State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Oshkosh Service Center
625 E CTY Y, Suite 700
Oshkosh WI 54901-9731

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

August 4, 2025

City of Brillion
Attn: Austen Frederickson
201 N. Main Street
Brillion WI 54110
Sent via email only to pwd@brillionwi.gov

Subject: Review of the Site Investigation Report
BIW Redevelopment Area 2A, 200 Park Ave, Brillion WI
BRRTS # 02-08-597052 FID# 408021020

Dear Mr. Frederickson:

On June 12, 2025 the Wisconsin Department of Natural Resources (DNR) received the "Site Investigation Report" (Report) prepared by Stantec. and a review fee of $1050. The submittal of a Site Investigation Report (SIR) is required per Wis. Admin. Code § NR 716.15. This Report was reviewed for compliance with Wis. Admin. Code § NR 716. This site is not in the Voluntary Party Liability Exemption program.

Review
After reviewing the Report and all case file information submitted to date, the DNR has determined that the site investigation is NOT complete per the requirements of Wis. Admin. Code § NR 716. Comments on the SIR are provide below.

Background
The Project Area consists of portions of two former industrial parcels of land and previously dedicated rights-of-way (ROW) totaling 3.9 acres within the greater 145-acre Brillion Iron Works brownfield redevelopment. The Project Area is currently unoccupied, and the former industrial buildings were razed between 2018 and 2020. To improved stormwater management, this project is one portion of the plan to "daylight" and reroute Spring Creek which will create flood storage and maximize redevelopment. Contamination at this site is related to metals and polycyclic aromatic hydrocarbon (PAH) contamination in soil and foundry sand fill observed across the site. Contaminant concentrations exceed the Wis. Admin. Code ch. NR 720 non-industrial direct contact and/or groundwater pathway residual contaminant levels.

DNR Comments and Recommendations
- DNR concurs that site has been sufficiently investigated and characterized to move forward with the proposed stream alignment project.
- The groundwater investigation is not complete for 1,1,1-TCA and 1,4 Dioxane.
- An EC Scoping Statement was not provided.
- Additional SIR comments:
  - Data from adjacent investigations should be included in SIR to degree and extent of soil and groundwater is delineated.
  - Data from the Ayres 2022 Site Investigation Work Plan (SIWP) should be included in SIR tables and Figures.
  - Cross-sections need to be included in SIR
  - Sediment investigation completed previously in 2015.

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Once the above items have been addressed an updated Site Investigation Report should be submitted to the DNR. A fee should also be included if DNR review is requested.

The DNR appreciates your efforts to restore the environment at this site. If you have questions regarding this letter, please feel free to contact me at 920-808-0170 or Kevin.McKnight@wisconsin.gov.

Sincerely,

Kevin D. McKnight
Project Manager/Hydrogeologist
Remediation and Redevelopment Program

cc: Harris Byers, Stantec (Harris.Byers@stantec.com)