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February 11, 2019

File #34283.000

Mr. Howard Caine – SR-6J
Remedial Project Manager
Waste Management Division
USEPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Groundwater Analytical Results for Perfluoroalkyl Substances Analysis
National Presto Industries, Inc., Eau Claire, Wisconsin
USEPA CERCLIS ID WID006196174
WDNR BRRTS 02-09-000267 and FID 609038320

Dear Howard:

On behalf of National Presto Industries, Inc. (NPI), Gannett Fleming, Inc. (GF) is submitting this letter report summarizing groundwater (GW) analytical results for perfluoroalkyl substances (PFAS) at the NPI site in Eau Claire, Wisconsin. Collection of GW samples for PFAS analysis was performed at the request of the United States Environmental Protection Agency (USEPA). The analytical results document that former Lagoon #1 is not a source area of PFAS.

Pertinent Background Information

Based on historical data for trichloroethylene (TCE) and cadmium (Cd), NPI collected GW samples from select on-site wells immediately downgradient of former Lagoon #1 that have contained elevated concentrations of TCE and Cd in the past. Specifically, NPI collected two rounds of GW samples from MW-10A (Cd), MW-34A (TCE and Cd), and MW-70A (TCE and Cd) for PFAS analysis, as shown on Figure 1.

Given that PFAS are an emerging contaminant, protocols for GW sampling, etc. are still under development. Consequently, the samples were collected using special-order high-density polyethylene (HDPE) HydraSleeves™ samplers (since passive diffusion sampler bags are not compatible with PFAS) and HDPE containers with unlined plastic screw caps, but without Trizma preservative. Note that polypropylene bottles and Trizma preservative are routinely used

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when drinking water (DW) samples are collected for PFAS analysis. Trizma is added for buffering and free chlorine removal and applicable to DW samples only.

According to records available to Derrick Paul (NPI), he confirms that NPI has not manufactured appliances with non-stick coatings at their current location in Eau Claire. Please see GF's May 2018 agency-approved work plan for additional background information, etc.

PFAS Sampling Description and Analytical Results

In August and December 2018, NPI and GF collected GW samples for PFAS analysis from MW-10A, MW-34A, and MW-70A. The samples were collected using HDPE HydraSleeves™ and agency-approved protocols and QA/QC, as described in the previous section.

The samples were shipped on ice, overnight to Pace Analytical Services (Wisconsin Certification #405132750) in Green Bay, Wisconsin. Pace Green Bay, in turn, shipped them to their lab in Minneapolis, Minnesota (Wisconsin Certification #999407970), where Pace used EPA Method 537 Modified (for GW) to analyze the samples for PFAS.

Table 1 summarizes the dissolved-phase analytical results in nanograms per liter (ng/ℓ) or parts per trillion (ppt) for 21 PFAS compounds. As summarized in Table 1:

- Lab results document that none of the samples had levels of PFAS above the limits of detection (ranging from 0.25 to 1.90 ng/ℓ).
- Select non-detect concentrations were qualified as estimated “J” during data validation because:
 - Surrogate d5-EtFOSAA recovered low in sample MW-34A collected on 08/14/18. Consequently, all compounds in the sample were qualified as estimated.
 - Internal standard areas for 13C3_PFPPrOPrA recovered below the lower limits in sample MW-70A collected on 08/14/18. Consequently, two compounds were qualified as estimated.
- Perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) are 2 of the 21 PFAS analytes. The USEPA has established a health advisory limit for PFOA and PFOS in DW of 70 ng/ℓ for each compound individually or the combined concentrations of both.

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No federal maximum contaminant levels have been established for PFAS concentrations in GW.

- Duplicate samples were collected at MW-10A on 12/10/18. Hence, a total of seven samples were analyzed for PFAS.

Attachment A notes that a CD with copies of the laboratory reports and chain of custody records, QA/QC packages, and data validation for the PFAS samples collected in August and December 2018 is available upon request.

Summary and Conclusion

Dissolved-phase analytical results document that PFAS were not present above the limits of detection (ranging from 0.25 to 1.90 ng/l) in any of the seven samples collected in August and December 2018 from three water-table wells located near former Lagoon #1. Based on these results, we conclude that additional sampling for PFAS analysis is not warranted.

Please let us know if you concur with our conclusion and contact me if you have any questions or need additional information.

