

Willkom, Mae - DNR

From: Freeman, Brian <freeman.brian@epa.gov>
Sent: Tuesday, December 9, 2014 9:30 AM
To: Willkom, Mae - DNR
Cc: Bartholomew, Craig O CIV (US) (craig.o.bartholomew2.civ@mail.mil); Radloff, Mandy J Ms CIV USA IMCOM (mandy.radloff@us.army.mil)
Subject: RE: Fort McCoy Closed LF #2 and Fire Training Burn Pit #1
Attachments: image001.gif; image002.gif; image003.gif; image004.gif; image005.gif; image006.gif

Hi Mae,

In response to this email and our recent telephone discussion, it is my understanding and judgment as project manager that EPA understands and agrees with the accuracy of these clarifications made in your attached email below, and we definitely feel that for the reasons stated, and the data and rationale provided to us in materials from the Army on these locations, that groundwater monitoring can be discontinued in solid waste management units (SWMUs) CLF2 (Closed Landfill number 2) and FTBP1 (Fire Training Burn Pit number 1).

Please contact me if you need any further clarification on this letter.

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From: Willkom, Mae - DNR [Mae.Willkom@wisconsin.gov]
Sent: Monday, December 8, 2014 12:56 PM
To: Freeman, Brian
Cc: Bartholomew, Craig O CIV (US) (craig.o.bartholomew2.civ@mail.mil); Radloff, Mandy J Ms CIV USA IMCOM (mandy.radloff@us.army.mil)
Subject: Fort McCoy Closed LF #2 and Fire Training Burn Pit #1

Brian,

Thank you for forwarding a copy of Margaret Guerriero's letter of December 1, 2014, to Mandy Radloff, Chief of the O&M Division at Fort McCoy, regarding discontinuation of groundwater monitoring at two Fort McCoy sites, i.e. Closed Landfill #2 and Fire Training Burn Pit #1.

DNR has concerns that certain closure considerations characterized in Ms. Guerriero's letter could potentially be confusing to future reviewers. I am not suggesting that the letter be revised, only that factual statements from the letter be clarified for the file record, in order to minimize future confusion as DNR takes the regulatory lead on these sites. Please reply to this email and acknowledge that you understand and agree with the accuracy of these clarifications, and confirm EPA's intent to approve discontinuation of groundwater monitoring at these sites.

- Paragraph 2 of the letter cites "over 20 years of quarterly monitoring data. . ." While it appears that groundwater sampling was indeed conducted over a period of nearly 20 years, and some initial sampling was conducted quarterly, some of the subsequent groundwater monitoring was conducted semi-annually and only from selected wells.

- Paragraph 2 also cites “averages for contaminants at or below maximum contaminant levels (MCLs).” Although these sites have not yet been formally reviewed by DNR for site closure, no methods for statistically valid averaging site data have thus far been formally presented. However, DNR administrative rules as currently implemented do allow for site closure before state groundwater quality standards are achieved, provided that: 1) the source of the groundwater contamination is removed or contained to the extent practicable; 2) the groundwater plume is stable or receding; 3) natural attenuation will reduce groundwater contamination to below standards within a reasonable period of time; and 4) no threat to public health and safety exists. It should be noted that state standards are generally equal to (or are more stringent than) MCLs.

- In addition, Paragraph 2 states that institutional controls are “in place.” While it may be true that current Fort McCoy zoning constitutes one form of institutional control, the necessity for additional IC requirements (e.g. maintenance of an existing cap over waste) will be determined at the time of site closure review by DNR.

- Paragraph 3 states that official closure of these two sites by DNR “will be completed when all areas at the site are remediated.” It is DNR’s position that site closure requirements enumerated in the second bullet point above have likely been met, and that it is appropriate for Fort McCoy to submit these sites for closure review by the DNR’s West Central Region Closure Committee at this time.

Thank you for your continued assistance, Brian. It has been a pleasure working with you on these sites. Good luck in your retirement.

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Mae E. Willkom

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