



The Chemours Company
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May 18, 2020

Mr. Phil E. Richard
Hydrogeologist
Wisconsin Department of Natural Resources
Park Falls Service Center
875 4th Avenue South
Park Falls, WI 54554-1130

**RE: COVID-19 Related Project Impacts - Addendum
Former DuPont Barksdale Works
72315 State Highway 13
Town of Barksdale, Bayfield County, Wisconsin
FID No.: 804009140
EPA ID No.: WIR000133447
BRRTS No. 02-04-00156**

Dear Mr. Richard:

I appreciate you and Chris Saari taking the time on Tuesday, May 12, 2020 to discuss the proposed placement of soil at the Former DuPont Barksdale Works (site) from the Wisconsin Department of Transportation (WisDOT) Boyd Creek Bridge replacement project. As requested, this letter provides additional information to the COVID-19 Related Project Impacts letter dated April 23, 2020 (attached). The Chemours Company FC, LLC (Chemours) requested regulatory flexibility to allow for the stockpiling of WisDOT soil at the site to accommodate COVID-19 related delays in the April 23, 2020 letter. These delays affected a wetland identification field visit, field surveying, the development and design of a grading plan, and completion of an Interim Action Plan. The requests in the letter included the following:

- ***WDNR approval to stockpile WisDOT soil onsite until 2021:*** *The soil to be imported and placed on the site has concentrations of site-related constituents that are generally consistent with those found in soil in the proposed placement area. The concentrations found in the soil to be imported are also below screening criteria that are protective of human health for direct contact. Current Wisconsin regulations include standards for the management of contaminated soil. To allow for the stockpiling of WisDOT soil onsite until 2021, we are requesting an exemption from:*
 - *The requirement to provide an Interim Action Plan/Soil Management Plan prior to receiving and stockpiling WisDOT soil. An Interim Action Plan will be developed and submitted prior to the final placement of the WisDOT soil.*
 - *The requirements for storage of contaminated soil as specified in NR 718.05, which includes storage duration and stockpiling cover/anchor requirements. The soil is proposed to be stockpiled in the same general area as where it will be spread for final placement.*
 - *The requirement that that soil be placed more than 100 feet from wetlands. Wetland identification requests were submitted to the WDNR in March 2020 for the proposed soil placement area. Travis Holte from the WDNR indicated that there may be potential delays with the identification requests due to COVID-19 related impacts. WDNR wetland maps do not show known wetlands in proposed stockpile locations; however, wetlands are mapped within 100 feet. The proposed soil placement*



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location is located in a former production area and if any wetlands were found in the area, they would likely be considered artificial.

Based on our discussion on May 12, 2020, the following information is provided to supplement the requests above:

- The proposed stockpile area is located in the area of the former Oil of Vitriol Plant (Use Area PAT) as shown on the attached Figures.
- Several historical soil samples have been collected in the proposed stockpile location area as shown on Figure 2. As indicated previously, the soil to be imported and placed on the site has concentrations of site-related constituents that are generally consistent with those found in soil in the proposed stockpile area and are below screening criteria that are protective of human health for direct contact (see Table 1, attached). The soil-to-groundwater migration pathway is incomplete as there is no use of groundwater downgradient of the proposed soil stockpile area (i.e. municipal supply and contractual restrictions).
- The WDNR submitted the results of their wetland identification review of the area on May 7, 2020. No wetlands were identified in the proposed soil stockpile area; however, wetlands and a waterway were identified north of the area. The identified waterway (former process ditch) is intermittent and typically contains little to no water. The waterway is located upstream of the Upper Central Drainage (WBIC 5001016), which was evaluated for navigability by the WDNR in 2017. The WDNR determined that the Upper Central Drainage was considered to be non-navigable at a location about 0.5 miles southeast of the proposed stockpile location. It is not expected that the waterway identified in the in the area of proposed stockpile location is capable of floating on a regularly recurring basis the lightest boat or skiff. Based on the information above, the waterway is not considered to be navigable and therefore not subject to the 300 feet setback requirements included in NR 718. The proposed stockpile area is located more than 100 feet from the wetlands and waterway as shown on Figure 2.
- Erosion controls will be installed and maintained in the area of the stockpile(s). The site is currently covered under Wisconsin Pollutant Discharge Elimination System General Permit No. WI-S067831-05: Construction Site Storm Water Runoff, which was renewed on August 10, 2018 and expires on August 10, 2021.