Sincerely,

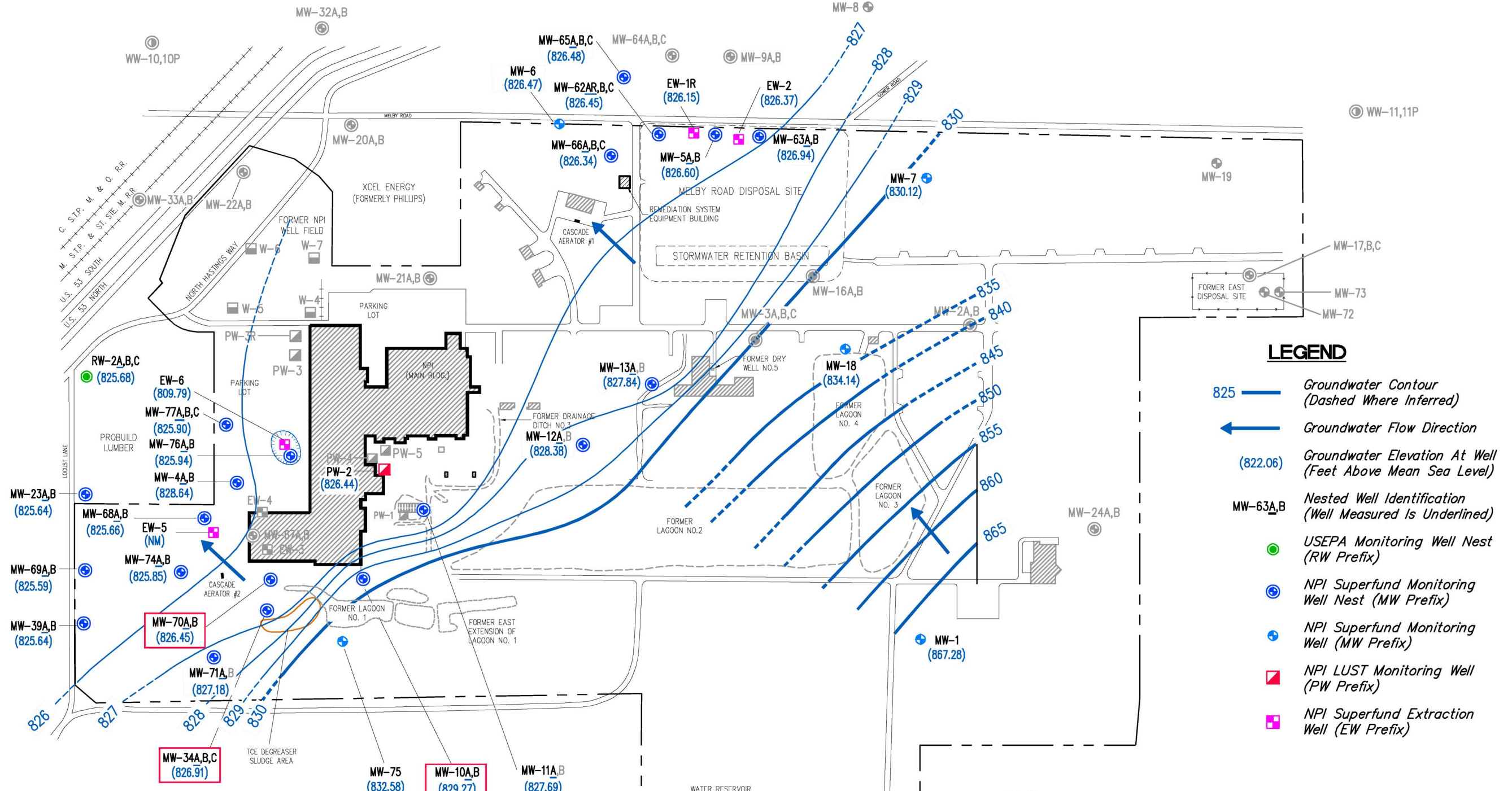
GANNETT FLEMING, INC.



Clifford C. Wright, P.E., P.G.
Project Engineer

CCW/jec/Enc.

ecc: Mae Willkom (WDNR/Eau Claire)
Derrick Paul (NPI)
Dennis Kugle (Gannett Fleming)

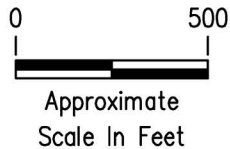


LEGEND

- 825 — Groundwater Contour (Dashed Where Inferred)
- ← Groundwater Flow Direction
- (822.06) Groundwater Elevation At Well (Feet Above Mean Sea Level)
- MW-63A,B Nested Well Identification (Well Measured Is Underlined)
- USEPA Monitoring Well Nest (RW Prefix)
- ⊕ NPI Superfund Monitoring Well Nest (MW Prefix)
- ⊕ NPI Superfund Monitoring Well (MW Prefix)
- ▣ NPI LUST Monitoring Well (PW Prefix)
- ⊕ NPI Superfund Extraction Well (EW Prefix)

NOTES:

1. Groundwater Elevations Measured In Wells While EW-6 Was Pumping, And The Data From MW-4A Was Not Used To Develop The Contour Map.
2. Contours Above 830 Are Shown At 5-Foot Intervals And Contours Below 830 Are Shown At 1-Foot Intervals, Except As Shown Around EW-6.
3. Shaded Wells Have Been Abandoned And Shaded Buildings Have Been Removed.
4. EW-3 Was Replaced By EW-5 On January 7, 2004, And EW-4 Was Replaced By EW-6 On September 22, 2011.



