



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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MAY 22 2017

DNR - WCR

REPLY TO THE ATTENTION OF
SR-6J

May 19, 2017

Mr. Derrick Paul
Risk Manager
National Presto Industries, Inc.
3925 North Hastings Way
Eau Claire, WI 54703

Re: Remediation of Cadmium in Groundwater Using MNA
National Presto Industries, Inc. Superfund Site, Eau Claire, Wisconsin

Dear Derrick:

The United States Environmental Protection Agency (EPA) and the Wisconsin Department of Natural Resources (WDNR) have reviewed the two reports that National Presto Industries (NPI) submitted to the Agencies concerning the dissolved cadmium levels that occur in groundwater at the NPI Superfund site. Your first report, "Compilation and Analysis of Cadmium Soil and Groundwater Data" (June 23, 2015), contains four remedial alternatives that NPI developed to address cadmium at the site. These alternatives include 1) continue the ongoing Monitored Natural Attenuation (MNA) of groundwater, 2) stabilization using the surficial application of limestone apatite, 3) *in situ* treatment of cadmium-impacted soil with MAECTITE and 4) *ex situ* treatment of cadmium-impacted soil with MAECTITE. In this report, NPI had proposed to implement Alternative 1; continue the ongoing MNA of groundwater.

After reviewing the above report, EPA and WDNR requested that NPI supply additional lines of evidence to demonstrate that MNA was a viable remedial alternative to address the cadmium in the groundwater. NPI provided these additional lines of evidence in a second report, "Multiple Lines of Evidence for RNA/MNA of Cadmium in Groundwater" (December 19, 2016).

Upon review of both reports, EPA and WDNR are satisfied that NPI has submitted enough lines of evidence to support MNA as a viable remedy for the cadmium at the NPI site. Therefore, I am prepared to recommend to my management that a Proposed Plan for a ROD Amendment be issued that sets forth MNA of cadmium in groundwater as EPA's preferred remedy. To further support this action, however, EPA requests that NPI perform groundwater modelling to predict future cadmium concentrations in downgradient wells MW-68B, MW-70B, and MW-75 and to develop an appropriate

contingency remedy for this area by December 31, 2017 should the cadmium values remain above target cleanup levels in the future.

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Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (312) 353-9685 or by email at caine.howard@epa.gov.

RD Sincerely,



Howard Caine
Remedial Project Manager

cc: Cliff Wright, Gannett Fleming
Mae Willkom, WDNR
Eaton Weiler, U.S. EPA (C-14J)