

Final Closeout Report Scrap Processing Co., Inc. Superfund Site Medford, Wisconsin

I. Introduction

This Final Close Out Report documents that the U.S. Environmental Protection Agency (EPA) has determined, in accordance with Close Out Procedures for National Priorities List Sites (OSWER Directive 9320.2-22, May 2011), that all appropriate response actions at the Scrap Processing Co., Inc. Superfund Site have been successfully implemented in accordance with EPA's 1997 Record of Decision (ROD) and 2016 Explanation of Significant Differences (ESD).

II. Summary of Site Conditions

Background

The Scrap Processing Site (site) is an active scrap yard which collects scrap cars, aluminum, and other metal waste. The site is approximately 19.5 acres and is bordered by Allman Avenue to the north, the Black River to the west and a railroad to the east. The City of Medford maintains a park along the west shore of the Black River. Land use surrounding the site is mixed. North of the Site is an electrical substation. Land use south of the site is a mixture of residential and industrial. Northeast of the site the land use is primarily residential.

From the 1950s until the early 1980s, the Scrap Processing Company accepted and processed batteries. The batteries were dismantled, and the lead battery cores were recovered. Approximately 8,000 to 10,000 batteries per month were cracked and salvaged at the facility. Battery acid was collected in an unlined lagoon that was located south of the battery cracking building. Nearly 400,000 gallons of liquid waste was released to the lagoon. Subsequent investigations revealed an underground storage tank at the site.

Site topography is flat, with some areas of irregular terrain. The western portion of the study area slopes downhill, to city of Medford property and the Black River. Several conveyances carry drainage and surface runoff from the facility into the south-flowing Black River. Available geologic information indicates that the bedrock is primarily early to middle Proterozoic crystalline igneous and metamorphic rock of the North American Cambrian shield. Two overburden aquifers are identified. A shallow sand and gravel aquifer extends from the surface to a depth varying from 15 to 25 feet below ground surface and behaves as a water table aquifer. The groundwater flow direction in this aquifer is to the west-northwest. This aquifer is not used as a potable water source on site or downgradient from the site. The shallow sand and gravel aquifer is separated from a deeper overburden aquifer by a tight clay that serves as a confining layer. The potentiometric surface of the deep overburden aquifer is above ground level. The higher

total head in the deeper aquifer in addition to the tight clay between the two aquifers will minimize downward leakage of water from the upper aquifer into the deeper aquifer. Based on the fact that the shallow aquifer is unconfined and that the deep aquifer potentiometric surface is higher than the shallow groundwater level, vertical flow of contaminants to the deep aquifer is unlikely. The groundwater flow direction within the deeper aquifer is to the southwest based on the October 1995 groundwater readings. This aquifer is used as a potable water source onsite at several homes near the site.

Primary site contaminants related to the battery cracking activities included lead and polychlorinated biphenyls (PCBs). Contaminants related to the underground storage tank included VOCs and polycyclic aromatic hydrocarbons (PAH). Subsurface soils in the northeastern corner of the site were contaminated with VOCs, semi-volatile organic compounds (SVOCs), and pesticides. The predominant organics in this area were benzene, ethylbenzene, toluene and xylene and PAH compounds. This contamination was caused by a leaking leaded gasoline underground storage tank (UST) removed in 1990 and is clearly separated from the contamination caused by battery cracking operations; the cleanup was addressed under the Wisconsin UST program.

The site was proposed to the National Priorities List (NPL) on September 8, 1983 (48 FR 40674) and listed as final on September 21, 1984 (49 FR 37070). The CERCLIS ID is WHD046536785.

Some of the hazardous substances that were released and/or detected at the site in each media included:

Table 1. Site Contaminants	
Soil	Groundwater
Lead	Trichloroethene
Cyanide	Tetrachloroethene
Toluene	1,2 -Dichloroethane
Xylene	Phenol
Antimony	Heptachlor
Arsenic	Nickel
Barium	Antimony
Nickel	Beryllium
Silver	Cadmium
Thallium	Chromium
Cobalt	Mercury
Copper	Aluminum

Selected Remedy, Remedial Action Objectives, and Enforcement Mechanism

Remediation near the battery cracking building was conducted in the 1980s as a result of a State enforcement action. Specifically, in 1984, a total of 7,200 gallons of contaminated ponded water was pumped and transferred to a manhole in the city park located on the

east side of the river. Contaminated sediment and soil were excavated and removed from the site in 1985.

