

**From:** [Sager, John E - DNR](#)  
**To:** [Gregory Prom \(MP\)](#)  
**Cc:** [Saari, Christopher A - DNR](#); [Waite, Brian A - DNR](#); [Krul, Steve](#); [Kramka, Larry](#); [Symons, Brian D](#); [Jamie Mehle \(SWLP\)](#); [Joscelyn Skandel \(SWLP\)](#)  
**Subject:** Remedial Action Construction Completion  
**Date:** Wednesday, May 29, 2024 9:40:00 AM

---

Greg,

This email is a follow-up to our call on May 15, 2024 regarding the Upland Remedial Action Construction Completion report submitted for the SWL&P MGP site. Below are some comments concerning the remedial action construction that we discussed:

The excavation of the Horton sphere area has shown significant migration of contamination into the Miller Creek formation clay. This contradicts Foth's assertion that the low permeability of the Miller Creek prevented migration of contamination into the Miller Creek formation. As a result the conceptual site model used to facilitate design of the remedial action appears in need of modification. Additional site investigation is necessary to determine the degree and extent of contamination that has migrated into the Miller Creek formation in the area and down gradient of the former Horton sphere and potentially in other areas of the site. This is a requirement of Wisconsin Administrative Code ch. NR 716. Investigation and potentially evaluation of remediation options will be necessary prior to closure of the site. We discussed various ways this additional investigation may be conducted due to the heavy use of the properties involved. This may include an initial investigation using in situ screening. This may need to be followed up with additional permanent monitoring wells to determine degree and extent of contamination. We also discussed timing of the additional investigation. Waiting until additional information is gathered from the remedial action system prior to conducting additional investigation may be acceptable but this issue should be addressed as soon as practical. Also, considering the new information concerning migration of contaminants into the Miller Creek formation, SWL&P should reassess other areas of the site to determine if additional investigation is needed. The DNR expects a work plan be submitted as soon as practical to address the above.

The groundwater sample results presented during the meeting included results from the replacement monitoring well MW-4B. This well appears to have been installed with its screened interval and filter pack extending into the ORC amended backfill for the Horton sphere excavation. It is our opinion this situation could allow groundwater, treated with ORC to enter the filter pack and screen of the well. Based on our previous discussions and comments expressed by the DNR in previous letters, the DNR expected this well be installed below the excavation and ORC backfill to evaluate groundwater contaminant concentrations vertically. With the investigation activities discussed above the DNR expects a piezometer be installed at the location of MW-4B (and potentially other areas of the site) to evaluate the vertical extent of contamination. This work could be conducted following an initial

assessment.

Please contact me if you have any questions.

**We are committed to service excellence.**

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

John Sager

Hydrogeologist – Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

1701 N. 4<sup>th</sup> St.

Superior, WI 54880

Phone: (715) 919-7239

[john.sager@wisconsin.gov](mailto:john.sager@wisconsin.gov)



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

