

Willkom, Mae - DNR

From: Wright, Clifford C. <cwright@GFNET.com>
Sent: Friday, January 18, 2019 3:04 PM
To: 'dpaul@gopresto.com'
Cc: Willkom, Mae - DNR; caine.howard@epa.gov; Kugle, Dennis F.
Subject: FW: NPI Lagoon 1 and East Extension

Importance: High

Derrick- Mae Willkom asked me to forward the following "no further action" email, as you and I recently discussed.

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From: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Sent: Friday, January 18, 2019 2:15 PM
To: dpaul@presto.com
Cc: Wright, Clifford C. <cwright@GFNET.com>; Howard Caine (caine.howard@epa.gov) <caine.howard@epa.gov>
Subject: FW: NPI Lagoon 1 and East Extension
Importance: High

The purpose of this email is to document compliance with DNR requests contained in a March 4, 2011, email (below) regarding the Lagoon 1 area of the National Presto Industries (NPI) site. The 2011 email was sent in response to submittal of an October 14, 2010 Request for "No Further Remedial Action" Determination for Soils at Former Lagoon #1, including the East Extension, by Gannett Fleming on behalf of NPI. On December 15, 2010, the request was presented to the Department of Natural Resources (DNR) West Central Region Case Closure Committee.

Between 1966 and 1980, Lagoon #1 was used as a settling pond for waste forge compound and was eventually expanded to include the East Extension. Beginning in 1993, liquid wastes and certain solids were recovered from Lagoon 1, blended with spent solvents, and shipped off-site to be burned in cement kilns. After confirmation soil sampling and soil gas sampling, additional solids were recovered, mixed with soils, and stockpiled near the Melby Road Disposal Site. Additional confirmation soil samples and soil gas samples were collected, and during 1997 and 1998, 5 SVE wells were installed and operated. After soil gas sampling confirmed the remedial system's effectiveness, the system was abandoned and the lagoon was reportedly backfilled. Also in 1998, soils were excavated in the area of the East Extension and were placed under the engineered cap at the Melby Road Disposal Area. In addition, approximately 15 drums were excavated from an area northeast of the east end of the East Extension. Later that year, the initial excavation was extended into an area along the East Extension's west wall. Confirmation sampling was conducted, and the additional excavated soil and drums were properly disposed of at an off-site landfill.

The 2010 request for a "No Further Remedial Action" determination stated that "Lagoon #1 at one time extended further south and covered about five acres" and that in 1981, this "south half" of Lagoon #1 was backfilled with sand at DNR's request. The report described 11 probe hole locations within the south half of Lagoon #1 which were sampled to define the extent of residual waste forge compound remaining in the backfilled area. However, information was retrieved from WDNR files which showed that only visual observations of residual waste forge compound were recorded at that time and that no lab analysis was conducted. Therefore, the Department required further characterization of surficial soils in the south half of Lagoon #1 for the purpose of assessing direct contact risk. On July 12, 2011, and in accordance with an approved work plan, Gannett Fleming used a power auger to advance 12 soil borings in the south half of Lagoon #1 to a depth of 4 feet. None of the cuttings from the 12 borings contained visual evidence of waste

forge compound. Composite samples were collected from each of five borings for laboratory analysis of VOCs, cadmium, and PAHs. One sample, SB-F, exceeded the generic non-industrial RCL for direct contact with benzo(a)pyrene. Therefore, the Department will require a continuing obligation for maintenance of industrial zoning in this area.

Groundwater monitoring for dissolved cadmium, shown to be associated with waste forge compound in Lagoon #1 soils, has been periodically conducted in downgradient monitoring well nests (i.e. MW-10A,B and MW-34A,B) since 1987. Wisconsin enforcement standard exceedances have been and continue to be measured in both well nests. Therefore, DNR requested that sampling for dissolved cadmium be conducted in additional downgradient monitoring wells. NPI complied with that request and subsequently submitted two reports: a June 23, 2015 "Compilation and Analysis of Cadmium Soil and Groundwater Data;" and a December 19, 2016 "Multiple Lines of Evidence for RNA/MNA of Cadmium in Groundwater." Upon review of both reports, U.S. EPA Remedial Project Manager, Howard Caine, issued a December 13, 2017 letter stating that, "EPA and DNR are satisfied that NPI has submitted enough lines of evidence to support MNA as a viable remedy for the cadmium at the NPI site."

Based on the additional work and data that was provided, if the USEPA were to determine that no further remedial action is necessary in the identified areas, then the State would concur.

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Mae E. Willkom

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From: Willkom, Mae - DNR
Sent: Friday, March 4, 2011 1:29 PM
To: 'Olig, David J.' <dolig@GFNET.com>
Cc: 'Caine.Howard@epamail.epa.gov' <Caine.Howard@epamail.epa.gov>
Subject: NPI Lagoon 1

I have reviewed your Request for "No Further Remedial Action" Determination for Soils at Former Lagoon #1, Including the East Extension, submitted to the WDNR by Gannett Fleming on behalf of NPI. The report is dated October 14, 2010. On December 15, 2010, I presented the work to the Department of Natural Resources West Central Region Case Closure Committee.