EPA evaluated the Site under its removal program in 1992. Sampling results showed high levels of lead and PCBs near the battery cracking building. In September 1993, EPA conducted an emergency removal action in the area immediately surrounding the battery cracking building. Soil confirmed to have high concentrations of lead and PCBs was excavated from the south side of the battery cracking building. The outside wall of the battery cracking building, stained with PCB-contaminated oil, was scarified with an air powered chisel. The contaminated building material and excavated soil piles were transported off-site for proper disposal. The excavated areas were sampled to confirm that the PCB-contaminated soils had been removed.

The remedial investigation was conducted from May 11, 1992 to September 30, 1997. The initial investigation concentrated on the perimeter of the property and the battery cracking building area.

Sampling data indicated the Black River sediments were contaminated with a variety of VOCs, SVOCs, and pesticides. This contamination was not consistent with on-site surface soil contamination; therefore, it was determined that the contaminants were not Site-related. Inorganic contamination in sediments could not be attributed to the site, since inorganic contaminants were detected in the background sample. Black River water did not appear to be contaminated with organic and inorganic compounds. The evaluation of this data indicated that these conditions would not pose adverse impacts to the biological resources at the site and adjacent habitats.

The human health risk assessment determined carcinogenic risks were highest for exposure to the PCB contamination near the battery cracking area and the VOC and PAH contamination near the former underground storage tanks. Noncarcinogenic risk was highest for the lead-contaminated soils near the battery cracking area. Risks from exposure to soil were significant, primarily due to the presence of lead and PCBs. Potential risks associated with exposure to groundwater were attributed primarily to the presence of lead near the battery cracking area. The PCB-contaminated soil was adequately addressed during the removal action completed in 1994. The VOC and PAH contamination associated with the former UST was addressed by the Wisconsin Department of Natural Resources (WDNR).

A ROD was signed on September 30, 1997 for the Scrap Processing Site. The remedial action objectives (RAOs) for the site were as described below:

RAOs (including Source Control and Groundwater RAOs)

- Minimize the migration of contaminants from soil that could degrade groundwater quality;
- Reduce the risk to human health by preventing direct contact with and ingestion of contaminants in the soils;

- Minimize the migration of contaminants that could result in degradation of the water quality of the Black River;
- Eliminate or minimize the threat to human health and the environment by preventing exposure to groundwater contaminants;
- Prevent further migration of groundwater contamination; and
- Comply with Federal MCLs and State ARARs.

These objectives were to be accomplished by the following remedial actions:

- Excavation of lead-contaminated soils;
- Off-Site disposal of excavated soil at a solid waste landfill;
- Fencing of the site to limit access;
- Institutional controls (ICs), such as restrictions on land and groundwater use;
- Installation of groundwater monitoring;
- Monitoring of groundwater to ensure the effectiveness of the cleanup and to determine the need for active groundwater remediation; and
- Five-year reviews (FYRs) to assess site conditions, contaminant distributions, and associated site hazards.

Remedy Implementation

The Site cleanup was a fund-financed pilot project. The remedial action was conducted from April 21, 1999 to October 22, 2002 in two phases - one phase for the source control response objectives and one for the groundwater response objectives. The remedial action contract was awarded in April 1999. Site mobilization and excavation of contaminated soils began on October 26, 1999 and continued through December 17, 1999. The soil cleanup level for lead was 500 milligrams per kilogram based on the Wisconsin NR 721 industrial standard. Baseline groundwater sampling was conducted from December 13-17, 1999. A pre-final inspection of the site was conducted on December 21, 1999 by EPA and WDNR. The site achieved construction completion status when the Preliminary Closeout Report was signed on February 24, 2000. Site grading was completed on May 5, 2000. The site security fence was installed on May 31, 2000.