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If you have any questions or comments, please feel free to contact me or Cary Pooler. I can be reached by telephone at (812) 923-1136 or by email at Bradley.S.Nave@chemours.com. Cary Pooler can be reached by telephone at (502) 252-5878 or by email at cary.pooler@aecom.com.

Sincerely,

A handwritten signature in blue ink that reads 'Bradley S. Nave'.

Bradley S. Nave
Chemours Corporate Remediation Group

Attachments: Figure 1: Project Location Map
 Figure 2: Proposed Stockpile Area
 Table 1: Soil Analytical Results - NNOCs
 COVID-19 Related Project Impacts letter dated April 23, 2020

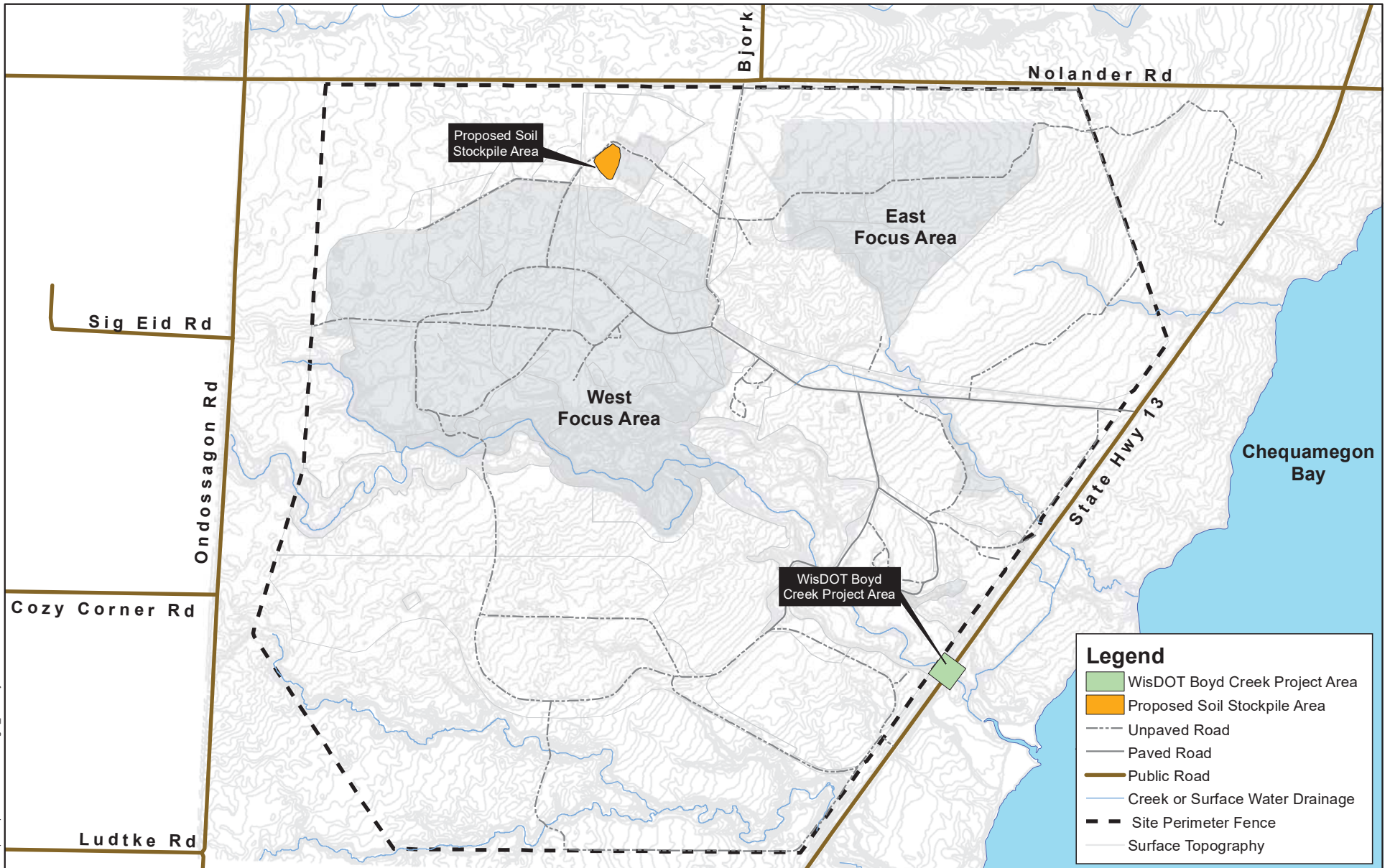
Cc: Chris Saari, WDNR
 Cary Pooler, AECOM
 Eric Schmidt, AECOM