It is my understanding that between 1966 and 1980, Lagoon #1 was used as a settling pond for waste forge compound and was eventually expanded to include the East Extension. Water from Lagoon #1 was pumped to Lagoon #2, which functioned as a seepage cell. Beginning in 1993, 1,100,000 gallons of liquid wastes and 5,000 cubic yards of solids were recovered from Lagoon 1, blended with spent solvents, and shipped off-site to be burned in cement kilns. Confirmation soil samples and soil gas samples were collected, after which an additional 9,800 cubic yards of solids were recovered, mixed with soils, and stockpiled near the Melby Road Disposal Site. Additional confirmation soil samples and soil gas samples were collected, and during 1997 and 1998, 5 SVE wells were installed and operated, removing approximately 200 pounds of VOCs. Soil gas sampling was again conducted to confirm the effectiveness of the remedial system, and the system was abandoned. The lagoon was reportedly backfilled with ten feet of clean soil from berms surrounding former Lagoons 2, 3, and 4. (WDNR and U.S. EPA have previously concurred that no further remedial action is necessary in site soils at Lagoon #2. According to a September, 1994, Final Remedial Investigation Report, Lagoons 3 and 4 were eliminated from further investigation based on field screening results, visual characterizations, and limited historical use.)

Also in 1998, soils were excavated in the area of the East Extension and were placed under the engineered cap at the Melby Road Disposal Area. In addition, approximately 15 drums were excavated from an area northeast of the east end of the East Extension. Later that year, the initial excavation was extended into an area along the East Extension's west

wall. Confirmation sampling was conducted, and the additional excavated soil and drums were properly disposed of at Seven Mile Creek Landfill. No specific information as to the backfilling of the East Extension, including the west wall and the drum recovery area, was made available. Please provide this information.

Your report stated that "Lagoon #1 at one time extended further south and covered about five acres" and that in 1981, this "south half" of Lagoon #1 was backfilled with sand at WDNR's request. The report further stated that in 1988, 11 locations ("probe holes A thru K") within the south half of Lagoon #1 were sampled to define the extent of residual waste forge compound remaining in the backfilled area. The report concluded that, "Minor amounts of waste forge compound were observed in only three of the borings (probe holes C, E, and J)," and that "Based on this information, no further action was required in this area of former Lagoon #1." Consequently, the report did not further address the south half of Lagoon #1.

As we discussed by phone some time ago, information was retrieved from WDNR files which records the results of the probe hole survey cited in your report. According to this information, solid stem augers were used to drill to a depth of at least 15 feet in each of the probes. However, it appears that only visual observations of residual waste forge compound were recorded at that time and that no lab analysis was conducted. Visual observations showed forge compound mixed with soil from 0-6 feet below ground surface (bgs) in one location and from 5 to 12 feet bgs in others. More recently, the likely presence of waste forge compound in soils south of Lagoon #1 was also indicated by elevated levels of 1,1,1-TCA measured in direct-push borings completed in November of 2002.

Efforts were made to locate any correspondence from WDNR and EPA files that would document the agencies' agreement not to require any further action in the south half of Lagoon #1. Those efforts were unsuccessful, and discussions were held with Department personnel involved with NPI in the late 1980s. Those discussions indicated that implementation of the Superfund program was just beginning at that time, and that it is very unlikely WDNR would have had the authority to agree not to require future action in any specific area of the site. Therefore, the Department requires further characterization of surficial soils in the south half of Lagoon #1 for the purpose of assessing direct contact risk.

Groundwater monitoring for dissolved cadmium, shown to be associated with waste forge compound in Lagoon #1 soils, has been periodically conducted in downgradient monitoring well nests (i.e. MW-10A,B and MW-34A,B) since 1987. ES exceedances have been and continue to be measured in both well nests, and an increasing trend has recently been observed in MW-34A. Monitoring well nest MW-70A,B, located slightly downgradient of well nest MW-34A,B in 1992, does not appear to have ever been sampled for dissolved cadmium. Therefore, the Department requests that sampling for dissolved cadmium be conducted in monitoring well nest MW-70A,B, in lieu of continued cadmium monitoring in well nest MW-11A,B, where only occasional, low-level detections of cadmium have ever been measured.

Upon completion of additional work, I would provide the Department's response to NPI/GF's request in a manner similar to the "no further action" e-mails from previous DNR project managers, indicating that if the USEPA determines that no further remedial action is necessary in site soils in the identified areas, then the State would concur.

 *Mae E. Willkom*

Hydrogeologist

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