The major components of the remedial action included the following:

- Excavation, treatment, and/or disposal of nearly 17,000 cubic yards of lead-contaminated soils;
- Replacement of excavated soils with clean soil;
- Re-vegetation of excavated areas;
- Installation of a Site security fence;
- Installation of 7 shallow and 4 deep groundwater monitoring wells; and
- Groundwater monitoring to evaluate the effectiveness of the cleanup.

A final site inspection was conducted on August 24, 2000. The remedial action report was issued on November 29, 2000. EPA and the WDNR determined that all remedial action construction activities were performed according to specifications.

Explanation of Significant Differences

On August 29, 2016, EPA issued an Explanation of Significant Differences (ESD) for the Site. The 2016 ESD modified the ROD requirement for ICs for the site through land use and groundwater use restrictions. This ESD accepted WDNR authority to impose any requirements, limitations, or conditions imposed under Wisconsin Statutes Section 292.12(3), and record them in a database maintained by WDNR as the instrument to comply with the IC requirement of the ROD. The WDNR database is called Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW). BOTW is used to assist the public in finding information about properties affected by either residual contamination, use restrictions, and/or continuing obligations (COs). In conjunction with placement of a site on the BOTW, WDNR also issues a COs letter under Section 292.12 of the Wisconsin Statutes to the current site owner to inform the owner of their continuing obligation to comply with the site requirements and to not interfere with or disturb the effectiveness of the remedy. Placement on the BOTW also triggers the requirement in NR 812.09(4)(w) to obtain prior WDNR approval for the reconstruction or installation of any well on the placed property.

COs are legal requirements that apply to a property even after the ownership changes. COs are sometimes called "environmental land use controls" or "institutional controls." When WDNR approves a cleanup with residual contamination, it helps ensure long-term protection of public health and the environment by establishing COs in the approval letter, which is the state's cleanup approval document. Because WDNR does not require removal of all contamination, it is common for approved cleanups to have COs.

Institutional Controls

ICs are required by the 1997 ROD to restrict property use, maintain the integrity of the remedy, and assure the long-term protectiveness for areas which do not allow for Unlimited Use and Unrestricted Exposure (UU/UE). As stated earlier, the 2016 ESD modified the ROD requirement for ICs for the Site through land use and groundwater use restrictions. This ESD accepted WDNR authority to impose any requirements, limitations, or conditions imposed under Wisconsin Statutes Section 292.12(3), and record them in a database maintained by WDNR as the instrument to comply with the IC requirement of the ROD. A summary of the implemented ICs for the site is listed in Table 2.

Table 2. Summary of Implemented ICs

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented
Soil	Yes	Yes	On-Site Property- Soil	Prohibit residential or recreational use	Wisconsin BOTW and COs Letter, July 30, 2018. Completed.
Groundwater	Yes	Yes	On-Site Property - Groundwater	Prohibit groundwater consumption	Wisconsin BOTW and COs Letter, July 30, 2018. Completed.

Maps which depict the current conditions of the site and areas which do not allow for UU/UE are provided in Attachment A.

Final Inspection

A final inspection was conducted on November 14, 2018 by Carrie Stoltz, hydrogeologist for WDNR. The facility manager for Alter Metals participated in the inspection (Alter Metals leases the site from the Scrap Processing Company owner). The purpose of the inspection was to assess the protectiveness of the remedy. At the time of the site visit, Scrap Processing was open for normal business. Security fencing now surrounds the entire facility. The inspector observed that all monitoring wells were abandoned and sealed but could not locate monitoring well MW-10D. The concrete pads and asphalt appeared in good condition during the site visit. All O&M activities were completed at the site. Overall, the property appeared to be in good condition. There were no indications of new contaminant sources on the property that would interfere with the effectiveness of the remedy. There were no activities observed at the site which were inconsistent with the intended use of the facility. There were no major issues noted related to the site.