Figures

Figure 1: Project Location Map

Figure 2: Proposed Stockpile Area

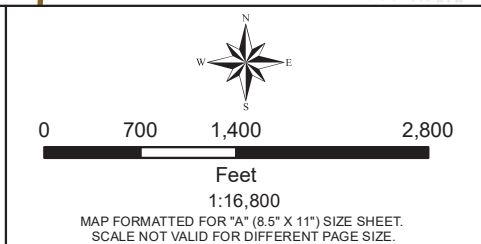
G:\Projects\Barksdale\GIS\Maps\Maps 2020\WisDOT\Fig 1_Site Layout.mxd



Legend

- WisDOT Boyd Creek Project Area
- Proposed Soil Stockpile Area
- Unpaved Road
- Paved Road
- Public Road
- Creek or Surface Water Drainage
- Site Perimeter Fence
- Surface Topography

Area Map (Optional)

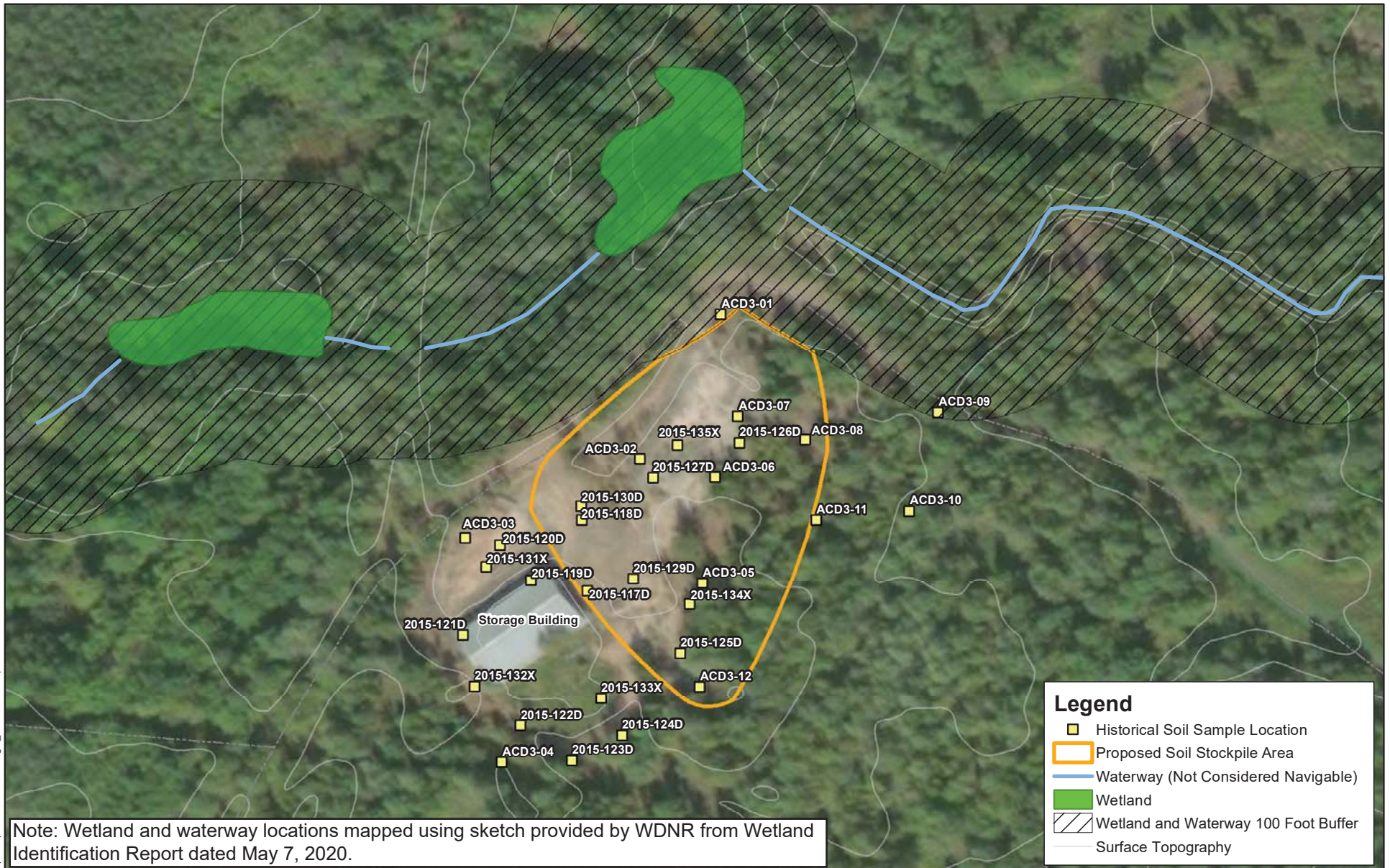


FILE NUMBER:
 DESIGNED BY: NS
 DRAWN BY: VN
 DATA QUALITY CHECK BY: ES

AECOM
 AECOM
 500 West Jefferson Street
 Suite 1600
 Louisville, Kentucky 40202

Project Location Map
 Former DuPont Barksdale Works
 Barksdale, Wisconsin 54806

PROJECT NUMBER:
 60505619
 DATE:
 May 2020
 FIGURE NUMBER:
 1



Legend

- Historical Soil Sample Location
- Proposed Soil Stockpile Area
- Waterway (Not Considered Navigable)
- Wetland
- Wetland and Waterway 100 Foot Buffer
- Surface Topography

Note: Wetland and waterway locations mapped using sketch provided by WDNR from Wetland Identification Report dated May 7, 2020.

Area Map (Optional)	<p>Feet 1:1,500 MAP FORMATTED FOR "A" (8.5" X 11") SIZE SHEET. SCALE NOT VALID FOR DIFFERENT PAGE SIZE.</p>	FILE NUMBER: <hr/> DESIGNED BY: DN <hr/> DRAWN BY: VN <hr/> DATA QUALITY CHECK BY: ES	<p>AECOM 500 West Jefferson Street Suite 1600 Louisville, Kentucky 40202</p>	<p>Proposed Stockpile Area</p> <p>Former DuPont Barksdale Works Barksdale, Wisconsin 54806</p>	PROJECT NUMBER: 60505619 <hr/> DATE: May 2020 <hr/> FIGURE NUMBER: 2
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Table

Table 1: Soil Analytical Results - NNOCs

Table 1
Soil Analytical Results - NNOCs
Use Area PAT
Former Barksdale Works Site
Town of Barksdale, Bayfield County, Wisconsin

