



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

December 13, 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:

This letter updates my letter from May 19, 2017 based on additional information provided by NPI and its consultant Gannett Fleming.

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. EPA requests that NPI continue to monitor the groundwater for Cd. NPI should observe any trends in vertical downgradient wells MW-68B, MW-70B, and MW-75 based on historical data. EPA recognizes from the *Annual Interim Remedial Action Status Report for 2016* that Cd exceeded the Enforcement Standard in wells MW-10A and MW-34A only. EPA will require an MNA evaluation report in the future for the site and the due date will be established in the upcoming ROD Amendment.

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](mailto:caine.howard@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Howard A. Caine". The signature is fluid and cursive, with a long horizontal stroke at the end.

Howard Caine  
Remedial Project Manager

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