III. Monitoring Results

Groundwater Monitoring

The groundwater monitoring program was implemented to evaluate the effectiveness of the remedial action. The groundwater monitoring program for the site included the following activities:

Table 2. Summary of Groundwater Monitoring Program	
1	Complete 2 rounds of quarterly sampling and analyses of site monitoring wells.
2	Discontinue groundwater monitoring if no contaminants of concern were detected above the Wisconsin preventative action limits (PALs)

Table 2. Summary of Groundwater Monitoring Program	
3	Continue quarterly sampling for 2 years if Wisconsin PALs were exceeded in the initial two rounds of sampling
4	Continue groundwater monitoring for another three years if Wisconsin PALs were exceeded at the end of 2 years of sampling
5	Evaluate the results of sampling to determine the need for further monitoring or active remediation.

The groundwater monitoring program continued in March 2000 after the baseline groundwater monitoring was conducted. Groundwater standards include Federal Safe Drinking Water Act Maximum Contaminant Levels (MCLs) and the Wisconsin Administrative Code NR140 Groundwater Quality Enforcement Standards (ES) and PALs. Wisconsin PALs were exceeded during the initial two quarterly rounds of sampling. Therefore, additional groundwater sampling rounds were conducted for two more years, in June 2000, October 2000, January 2001, March 2001, June 2001, November 2001, and February 2002.

There were no pesticides or VOCs detected in the deep monitoring wells. There were no PCBs detected in any of the monitoring wells, and there were no Wisconsin ES exceedances for VOCs in any of the monitoring wells. The only VOCs that exceeded the PALs were in monitoring wells MW-1S and MW-2S along the southern property line. The low-level VOC contamination in shallow monitoring wells MW-1S and MW-2S was not attributable to the site for the following reasons:

- The groundwater flow direction in the shallow aquifer is to the west-northwest, and these wells are located along the southern Site property line. Therefore, an off-site source was the likely cause of the contamination.
- VOCs were not typically associated with the current and former site operations.
- The former underground storage tank was located on the opposite side of the site.
- Site operations were primarily conducted in the northern half of the site.

During the February 2002 sampling event, both iron and manganese were detected in several monitoring wells and significantly exceeded their respective Wisconsin PALs and ESs. These metals are believed to be naturally-occurring background constituents. In addition, there are no federal primary drinking water standards or MCLs for iron or manganese. There are only secondary standards based on considerations such as taste, color, and odor. Iron, lead, and manganese were detected in the shallow background monitoring well and in the upgradient monitoring well MW-1S. The iron and manganese concentrations in these wells significantly exceeded the Wisconsin ES while the lead concentrations exceeded the PAL. Iron and manganese concentrations in the deep background monitoring well MBD exceeded the Wisconsin ES and lead exceeded the PAL. Similar concentrations were found in the downgradient monitoring wells MW-2D and MW-1D. Therefore, the heavy metal concentrations can be attributed to background conditions.

The last round of groundwater sampling at the site was performed in February 2002. After an evaluation of all the groundwater monitoring data, EPA and WDNR determined that all Site-related contaminants of concern were below the primary federal MCLs. Therefore, groundwater sampling was terminated. EPA and WDNR decided not to sample the groundwater for an additional 3 years, as discussed in the ROD. Instead, both agencies agreed that sampling should be discontinued and a PAL exemption granted for iron and manganese. Subsequently, Wisconsin adopted an ES of 200 µg/L and a PAL of 40 µg/L for aluminum.

On July 30, 2018, WDNR issued to the Site owner a *Final Case Closure with Continuing Obligations* letter pursuant to WAC NR 726. This letter informed the Site owner of the following: the Site would be delisted from the NPL; PAL exemptions would be granted for iron and manganese, pursuant to NR 140.28, since these contaminants were naturally-occurring and not attributed to the site-related discharges; and, trichloroethylene and tetrachloroethene contamination found at the site originated from an unidentified source. Aluminum was not included under this exemption because aluminum was not detected above its PAL.

EPA approved of modified cleanup goals for trichloroethylene, tetrachloroethene, iron, and manganese for the Scrap Processing Site, and determined that no further groundwater monitoring or response action was necessary, as levels of contamination in groundwater at or near the site remain below health-based levels and federal primary drinking water standards.