Location ID			ACD3-01	ACD3-02	ACD3-03	ACD3-04	ACD3-05	ACD3-06	ACD3-07	ACD3-08	ACD3-09	ACD3-10	ACD3-11	ACD3-12	2015-117D	2015-118D
Field Sample ID			9400331	9400540	9400749	9400958	9401167	9401376	9401585	9401794	9402003	9402212	9402421	9402630	SITG-151007-117D-0-0.5	SITG-151006-118D-0-0.5
Date Sampled			08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	08/27/2001	10/07/2015	10/06/2015
Start Depth - End Depth			0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 0.5	0 - 0.5
Parameter Name	Units	BAR RCL (mg/kg)	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result
2,4,6-trinitrotoluene	mg/kg	124	<0.018	<0.016	<0.014	<0.017	<0.015	0.065	0.031	0.033	0.029	0.05	0.054	0.03	0.43	<0.2
2-amino-4,6-dinitrotoluene	mg/kg	900	<0.038	<0.034	<0.031	<0.036	<0.033	<0.037	<0.035	<0.031	<0.032	<0.031	<0.033	<0.034	<0.21	<0.2
4-amino-2,6-dinitrotoluene	mg/kg	893	<0.025	<0.022	<0.02	<0.023	<0.021	0.025	<0.023	<0.02	<0.021	0.023	0.025	<0.022	<0.21	<0.2
1,3,5-trinitrobenzene	mg/kg	13100	<0.016	<0.015	<0.013	<0.015	<0.014	<0.016	<0.015	<0.013	<0.014	<0.013	<0.014	<0.014	<0.21	<0.2
1,3-dinitrobenzene	mg/kg	36.9	<0.03	<0.027	<0.024	<0.028	<0.026	<0.029	<0.028	<0.025	<0.025	<0.025	<0.026	<0.026	<0.21	<0.2
2-nitrotoluene	mg/kg	18.4	<0.026	<0.023	<0.021	<0.025	<0.022	<0.025	<0.024	<0.021	<0.022	<0.021	<0.023	<0.023	<0.21	<0.2
3-nitrobenzene	mg/kg	36.9	<0.033	<0.029	<0.027	<0.031	<0.028	<0.031	<0.03	<0.027	<0.028	<0.027	<0.029	<0.029	<0.21	<0.2
4-nitrobenzene	mg/kg	198	<0.1	<0.091	<0.083	<0.097	<0.088	<0.098	<0.094	<0.084	<0.087	<0.084	<0.089	<0.09	<0.21	<0.2
nitrobenzene	mg/kg	43.2	<0.016	<0.015	<0.013	<0.015	<0.014	<0.016	<0.015	<0.013	<0.014	<0.013	<0.014	<0.014	<0.21	<0.2
HMX	mg/kg	22500	<0.021	<0.018	<0.017	<0.019	<0.018	<0.02	<0.019	<0.017	<0.017	<0.017	<0.018	<0.018	--	--
PETN	mg/kg	737	<0.1	<0.091	<0.083	<0.097	<0.088	<0.098	<0.094	<0.084	<0.087	<0.084	<0.089	<0.09	--	--
RDX	mg/kg	48.6	<0.027	<0.024	<0.022	<0.026	<0.023	<0.026	<0.025	<0.022	<0.023	<0.022	<0.024	<0.024	--	--
Tetryl	mg/kg	911	<0.03	<0.027	<0.024	<0.028	<0.026	<0.029	<0.028	<0.025	<0.025	<0.025	<0.026	<0.026	--	--
nitroglycerin	mg/kg	36.9	0.21	<0.073	<0.066	<0.077	<0.07	<0.078	<0.075	<0.067	<0.069	<0.067	<0.071	<0.072	--	--
2,4-dinitrotoluene	mg/kg	7.03	<0.047	0.042	<0.038	<0.044	<0.04	<0.044	0.12	<0.038	<0.039	0.18	<0.04	<0.041	<0.21	<0.2
2,6-dinitrotoluene	mg/kg	7.03	<0.016	0.018	<0.013	<0.015	<0.014	<0.016	<0.015	<0.013	<0.014	0.064	<0.014	<0.014	<0.21	<0.2
2,3-dinitrotoluene	mg/kg	7.03	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
2,5-dinitrotoluene	mg/kg	7.03	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
3,4-dinitrotoluene	mg/kg	7.03	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
3,5-dinitrotoluene	mg/kg	7.03	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
2,4,6-trinitro-3-xylene	mg/kg	124	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,2-dimethyl-3,4-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,2-dimethyl-3,5-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,2-dimethyl-3,6-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,2-dimethyl-4,5-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,3-dimethyl-2,4-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,3-dimethyl-2,5-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,4-dimethyl-2,3-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,4-dimethyl-2,5-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,4-dimethyl-2,6-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,5-dimethyl-2,3-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2
1,5-dimethyl-2,4-dinitrobenzene	mg/kg	111	--	--	--	--	--	--	--	--	--	--	--	--	<0.21	<0.2

