

**From:** Beggs, Tauren R - DNR  
**Sent:** Friday, March 8, 2024 7:49 AM  
**To:** Kristin Holloway Jones (kristin.jones@newellco.com)  
**Cc:** Jeanne Tarvin; Sawula, Andrew N.; Que El-Amin  
**Subject:** Review of Site Investigation Work Plan Letter for Bright Horizon Properties LLC (Former), BRRTS # 02-36-589295  
**Attachments:** 20240308\_36\_SIWP\_Appr.pdf

Good morning Kristin,

Attached is the Review of Site Investigation Work Plan Letter for the above referenced site.

If you have any questions, please let me know.

Regards,  
Tauren

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



March 8, 2024

Newell Operating Company  
Attn: Kristin Jones  
6655 Peachtree Dunwoody Road  
Atlanta, GA 30328  
Via Electronic Mail Only to [Kristin.Jones@newellco.com](mailto:Kristin.Jones@newellco.com)

Subject: Review of Site Investigation Work Plan  
Bright Horizon Properties LLC (Former), 1621 14<sup>th</sup> Street (Formerly 1702 13<sup>th</sup> Street), Two Rivers, WI  
BRRTS #: 02-36-589295, FID #: 436010300

Dear Ms. Jones:

On February 27, 2024, the Wisconsin Department of Natural Resources (DNR) received the *PFAS Focused NR 716 Site Investigation Work Plan (SIWP)* prepared for Newell Operating Company (NOC) by Ramboll Americas Engineering Solutions, Inc. (Ramboll). The SIWP was submitted with a fee for DNR review and response. The submittal of a SIWP is required per Wisconsin Administrative (Wis. Admin.) Code § NR 716.09, as this site is subject to regulation under Wisconsin Statute (Wis. Stat.) § 292. The DNR reviewed the SIWP for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

### SIWP Summary

To confirm the initial per- and polyfluoroalkyl substances (PFAS) detections at the site and evaluate the extent of impacts, the following work is proposed (refer to *Figure 03, Proposed Soil Boring and Monitoring Well Locations*, dated 2/19/2024):

- Five proposed sampling locations for soil within the direct contact interval and groundwater for analysis of PFAS (State of Wisconsin list of 33 analytes). The need for additional groundwater sampling will be evaluated after the initial sampling event.
- Surveying and elevation measurements to understand site hydrogeology (depth to groundwater, groundwater flow direction, etc.).
- Based on the results of initial groundwater sampling event and to better understand site-wide hydrogeologic flow direction in proximity to the West Twin River, a stilling well and transducer network may be installed to accurately measure the surface water elevation and the groundwater table elevation.
- Results of the PFAS investigation will be submitted in a Focused Site Investigation Report to DNR after receipt of laboratory analysis and data evaluation.

### DNR Review of the SIWP

Following review of the SIWP, the DNR concurs that you can proceed with the proposed work. If any of the monitoring wells are still present from previous investigation work done at the site, it may be beneficial to sample those for PFAS as well. Any remaining temporary monitoring wells can be abandoned, if no longer needed.

The site investigation can be an iterative process. Site investigation activities may indicate that further investigation is needed to define the degree and extent of contamination under Wis. Admin. Code ch. NR 716.

### Schedule

The submitted SIWP indicates the proposed investigation field work will be completed in March/April 2024, so the field investigation will be initiated within 60 days after DNR approval, as required per Wis. Admin. Code § NR 716.11(2r). Results of the site investigation activities are planned to be submitted in a focused site investigation report 60 days after substantial completion of the PFAS focused site investigation.

The DNR concurs with the requested change from 10 to 15 days for notification of sampling results due to the time required to complete a quality assurance/quality control review of the PFAS data.