IV. Attainment of Groundwater Restoration Cleanup Levels (if applicable)

This section is not applicable. The selected remedy does not require groundwater restoration as a cleanup objective. The selected remedy addressed minimizing the migration of contaminants from soil that could degrade groundwater; minimizing the migration of contaminants that could result in degradation of the water quality of the Black River; preventing exposure to groundwater contaminants; and, preventing further migration of groundwater contamination.

V. Summary of Operation and Maintenance (O&M) Required

Post-remedial action system operations and O&M included groundwater monitoring at the site. All groundwater monitoring activities were completed for the site in 2002. There are no remaining remedial systems operations required for the site. All monitoring wells were properly sealed and abandoned on May 5 and 6, 2017, except monitoring well MW-10D. Monitoring well 10-D could not be properly filled and sealed because it was believed to be missing due to being paved over, covered, or removed during site development activities.

Enforcement and maintenance activities for Institutional Controls (Continuing Obligations) are conducted by the State of Wisconsin using the BRRTS database on the BOTW maintained by WDNR as the instrument to comply with the IC requirement of the ROD.

VI. Demonstration of Cleanup Activity Quality Assurance and Quality Control (QA/QC)

EPA and the State reviewed the Remedial Design and Remedial Action (RD/RA) construction for compliance with quality assurance and quality control (QA/QC) protocols. All design plans and field activities were reviewed to ensure consistency with the ROD, the RD/RA workplans, and federal and state requirements. Construction activities at the site were determined to be consistent with the ROD and the RD plans and specifications.

The design and construction QA/QC program utilized throughout the RD/RA was in accordance with EPA protocols. Details of the analytical procedures used to ensure the quality of work are contained in the approved Quality Assurance Project Plan (QAPP) sections of the RD/RA Work Plan. The QA/QC program utilized was sufficient to allow EPA to make the determination that all reported materials specifications are adequate, and construction methods used allowed remedy construction to be satisfactorily performed in accordance with the ROD. The groundwater monitoring activities have been conducted in accordance with the approved QAPP. The EPA RPM and State regulators visited the site during construction activities to review construction progress and evaluate and review the results of QA/QC activities. Deviations or non-adherence to QA/QC protocols, drawings, or specifications were properly documented and resolved.

All procedures and protocols followed for groundwater and soil sample analysis during the remedial action are well documented. Only EPA analytical methods, or where no EPA methods existed, other Federally approved methods were used. The soil and groundwater samples were analyzed by an EPA-approved laboratory. EPA and the State determined that analytical results were accurate to the degree needed to assure satisfactory execution of the RA.

Long-Term Monitoring. The required long-term monitoring program has been completed for the site. In the event that EPA or WDNR conducts future sampling at the site, all QA/QC procedures will be performed in accordance with applicable professional technical standards, EPA and WDNR requirements, government regulations and guidelines, and specific project goals and requirements.

VII. Five-Year Review

Statutory FYRs are required for the Scrap Processing Site because hazardous substances, pollutants, or contaminants remain at the site above levels that allow for UU/UE. EPA completed the fourth FYR for Site on June 14, 2019. This FYR found that the remedy at the Scrap Processing Site is protective of human health and the environment because the remedy components, including the excavation and removal of contaminated soils, were constructed in accordance with the ROD and ESD, and are functioning as designed. ICs are implemented at the site. The immediate threats have been addressed, and exposure pathways that could result in unacceptable risks are being controlled. All remedial cleanup goals have been achieved at the site. No issues were identified during the fourth FYR that affect the protectiveness of the remedy at the site.