**SITE PLAN SHOWING
JUNE 2018 GROUNDWATER CONTOURS
AND THE THREE GROUNDWATER
MONITORING WELL LOCATIONS
SAMPLED FOR PFAS ANALYSIS
(MW-10A, MW-34A, & MW-70A)**

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EAU CLAIRE, WISCONSIN

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EAU CLAIRE, WISCONSIN

TABLE 1

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS FOR PERFLUOROALKYL SUBSTANCES (AUG & DEC 2018)

Substance	Groundwater Analytical Data Summary								USEPA Health Advisory Level ⁽²⁾ (ng/l)
	Sample Date	08/14/18			12/10/18				
	Well ID Results	MW-10A (ng/l)	MW-34A (ng/l) RQ	MW-70A (ng/l) RQ	MW-10A (ng/l)	10A Dup ⁽¹⁾ (ng/l)	MW-34A (ng/l)	MW-70A (ng/l)	
PFBA		<0.75	<0.70 J	<0.72	<0.74	<1.1	<0.88	<0.74	NHAL
PFPeA		<0.40	<0.37 J	<0.39	<0.39	<0.58	<0.47	<0.40	NHAL
PFBS		<0.27	<0.25 J	<0.26	<0.27	<0.39	<0.32	<0.27	NHAL
PFHxA		<0.28	<0.26 J	<0.27	<0.27	<0.40	<0.33	<0.27	NHAL
PFPrOPrA		<0.74	<0.69 J	<0.71 J	<0.73	<1.1	<0.87	<0.73	NHAL
PFHpA		<0.64	<0.60 J	<0.62	<0.63	<0.92	<0.76	<0.63	NHAL
NaDONA		<0.66	<0.61 J	<0.64 J	<0.65	<0.95	<0.78	<0.65	NHAL
PFHxS		<0.67	<0.62 J	<0.64	<0.66	<0.96	<0.78	<0.66	NHAL
PFOA		<0.46	<0.43 J	<0.44	<0.45	<0.66	<0.54	<0.45	70
PFOS		<0.64	<0.60 J	<0.62	<0.63	<0.92	<0.76	<0.63	70
PFOA & PFOS combined		<1.10	<1.03 J	<1.06	<1.08	<1.58	<1.30	<1.08	70
PFNA		<0.52	<0.48 J	<0.50	<0.51	<0.75	<0.61	<0.51	NHAL
PFDA		<0.50	<0.46 J	<0.48	<0.49	<0.72	<0.59	<0.49	NHAL
PFUdA		<0.48	<0.44 J	<0.46	<0.47	<0.68	<0.56	<0.47	NHAL
N-MeFOSAA		<1.3	<1.2 J	<1.3	<1.3	<1.9	<1.5	<1.3	NHAL
N-EtFOSAA		<1.1	<1.1 J	<1.1	<1.1	<1.6	<1.3	<1.1	NHAL
PFDS		<0.38	<0.35 J	<0.37	<0.37	<0.54	<0.45	<0.37	NHAL
PFDoA		<0.41	<0.38 J	<0.39	<0.40	<0.58	<0.48	<0.40	NHAL
PFTrDA		<0.38	<0.35 J	<0.37	<0.37	<0.54	<0.45	<0.37	NHAL
PFTeDA		<0.36	<0.34 J	<0.35	<0.36	<0.52	<0.43	<0.36	NHAL
PFHxDA		<0.44	<0.40 J	<0.42	<0.43	<0.62	<0.51	<0.43	NHAL
PFODA		<0.74	<0.69 J	<0.71	<0.73	<1.1	<0.87	<0.73	NHAL

NOTES:

Concentrations are in nanograms per liter (ng/l).

All concentrations were non-detect, and no concentrations were at or above the USEPA health advisory level of 70 ng/l.

J = Estimated concentration below laboratory quantitation level.

NHAL = No health advisory level established.

PFOA = Perfluorooctanoic acid.

PFOS = Perfluorooctanesulfonic acid.

RQ = Results qualifier.

FOOTNOTES:

(1) 10A Dup = MW-10A duplicate sample result.

(2) USEPA health advisory levels are for drinking water and are shown in bold, red font.

ATTACHMENT A – THE FOLLOWING IS AVAILABLE UPON REQUEST

**CD WITH COPIES OF LABORATORY REPORTS AND CHAIN- OF-CUSTODY RECORDS,
QA/QC PACKAGES, AND DATA VALIDATION FOR SAMPLES COLLECTED IN
AUGUST AND DECEMBER 2016**