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

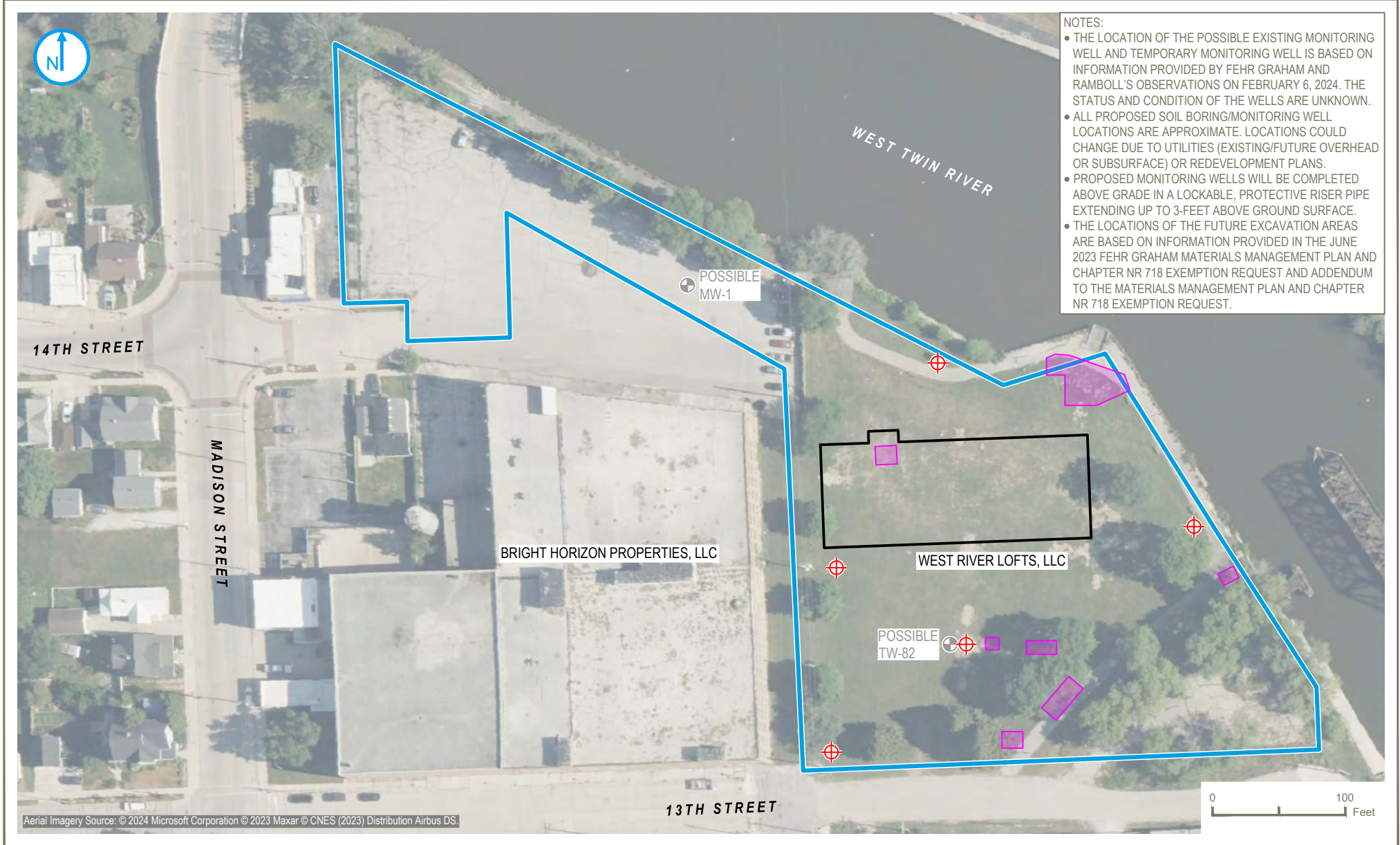
Sincerely,



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

Attachment: Figure 03, Proposed Soil Boring and Monitoring Well Locations, dated 2/19/2024

cc: Jeanne Tarvin, Ramboll ([jtarkin@ramboll.com](mailto:jtarkin@ramboll.com))  
Andrew Sawula, ArentFox Schiff ([Andrew.sawula@afslaw.com](mailto:Andrew.sawula@afslaw.com))  
Que El-Amin, West River Lofts, LLC ([que@scott-crawford.com](mailto:que@scott-crawford.com))



## PROPOSED SOIL BORING AND MONITORING WELL LOCATIONS

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

**FIGURE 03**

RAMBOLL AMERICAS  
ENGINEERING SOLUTIONS, INC.  
A RAMBOLL COMPANY