VIII. Site Completion Criteria

The Scrap Processing site meets all the site completion requirements specified in OSWER Directive 9320.2-22, Close-Out Procedures for National Priorities List Sites. The selected remedy addressed the principal risks posed by the Scrap Processing Site by eliminating exposure to contaminated soils and groundwater by excavating, stabilizing and removing contaminated soils, monitoring groundwater, performing O&M activities, and implementing ICs. All appropriate response actions at the site have been successfully implemented in accordance with the 1997 ROD and the subsequent 2016 ESD. The RAO of protecting public health and the environment from contaminants in soils and groundwater has been achieved, and the remedial action has attained its specified cleanup goals. The RAOs and associated cleanup goals are consistent with Agency policy and guidance. Monitoring data from the site provides further assurance that the site no longer poses any threat to human health or the environment. Ongoing O&M activities will be conducted to ensure that the constructed remedial components continue to function as intended, and all required ICs are in place to restrict media use for all areas of the site that do not allow for UU/UE. Based on the above information, EPA has determined that no further Superfund response is necessary at the site to protect human health and the environment. Because the performance standards as set forth in the ROD and the ESD have been achieved, the site is now eligible for deletion from the NPL.

IX. Bibliography

Record of Decision, EPA, September 30, 1997
Explanation of Significant Differences, EPA, August 29, 2016
1st Five-Year Review, EPA, April 28, 2004
2nd Five-Year Review, EPA, April 23, 2009
3rd Five-Year Review, EPA, April 18, 2014
4th Five-Year Review, EPA, June 14, 2019

List of Attachments/Figures

Attachment A – Site Figures/Maps

Figure 1 – Scrap Processing Site and Parcels

Figure 2 – Scrap Processing Site Boundary and Remedy Waste Areas

Attachment B – Wisconsin Continuing Obligations

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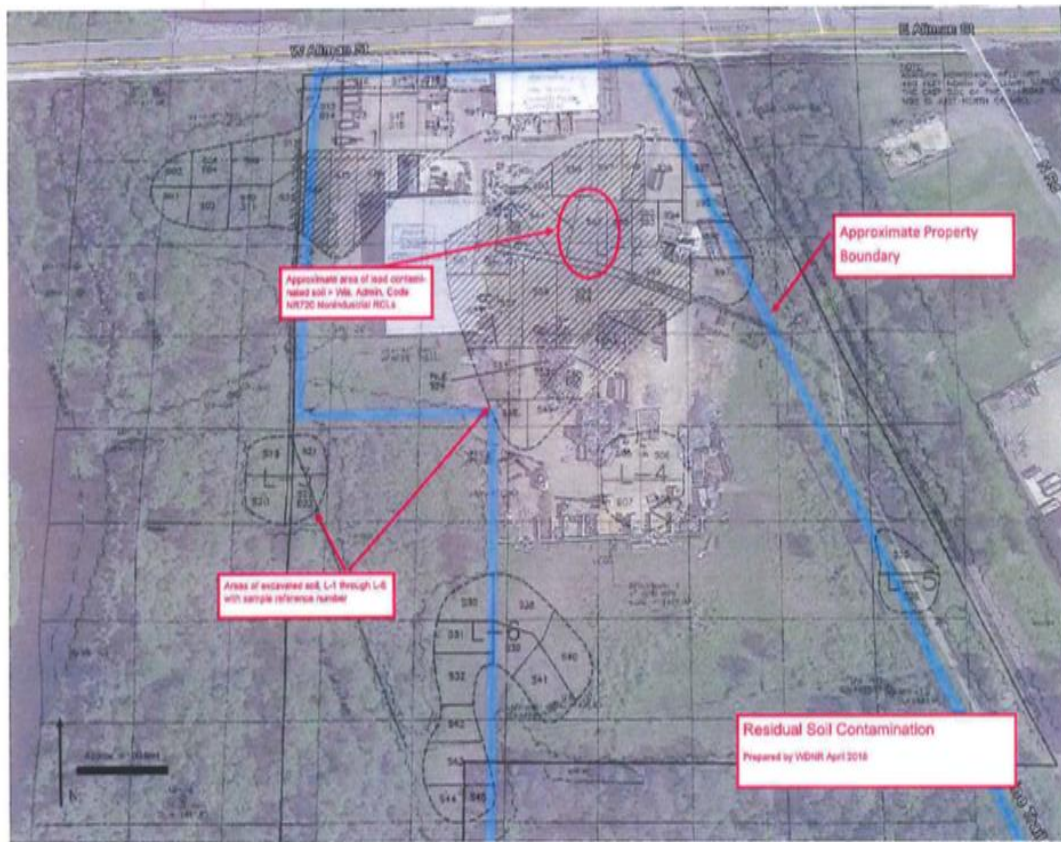
7/9/2020

