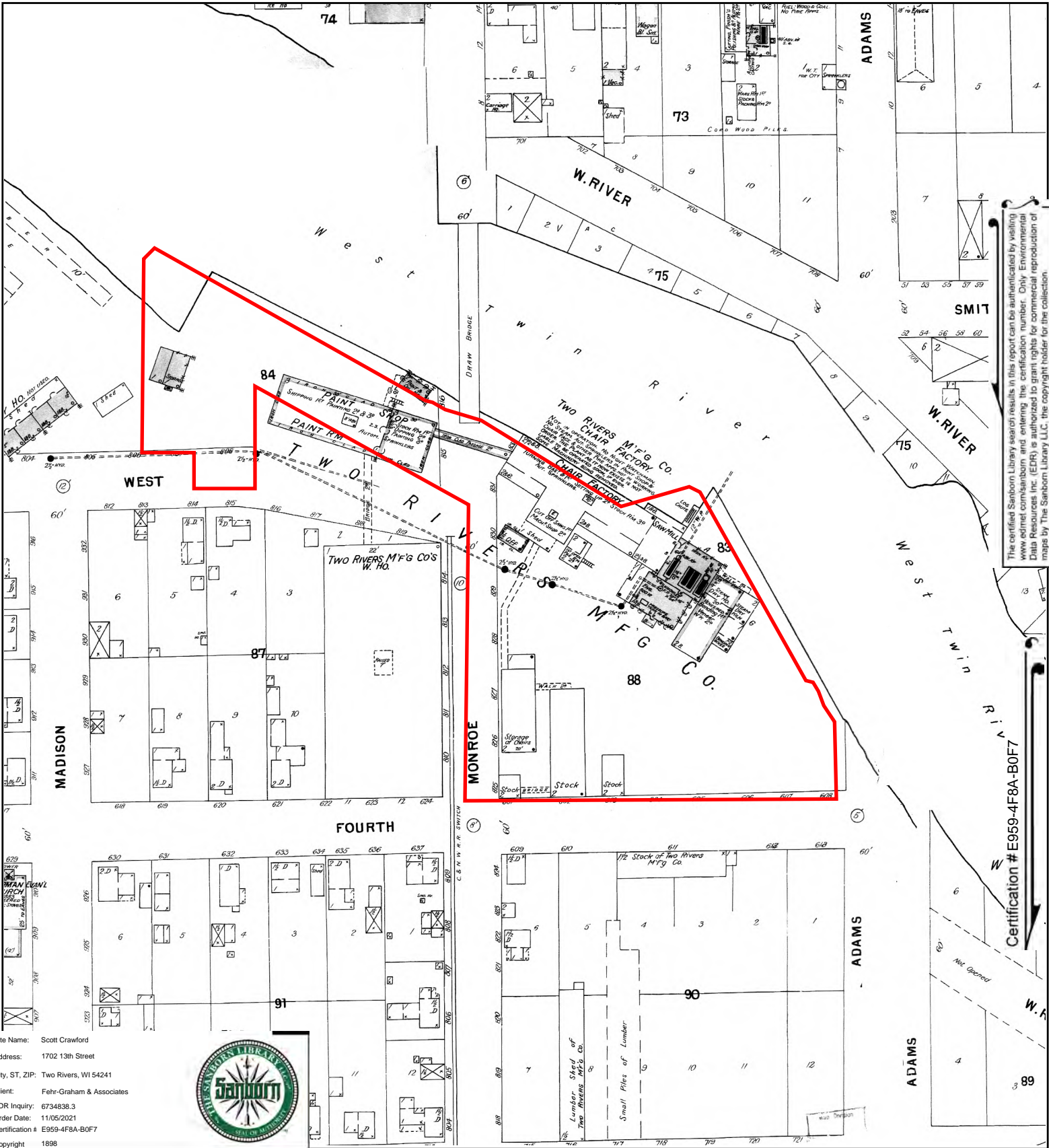


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Volume 1, Sheet 5
 Volume 1, Sheet 4