Notes:

¹: Maximum concentration of on-site samples included on this table

²: Maximum concentration of WisDOT soil/sediment samples per results submitted to WDNR on 7/16/18 by WisDOT

2001 results are from QES-DEN using lab method 8321

2015 results are from ECCS using lab method 8270

mg/kg: milligrams per kilogram

BAR RCL: Site Specific Recreational Residual Contaminant Level for direct contact

ND: Not detected

Table 1
Soil Analytical Results - NNOCs
Use Area PAT
Former Barksdale Works Site
Town of Barksdale, Bayfield County, Wisconsin

Location ID			2015-119D	2015-120D	2015-121D	2015-122D	2015-123D	2015-124D	2015-125D	2015-126D	2015-127D	2015-129D	2015-130D
Field Sample ID			SITG-151006-119D-0-0.5	SITG-151006-120D-0-0.5	SITG-151006-121D-0-0.5	SITG-151006-122D-0-0.5	SITG-151006-123D-0-0.5	SITG-151007-124D-0-0.5	SITG-151007-125D-0-0.5	SITG-151007-126D-0-0.5	SITG-151007-127D-0-0.5	SITG-151007-129D-0-0.5	SITG-151007-130D-0-0.5
Date Sampled			10/06/2015	10/06/2015	10/06/2015	10/06/2015	10/06/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015
Start Depth - End Depth			0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Parameter Name	Units	BAR RCL (mg/kg)	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result
2,4,6-trinitrotoluene	mg/kg	124	<0.2	0.2	0.2	0.36	0.28	<0.2	0.44	<0.21	<0.21	0.23	0.31
2-amino-4,6-dinitrotoluene	mg/kg	900	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
4-amino-2,6-dinitrotoluene	mg/kg	893	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,3,5-trinitrobenzene	mg/kg	13100	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,3-dinitrobenzene	mg/kg	36.9	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
2-nitrotoluene	mg/kg	18.4	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
3-nitrobenzene	mg/kg	36.9	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
4-nitrobenzene	mg/kg	198	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
nitrobenzene	mg/kg	43.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
HMX	mg/kg	22500	--	--	--	--	--	--	--	--	--	--	--
PETN	mg/kg	737	--	--	--	--	--	--	--	--	--	--	--
RDX	mg/kg	48.6	--	--	--	--	--	--	--	--	--	--	--
Tetryl	mg/kg	911	--	--	--	--	--	--	--	--	--	--	--
nitroglycerin	mg/kg	36.9	--	--	--	--	--	--	--	--	--	--	--
2,4-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	0.65	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
2,6-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
2,3-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
2,5-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
3,4-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
3,5-dinitrotoluene	mg/kg	7.03	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
2,4,6-trinitro-3-xylene	mg/kg	124	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-dimethyl-3,4-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-dimethyl-3,5-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-dimethyl-3,6-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-dimethyl-4,5-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,3-dimethyl-2,4-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,3-dimethyl-2,5-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,4-dimethyl-2,3-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,4-dimethyl-2,5-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,4-dimethyl-2,6-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,5-dimethyl-2,3-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21
1,5-dimethyl-2,4-dinitrobenzene	mg/kg	111	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.21	<0.21	<0.21	<0.21	<0.21

Notes:

¹: Maximum concentration of on-site samples included on this table

²: Maximum concentration of WisDOT soil/sediment samples per results submitted to WDNR on 7/16/18 by WisDOT

2001 results are from QES-DEN using lab method 8321

2015 results are from ECCS using lab method 8270

mg/kg: milligrams per kilogram

BAR RCL: Site Specific Recreational Residual Contaminant Level for direct contact

ND: Not detected

Table 1
Soil Analytical Results - NNOCs
Use Area PAT
Former Barksdale Works Site
Town of Barksdale, Bayfield County, Wisconsin

