



June 9, 2016

Mr. Gerry Neuser
Dept. of Public Works Director
Manitowoc County
1028 South 9th Street
Manitowoc, WI 54220

SUBJECT: Site Investigation Report Not Approved,
Lesperance Property (Former)(LGU) and White Property (LGU),
2022 School Street and 1910 20th Street, Two Rivers, Wisconsin
BRRTS #: 02-36-560273 and 02-36-096500

Dear Mr. Neuser,

Purpose

The purpose of this letter is to provide a response to the *NR 716 Investigation Report*, dated July 2015, with review fee submitted on your behalf by Ayres Associates (Ayres) that was received by the Department of Natural Resources (the Department) on September 11, 2015. The *Phase II Environmental Assessment Activities Report*, dated March 2013, submitted by Sigma Group to the Department and historic investigation documentation from the 1990s for the EPA removal action and the Department site assessment at the White Property (LGU) site was also evaluated to determine if the site investigations for the Lesperance Property (Former)(LGU) and White Property (LGU) cases are complete. Per the October 20, 2015 meeting with Manitowoc County (County), the Department and the County agreed to delay the site investigation review until the County determined whether or not they would like to apply for the Voluntary Party Liability Exemption (VPLE). On April 19, 2016, through email correspondence with Ayres, the Department was notified that the County decided not to apply for VPLE, so the Department proceeded with review of the site investigation report. The fee for review of the site investigation report was re-issued by Ayres and received by the Department on June 6, 2016.

Additional Actions

The site investigations for these two environmental repair (ERP) cases have been conducted concurrently throughout the Wis. Admin. ch. NR 700 rule series cleanup process. Based on the review, the Department has determined that the site investigation is not complete. Please submit a work plan to the Department for the following items that need to be addressed in order to complete the investigation. Please refer to the attached figures for reference to sample locations.

- A monitoring well needs to be installed in the source area near soil sample locations HA-17 and AGP-3 to determine if groundwater is impacted by volatile organic compounds (VOCs) or polycyclic aromatic hydrocarbons (PAHs) in the vicinity of the former aboveground storage tanks (ASTs) on the Lesperance property.
- PAHs and metals have been detected above direct contact soil standards in documented soil fill on the western portion of the Lesperance property and across the entire White property. There is limited soil sampling on the east half of the Lesperance property within the direct contact zone (0-4 feet below ground) in the soil fill documented on-site. The Department will assume that PAHs and metals are in the

documented soil fill across the entire Lesperance property, unless additional soil samples are collected to prove otherwise.

- The Department concurs with the site investigation report recommendation that additional soil delineation is needed for polychlorinated biphenyls (PCBs) around soil sample location AGP-7 on the White property.
- PCBs were detected in soil above the groundwater pathway residual contaminant level (RCL) in AGP-7 on the White property; therefore, a monitoring well needs to be installed at the AGP-7 location to determine if PCBs are impacting groundwater.
- Soil samples need to be collected along the White property boundary adjacent to historic off-site soil samples S-13 and S-15, which were collected after the EPA removal action as part of the Department site assessment, to confirm if there are soil standard exceedances for PAHs, arsenic, and/or mercury. The Department plans to work with your consultant and provide funding for collection and analysis of these samples.
- Monitoring wells installed on the Lesperance and White properties in 2015 need to be resampled.
- There was historic sediment data collected adjacent to the Lesperance and White properties. An additional large scale sediment investigation is being conducted in the area in the near future. Sediment sampling is not necessary at this time; however, pending further evaluation of future sediment data that will be submitted to the Department, additional sediment investigation may be warranted.

Depending on the results of the additional site investigation, additional environmental work may be required. The Department appreciates the County's environmental work conducted to date as an exempt local government unit to progress these properties through the cleanup process and towards an end goal of redevelopment. Please feel free to contact me at (920) 662-5178 or at Tauren.Beggs@wisconsin.gov if you have any questions in regard to this letter.

Sincerely,

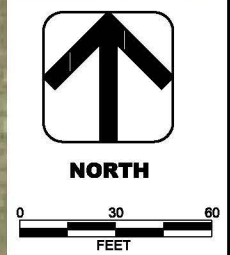


Tauren R. Beggs
Hydrogeologist – Northeast Region
Remediation & Redevelopment Program

Attachments:

- Site Map, April 2015
- Site Assessment Sample Location Map, January 1995

cc: Lynn Scherbert, Ayres Associates (electronic)



LEGEND

- AGP-11 SOIL PROBE
- ⊕ AMW-2 WATER TABLE OBSERVATION WELL
- APZ-1 PIEZOMETER
- ▲ VP-1 VAPOR PROBE
- × SURFACE WATER SPOT ELEVATION
- ⊕ GP-8 WDNR SOIL BORING LOCATIONS - 1999
- ▲ S-14 EPA SOIL SAMPLE LOCATIONS - 1999
- MW-612 WPS MONITORING WELLS
- ⊕ SGP-24 SIGMA SOIL BORINGS - 2012
- (T-16) HISTORIC TANKS - REMOVED
- G NATURAL GAS LINE
- G--- HISTORIC U.S. OIL PIPELINE

NOTE: THIS DRAWING WAS PREPARED IN COLOR. REPRODUCTION BY MEANS OTHER THAN EQUIVALENT COLOR COPYING MAY CAUSE SOME DATA TO BE LOST OR MISREPRESENTED.

GOOGLE EARTH PRO IMAGERY DATED 5/14/13

7/10/2015
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DR BY	T. SHUPERT	BOOK NO.	
CHK BY	J. STEINER	JOB NO.	19-0558.00
DATE	APRIL 2015	SCALE	AS SHOWN
NO.		DATE	
REVISION		NO.	
REVISION		DATE	

1910 20TH STREET & 2022 SCHOOL STREET
TWO RIVERS, WISCONSIN



SITE MAP	DRAWING NO.
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