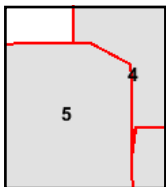
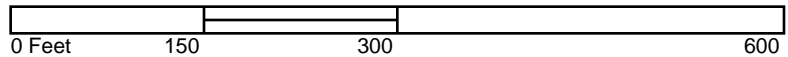
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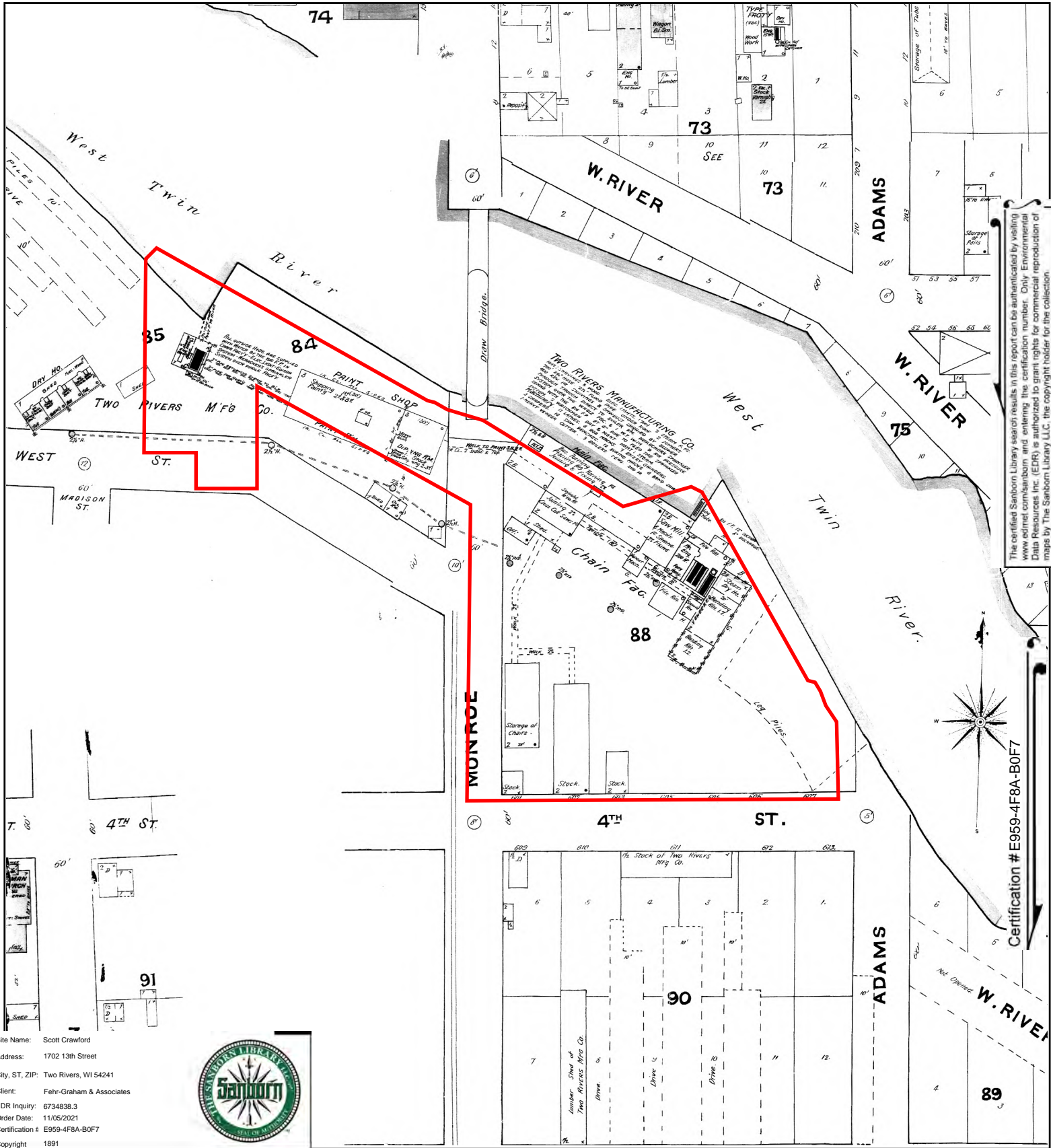


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Volume 1, Sheet 5
 Volume 1, Sheet 4