Location ID			2015-130D	2015-131X	2015-131X	2015-132X	2015-133X	2015-134X	2015-135X	Maximum Soil Concentration From Use Area PAT ¹	Maximum Soil Concentration From Samples Collected as Part of WisDOT Boyd Creek Project ²
Field Sample ID			SITG-151007-130D-0-0.5-D	SITG-151007-131X-0-1	SITG-151007-131X-0-1-D	SITG-151007-132X-0-1	SITG-151007-133X-0-1	SITG-151007-134X-0-1	SITG-151007-135X-0-1		
Date Sampled			10/07/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015	10/07/2015		
Start Depth - End Depth			0 - 0.5	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1		
Parameter Name	Units	BAR RCL (mg/kg)	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result	Report Result		
2,4,6-trinitrotoluene	mg/kg	124	<0.2	0.23	0.32	<0.2	0.33	0.35	0.25	0.44	0.48
2-amino-4,6-dinitrotoluene	mg/kg	900	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	0.41
4-amino-2,6-dinitrotoluene	mg/kg	893	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	0.025	0.41
1,3,5-trinitrobenzene	mg/kg	13100	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,3-dinitrobenzene	mg/kg	36.9	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
2-nitrotoluene	mg/kg	18.4	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	0.078
3-nitrobenzene	mg/kg	36.9	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
4-nitrobenzene	mg/kg	198	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
nitrobenzene	mg/kg	43.2	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
HMX	mg/kg	22500	--	--	--	--	--	--	--	ND	ND
PETN	mg/kg	737	--	--	--	--	--	--	--	ND	ND
RDX	mg/kg	48.6	--	--	--	--	--	--	--	ND	ND
Tetryl	mg/kg	911	--	--	--	--	--	--	--	ND	ND
nitroglycerin	mg/kg	36.9	--	--	--	--	--	--	--	0.21	0.031
2,4-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	0.65	0.055
2,6-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	0.064	ND
2,3-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
2,5-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
3,4-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
3,5-dinitrotoluene	mg/kg	7.03	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
2,4,6-trinitro-3-xylene	mg/kg	124	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,2-dimethyl-3,4-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,2-dimethyl-3,5-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,2-dimethyl-3,6-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,2-dimethyl-4,5-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,3-dimethyl-2,4-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,3-dimethyl-2,5-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,4-dimethyl-2,3-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,4-dimethyl-2,5-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,4-dimethyl-2,6-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,5-dimethyl-2,3-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND
1,5-dimethyl-2,4-dinitrobenzene	mg/kg	111	<0.2	<0.21	<0.21	<0.2	<0.22	<0.21	<0.21	ND	ND

Notes:

¹: Maximum concentration of on-site samples included on this table

²: Maximum concentration of WisDOT soil/sediment samples per results submitted to WDNR on 7/16/18 by WisDOT

2001 results are from QES-DEN using lab method 8321

2015 results are from ECCS using lab method 8270

mg/kg: milligrams per kilogram

BAR RCL: Site Specific Recreational Residual Contaminant Level for direct contact

ND: Not detected

Attachment

**COVID-19 Related Project Impacts letter
dated February 6, 2020**



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April 23, 2020

Mr. Phil E. Richard
Hydrogeologist
Wisconsin Department of Natural Resources
Park Falls Service Center
875 4th Avenue South
Park Falls, WI 54554-1130

**RE: COVID-19 Related Project Impacts
Former DuPont Barksdale Works
72315 State Highway 13
Town of Barksdale, Bayfield County, Wisconsin
FID No.: 804009140
EPA ID No.: WIR000133447
BRRTS No. 02-04-00156**

Dear Mr. Richard:

I appreciate you and Chris Saari taking the time on Friday, April 17, 2020 to discuss work The Chemours Company FC, LLC's (Chemours) will undertake at the Former DuPont Barksdale Works (site) during the 2020 field season. As we discussed, Chemours plans to continue to focus on high priorities at the site in 2020, which will include:

- Ongoing investigation of former manufacturing areas, including identification and removal of residual solid product;
- Sampling surface water/sediment at the site perimeter;
- Maintaining existing biopilot test cells;
- Holding a public meeting;
- Requesting modification of the existing hazardous remediation variance (HWRV) to allow a soil heating pilot;
- Fulfilling reporting commitments associated with site investigation and hazardous remediation variance (HWRV) work; and,
- Fulfilling obligations associated with the WisDOT soil relocation project.