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Douglas Ballotti, Director
Superfund & Emergency Management Division
Signed by: DOUGLAS BALLOTTI

ATTACHMENT A
Site Figures/Maps

Figure 2. Scrap Processing Site Boundary & Remedy Waste Areas



ATTACHMENT B
Wisconsin Continuing Obligations

Wisconsin Continuing Obligations

Groundwater monitoring conducted at the Site shows that groundwater contaminant levels remain below federal health-based levels. Closure may now be granted under ch. NR 726, WAC, if it is shown that groundwater contaminant concentrations are stable or receding or it is shown the source of the contamination isn't from the site.

U.S. EPA approves of modified cleanup goals for trichloroethylene, tetrachloroethene, iron, manganese, and aluminum for the Scrap Processing Site, and has determined that no further groundwater monitoring or response action is necessary, as levels of contamination in ground water at or near the site remain below health-based levels and federal primary drinking water standards.

The Wisconsin DNR will issue a PAL exemption for trichloroethylene and tetrachloroethene because the source of these compounds likely originated from a site other than Scrap Processing. Therefore, the Site will no longer be required to meet the 0.5 µg/L standard for trichloroethylene and tetrachloroethene.

Shallow groundwater in the area around the Scrap Processing Site has elevated concentrations of inorganic compounds including iron and manganese as a result of discharges at the facility. The background levels for iron and manganese in the shallow groundwater monitoring wells are consistently less than the ES standards. Given adequate time, the iron and manganese contamination present above Wisconsin DNR standards in the shallow ground water as a result of discharges from the operations of Scrap Processing will decrease to background concentrations as the result of natural attenuation processes. The Wisconsin DNR will grant an exemption for iron and manganese under NR 140.28(2), based on a finding that the Wisconsin ESs can be achieved in shallow ground water through natural attenuation under NR 726.05(6), WAG within a reasonable period of time.

The background levels for iron and manganese in the deeper site wells consistently exceed ESs. Based on Wisconsin DNR's evaluation, groundwater in this area have higher naturally occurring background levels of iron and manganese. The Wisconsin DNR will grant an exemption for iron and manganese under NR 140.28(4) based on a finding that the background concentrations of these parameters exceed Wisconsin ESs.

The shallow and deep groundwater in the area around the Scrap Processing Site has elevated concentrations of aluminum as a result of discharges at the facility. The background levels for aluminum in the shallow and deep groundwater are consistently less than the ESs. Given adequate time, the aluminum contamination present as a result of discharges from the operations of Scrap Processing at concentrations above Wisconsin DNR standards in both shallow and deep ground water will decrease to background concentrations as the result of natural attenuation processes. The Wisconsin DNR will grant an exemption for aluminum under NR 140.28(2), based on a finding that the Wisconsin PALs can be achieved in shallow ground water through natural attenuation under NR 726.05(6), WAC within a reasonable period of time.

U.S. EPA and Wisconsin DNR have determined that no further groundwater monitoring or response action is necessary as levels of contamination continue to be below health-based levels and federal primary drinking water standards. Iron, Manganese, Aluminum, Trichloroethylene and Tetrachloroethene will receive PAL exemptions. Iron and Manganese will receive an exemption under NR 140.28(4) for exceeding ES standards.

No groundwater response action, or further monitoring, is necessary as the periodic monitoring conducted in 2002 and 2015 has shown contaminant levels to be stable and receding, and below health-based levels and federal primary drinking water standards. The Wisconsin DNR has determined that trichloroethylene and tetrachloroethene will receive exemptions from compliance with the PALs because these contaminants are likely from an off-site source. In addition, Wisconsin DNR will grant an exemption under NR 140.28(2) and 140.28(4) for iron, manganese and aluminum based on a finding that the elevated levels of iron and manganese are background and the groundwater enforcement standards can be achieved through natural attenuation under NR 726.05(6), WAG within a reasonable period of time. These exemptions will be granted by the Wisconsin DNR and will be supported by U.S. EPA.