



November 14, 2018 – Delivered electronically only

Ms. Karen Kirchner, RPM
U.S. EPA Region 5
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SUBJECT: Confirmation of Modification of Long-Term Monitoring Plan for
N. W. Mauthe Superfund Site, 725 S. Outagamie St., Appleton, WI
WDNR BRRTS #:02-45-000127

Dear Ms. Kirchner:

The Wisconsin Department of Natural Resources (DNR) is in receipt of the November 13, 2018 response from the United States Environmental Protection Agency (USEPA) to the DNR's September 19, 2018 *Recommendation for Modification of Long-Term Monitoring Plan* for the N. W. Mauthe Superfund site (Site). The purpose of this letter is to acknowledge USEPA's agreement with the recommendations and two noted exceptions.

Long-Term Monitoring Plan (LTMP)

DNR will implement the following LTMP with the October 2018 – September 2019 O&M contract period:

1. All wells will continue to be inspected annually in September and water level elevations recorded;
2. Total (dissolved) chromium will be analyzed every two years in September at MW-101, MW-102, MW-103, MW-104, MW-107, MW-109, MW-110, MW-111, MW-112 and MW-113;
3. Total (dissolved) chromium will continue to be analyzed every four years in September at perimeter wells W-2, W-8, W-15, MW-105, MW-106 and MW-108;
4. Manganese will continue to be analyzed every four years in September at all wells;
5. Cyanide will be analyzed every two years in September at MW-110, MW-111 and MW-112; and
6. VOCs will be analyzed every two years in September at MW-107, MW-109, MW-110, MW-111, MW-112 and MW-113.

At the request of USEPA, sampling will take place in September as opposed to March/April based on the historical results. In addition, three well volumes will be purged from W-2, W-8, W-15, MW-105, MW-106 and MW-108 and stabilization parameters monitored prior to performing low-flow sampling from these wells.

A spreadsheet summarizing the modified LTMP is attached for your use (*TABLE 4 – REVISED NOVEMBER 2018, Groundwater Monitoring Wells and Piezometers Sampling Frequency*).

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As a result of performing the sampling every two years or every four years in September as opposed to March/April per USEPA's request, the next routine groundwater monitoring events will take place as follows:

- September 2019 (two-year and four-year event);
- September 2021 (two-year event); and
- September 2022 (two-year and four-year event).

Reporting

The following reporting schedule will apply for the Site:

- A. Submittal of monthly Status Reports to DNR (contract year October through September) per State contract requirements.
- B. Submittal of annual (September) groundwater analytical lab sheets to DNR via email upon receipt.
- C. Submittal of an annual O&M Report to DNR in October via email and a hard copy summarizing the contract year Status Reports, annual groundwater data and Industrial Wastewater Discharge Permit compliance.
 - a. DNR will submit the annual O&M Report to USEPA via email only based on conversation in September 2018 that USEPA is now able to accept electronic submittals.
 - b. DNR will also continue to upload the O&M Report to the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web under BRRTS #02-45-000127: [WDNR BRRTS on the Web](#).

Thank you for your detailed review of the September 2018 *Recommendation for Modification of Long-Term Monitoring Plan* and historical O&M Reports and your response within the requested timeframe. Please contact me with any questions in Oshkosh by phone at 920-424-7887 or by email at jennifer.borski@wisconsin.gov.

Sincerely,



Jennifer Borski
Hydrogeologist
Remediation & Redevelopment Program

Attach: TABLE 4 – REVISED NOVEMBER 2018, *Groundwater Monitoring Wells and Piezometers Sampling Frequency*

N. W. Mauthe Superfund Site

TABLE 4 - REVISED NOVEMBER 2018
Groundwater Monitoring Wells and Piezometers
Sampling Frequency

Well ID	Water Level	pH	Temperature	Specific Conductivity	Dissolved Oxygen	Redox	Ferrous Iron	Chromium Total Dissolved (Filtered)	Chromium Hexavalent (Unfiltered)	Manganese	Cyanide	Zinc	VOCs
<i>W-2</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
<i>W-8</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
<i>W-15</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
MW-101	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			
MW-102	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			
MW-103	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			
MW-104	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			
<i>MW-105</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
<i>MW-106</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
MW-107	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			2YR
<i>MW-108</i>	A	4YR	4YR	4YR	4YR	4YR	4YR	4YR		4YR			
MW-109**	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			2YR
MW-110**	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR	2YR		2YR
MW-111**	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR	2YR		2YR
MW-112**	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR	2YR		2YR
MW-113**	A	2YR	2YR	2YR	2YR	2YR	4YR	2YR		4YR			2YR
PZ-1													
PZ-2													
PZ-3													
PZ-4													
PZ-5*	A												
PZ-6*	A												
PZ-7*	A												
PZ-8*	A												

Quality Assurance/Quality Control (QA/QC) must be performed in compliance with s. NR 716.13(6), Wis. Adm. Code

- A = annual (**Sept**) - Note: A sampling revised by USEPA 11/13/18 from Mar/Apr to **Sept**
- SA - semi-annual (Mar/Apr and Sept) - Note: Change from SA to **2YR** sampling approved by USEPA 11/13/18 for 2018-2019 O&M contract.
- 2YR = every two years (**Sept 2019, Sept 2021, etc.**) - Note: 2YR sampling revised by USEPA 11/13/18 from Mar/Apr to **Sept** for 2018-2019 O&M contract
- 4YR = every four years (**Sept 2019, Sept 2023, etc**) - Note: 4YR sampling revised by USEPA 11/13/18 from Mar/Apr to **Sept** for 2018-2019 O&M contract
- Piezometers 1-4 abandoned May 2004 (terminated in collection trenches)
- Hexavalent chromium eliminated October 2006
- Zinc eliminated August 2007

Bold Italics During 4YR sampling, purge three well volumes and monitor stabilization parameters prior to low-flow sampling per USEPA 11/13/18

* installed May 2005

** installed May 2006