



April 22, 2019

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Submitted Electronically

Subject: Request for concurrence to discontinue groundwater monitoring and abandon site monitoring wells
Schmalz Dump Superfund Site CERCLA ID# WID980820096

Dear Ms. Nguyen:

The purpose of this letter is to request EPA concurrence to discontinue groundwater monitoring at the Schmalz Dump Superfund site, in Harrison, WI. Monitoring has been performed since 1993, following completion of the remedial action. The groundwater monitoring wells will be abandoned in accordance with Wis. Adm. Code NR 141 after concurrence is received.

History

Groundwater sampling was required in the 1985 and 1987 Record of Decision (RODs) due to potential leaching of lead and chromium (trivalent, hexavalent not found) into groundwater based on soil samples analyzed during the remedial investigation. According to the 1987 ROD, leachable concentration ranged from 0.071 to 0.146 mg/l for lead and from 0.011 to 0.63 mg/l for chromium. These levels were not expected to cause contamination in the groundwater to exceed drinking water standards.

The 1987 Phase II report analyzed filtered and unfiltered groundwater samples and concluded that most lead and chromium was found in suspended solids and removed by filtration to levels below the MCL. Groundwater monitoring wells GW-9 and GW-9A, located approximately eight feet apart, were anomalies in this regard and results for chromium were 1130 and 286 ug/l in the filtered samples. These wells were located close to but outside the Schmalz Dump and determined to be impacted from another unidentified source. Similar chromium concentrations were not observed in several nearby contaminant investigations overseen by the DNR. It is thought by the DNR that localized elevated chromium concentrations may be due to suspended solids.

The 1987 ROD called for one year of quarterly monitoring to provide a baseline followed by 4 annual groundwater sampling events. Due to several scheduling errors, the sampling program did not follow this schedule. The fifth five-year review (FYR) signed in 2013 noted that the 4 annual groundwater sampling rounds had been completed to fulfill the requirements of the ROD.

A 1991 Addendum to the FYR provided additional discussion on Risk Assessment Screening and did not recommend additional monitoring wells due to chromium (III) being the sole contaminant of concern. Annual groundwater monitoring was recommended and sixteen (16) groundwater sampling events took place between 1993 and 2017.

Groundwater Results

Fifteen (15) groundwater sampling events for RCRA metals have been performed at the six (6) site monitoring wells since their installation in 1993 with ten (10) events performed by the DNR. Chromium (total) has exceeded the Wis. Admin. Code § NR140.10 Public Health Groundwater Quality Enforcement Standard (ES) in monitoring well MW-5 since installation. The Wis. Admin. Code § NR140.10 Groundwater Quality Preventive Action Limit (PAL) has been exceeded for chromium in MW-2 and MW-4 and barium in MW-5 in most sampling events. Lead was not observed above method detection limits in any groundwater sample. Groundwater result tables are attached.

Discussion

- Contamination above the ES for total chromium is limited to the only onsite well MW-5.
- Chromium further downgradient in wells MW-2, MW-3 and MW-4 has not exceeded the ES.
- Contaminant trends appear stable in all monitoring wells. There is no indication of a threat to receptors and the area is supplied by municipal water.
- The groundwater monitoring data were reviewed by the Northeast Region Remediation and Redevelopment Program Closure Committee on November 1, 2018. The Closure Committee concurred that sufficient groundwater sampling had been performed to allow for case closure under Wis. Admin. Code § NR 726 with a continuing obligation for residual groundwater contamination. The residual groundwater contamination meets the closure requirements of Wis. Adm. Code § NR 726.05 (6) (a) 1., (b) and (c). Discontinuation of groundwater monitoring and monitoring well abandonment per Wis. Adm. Code ch. NR 141 were recommended.

Recommendations

1. Discontinue groundwater monitoring. Based on residual groundwater contamination above the Admin. Code § NR140.10 Public Health Groundwater Quality Enforcement Standard in monitoring well MW-5 for chromium, the site will be added to the DNR database per Wis. Adm. Code § NR 726.07. A Continuing Obligation for groundwater, consistent with Wis. Adm. Code § NR 726.15 (2) (a) serves as an Institutional Control as discussed in Section V of the September 2018 Explanation of Significant Difference (ESD). DNR approval would be required prior to well construction, consistent with Wis. Adm. Code § NR 812.09 (4) (w).
2. Abandon groundwater monitoring wells. The wells are in poor condition and will need to have extensive repair or be replaced for future monitoring. Monitoring well abandonment will also remove the need to have this as a Continuing Obligation as discussed in Section V of the ESD.

If you have questions regarding this letter, please contact me at Judy.Fassbender@wisconsin.gov or by phone at (608)-266-7278.

Sincerely,


Judy Fassbender
Chief, Policy and Technical Resources Section
Remediation and Redevelopment Program

Attachment: Schmalz Dump Superfund Site – Groundwater Data Table

Cc: Kevin McKnight – NER (kevin.mcknight@wisconsin.gov)