Unfortunately, Chemours is experiencing several COVID-19 related impacts that will prevent completion of some of our previously planned work at the site this field season. This work includes:

- **Soil Heating Field Pilot Testing:** Based on successful benchtop testing and thermal modeling in late 2019 and early 2020, Chemours was planning to conduct a field pilot to test the scalability of soil heating as a means to reduce larger pieces of residual solid product (RSP) in soil to a size that could be treated using the current alkaline hydrolysis techniques that have been successful elsewhere on the site (see attached HWRV Modification Request letter from Chemours to WDNR dated February 6, 2020). Addressing larger pieces of RSP is an integral part of the design of the final site remedy. Ongoing COVID-19 related delays will not allow Chemours enough time this summer to adequately complete design, construction, and initial testing of the heating field pilot in what is an already short field season in northern Wisconsin.



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- **Final Placement of WisDOT Soil:** Soil to be imported from the WisDOT Boyd Creek Bridge replacement project was going to be used as final cover in a former sulfur storage area in 2020. However, COVID-19 related delays are affecting identification of wetlands by WDNR staff (see attached requests submitted on March 17, 2020 and further information below), field surveying, the development and design of a grading plan, and completion of an Interim Action Plan as requested by WDNR. The delays will mean that WDNR approval of the requested Interim Action Plan will not occur prior the start of the WisDOT Boyd Creek Bridge project, which is currently targeted for mid-May 2020.

We are requesting the following regulatory flexibility to accommodate these disruptions:

- **WDNR extension of existing HWRV permit:** An extension of the HWRV permit from May 18, 2022 to May 18, 2023 will allow additional time to refine a full site remedial approach. The design of the remedial approach has been impacted due to the delay of the soil heating pilot testing that was planned from 2020 to 2021.
- **WDNR approval to stockpile WisDOT soil onsite until 2021:** The soil to be imported and placed on the site has concentrations of site-related constituents that are generally consistent with those found in soil in the proposed placement area. The concentrations found in the soil to be imported are also below screening criteria that are protective of human health for direct contact. Current Wisconsin regulations include standards for the management of contaminated soil. To allow for the stockpiling of WisDOT soil onsite until 2021, we are requesting an exemption from:
 - The requirement to provide an Interim Action Plan/Soil Management Plan prior to receiving and stockpiling WisDOT soil. An Interim Action Plan will be developed and submitted prior to the final placement of the WisDOT soil.
 - The requirements for storage of contaminated soil as specified in NR 718.05, which includes storage duration and stockpiling cover/anchor requirements. The soil is proposed to be stockpiled in the same general area as where it will be spread for final placement.
 - The requirement that that soil be placed more than 100 feet from wetlands. Wetland identification requests were submitted to the WDNR in March 2020 for the proposed soil placement area. Travis Holte from the WDNR indicated that there may be potential delays with the identification requests due to COVID-19 related impacts. WDNR wetland maps do not show known wetlands in proposed stockpile locations; however, wetlands are mapped within 100 feet. The proposed soil placement location is located in a former production area and if any wetlands were found in the area, they would likely be considered artificial.



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If you have any questions or comments, please feel free to contact me by telephone at (812) 923-1136 or by email at Bradley.S.Nave@chemours.com.

Sincerely,

A handwritten signature in blue ink that reads 'Bradley S. Nave'.

Bradley S. Nave
Chemours Corporate Remediation Group

Attachments: Hazardous Waste Remediation Variance Modification Request letter dated February 6, 2020
Wetland Identification Requests dated March 17, 2020

Cc: Chris Saari, WDNR
Cary Pooler, AECOM
Eric Schmidt, AECOM