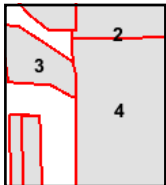
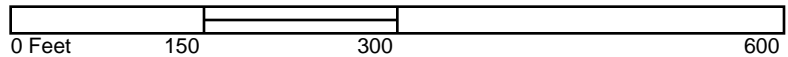
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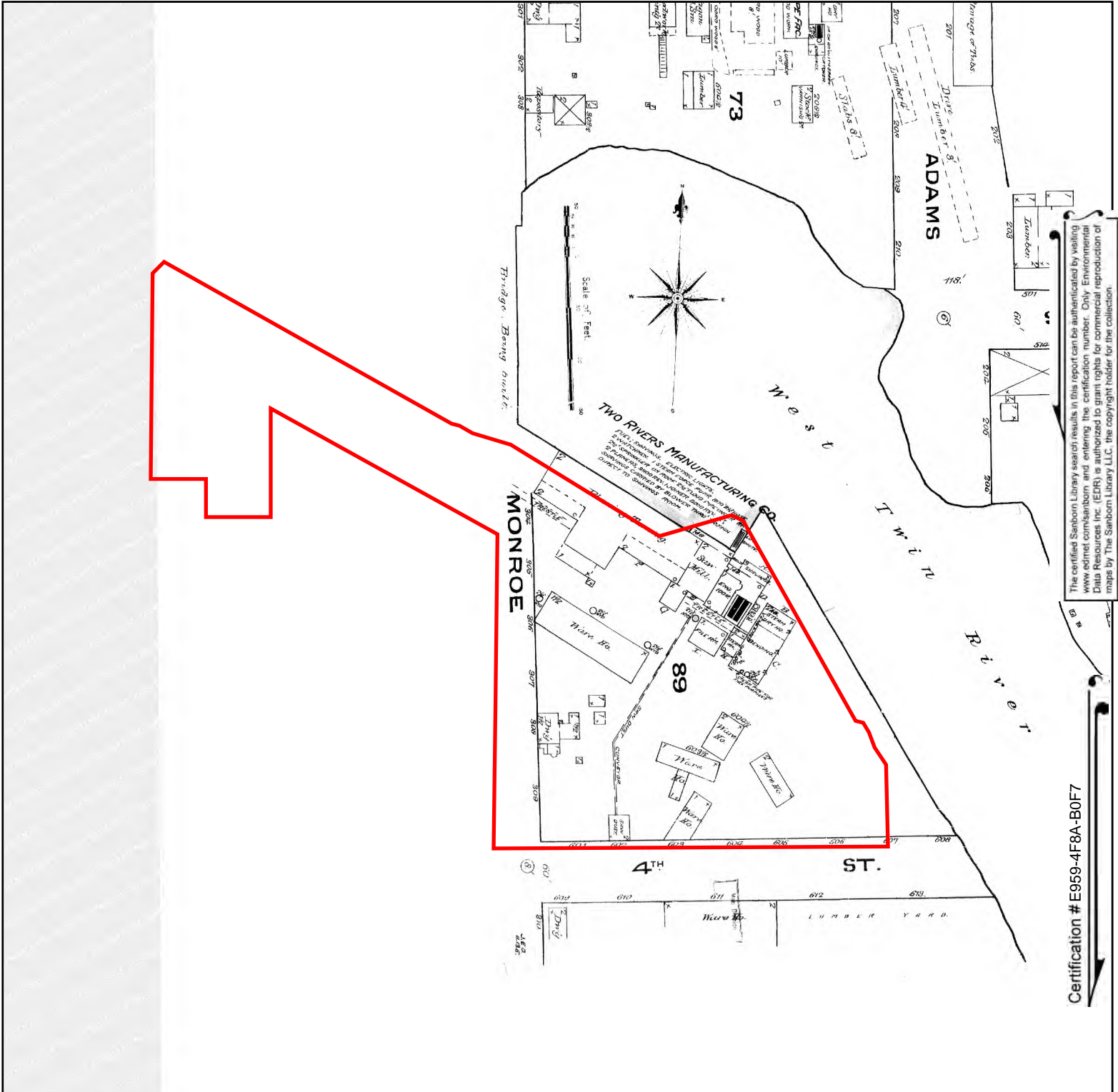


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Volume 1, Sheet 4
 Volume 1, Sheet 3
 Volume 1, Sheet 2





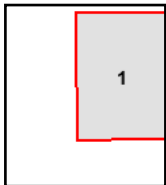
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Volume 1, Sheet 1

