

Willkom, Mae - DNR

From: Caine, Howard <caine.howard@epa.gov>
Sent: Friday, February 15, 2019 11:37 AM
To: Wright, Clifford C.
Cc: Willkom, Mae - DNR
Subject: RE: NPI Update and Questions for You 2/14/19

Hi, Cliff. I wanted to get back to you before I leave on vacation. I will on vacation February 19 thru March 1 returning to the office the week of March. I'm leaving the office early today.

Mae and I are in agreement with the proposals below.

We can further, if necessary, after I get to the office.

Thanks...Howard

From: Wright, Clifford C. <cwright@GFNET.com>
Sent: Thursday, February 14, 2019 4:26 PM
To: Caine, Howard <caine.howard@epa.gov>
Subject: NPI Update and Questions for You 2/14/19

Howard- On Monday, Feb 11, Joyce Conway with GF emailed you NPI groundwater analytical results for PFAS and monthly progress reports for Jan 2019. In addition:

1. Gannett Fleming, Inc. (GF) is working on the NPI annual report for 2018. In the 2018 annual report, NPI may propose to:
 - a. Change the sampling frequency at the ECMWF from quarterly to semi-annual, as we discussed during the annual meeting in Nov 2018. Do you agree?
 - b. Abandon three monitoring wells (MW-39A, MW-69B, MW-71A) that you asked NPI to leave in place pending the PFAS sampling results (see your 3/29/18 email below). Do you agree?
2. The agencies are reviewing NPI's Oct 2018 remedial action report (RAR). Table 4 to the Oct 2018 RAR provides a long-term stewardship (LTS) plan summary for the NPI site. However, since the RAR and LTS plan are not yet approved by the EPA, the 2018 annual will not include the LTS plan certification statements, etc. Do you agree?

Please call me to discuss. I left you a voicemail recently about this too.

Cliff Wright, PE, PG | Project Engineer/Geologist
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From: Caine, Howard <caine.howard@epa.gov>
Sent: Thursday, March 29, 2018 4:05 PM
To: Wright, Clifford C. <cwright@GFNET.com>
Cc: Mae Willkom <mae.willkom@wisconsin.gov>; Derrick Paul <dpaul@gopresto.com>
Subject: Annual Interim Remedial Action Report: Follow-up

Cliff, I wanted to follow-up on our call from the other week regarding the sampling request in the Annual Interim Action Report. Mae and I spoke about the request and we agreed that:

Well Abandonment

| Well No. | Plume | Location | EPA View |
|----------|-------|----------|----------|
|----------|-------|----------|----------|

| | | | |
|----------|-----|-----------|-------------------------|
| MW-39A | 1/2 | Fenceline | Keep for potential PFAS |
| MW-47A/B | 1/2 | Off-site | Abandon |
| MW-57A/B | 1/2 | Off-site | Abandon |
| MW-60A/B | 1/2 | Off-site | Abandon |
| MW-69B | 1/2 | Fenceline | Keep for potential PFAS |
| MW-71A | 1/2 | On-site | Keep for potential PFAS |
| | | | |
| MW-8 | 3/4 | Off-site | Abandon |
| MW-9A/B | 3/4 | Off-site | Abandon |
| MW-22A/B | 3/4 | On-site | Abandon |
| MW-26A/B | 3/4 | Off-site | Abandon |
| MW-27A/B | 3/4 | Off-site | Abandon |
| MW-29A/B | 3/4 | Off-site | Abandon |

Once PFAS sampling is completed and it can be demonstrated that PFAS is not an issue, we can revisit MW-39A, MW-69B and MW-71A and determine if they should be abandoned.

Stop sampling CW-11, CW-16 and CW17 because downgradient of CW-15, CW-19, CW-22 and CW-23. **EPA agrees.**

Stop sampling EC-5. **EPA agrees.**

Stop sampling EW-1R, EW-2 and EW-5. **EPA agrees.**

Stop sampling EW-6 for Cd. **EPA agrees.**

In Plume 1/2, stop sampling 11 wells/piezometers and reduce sampling of 17 wells/piezometers to annual. **EPA agrees.**

a. SWC wells/piezometers MW-34A, MW-68A/B, MW-70A, MW-76A and MW-77 A/B quarterly. **EPA agrees.**

b. RW-3A/B/C semi-annually. **EPA agrees.**

In Plume 3/4, stop sampling 12 well/piezometers and reduce sampling of wells/piezometers to annual. **EPA agrees.**

Stop sampling MW-4A for Cd analysis. Reduce sampling frequency of six Cd well/piezometers to annual. Quarterly sampling of MW-10A will continue. **EPA agrees except for MW-34A. This shall remain at semi-annual for Cd.**

Let me know if you wish to discuss further.

Thanks...Howard
Howard Caine
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Superfund Division
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