

Willkom, Mae - DNR

From: Willkom, Mae - DNR
Sent: Thursday, May 2, 2019 3:59 PM
To: 'Wright, Clifford C.'
Subject: RE: NPI Remedial Action Report versus Closure Request Level of Detail 4/2/19

Cliff,

This is a follow-up email to document my response to your previous inquiry (below) regarding the level of detail required in revisions to NPI's draft Remedial Action Report of October, 2018. After discussion among members of the WCR Closure Committee, it was agreed that not all requirements applicable to a standard closure report are necessarily applicable to this situation, given that final site closure is not being requested. Considering the number of areas of the site which the RAR will document and the volume of data available, please consider the following guidelines when determining a logical level of detail for this report:

- As much as possible, the RAR should document residual soil contamination by incorporating readily-available maps and tables from previously-submitted reports, rather than re-tabulating existing data.
- The purpose of proposing continuing obligations (COs) for soil is to alert future prospective purchasers and/or property owners to areas where any residual soil contamination over an NR 720 RCL is known to exist (including soil-to-groundwater pathway RCLs and/or contamination below four feet), so that all soil contamination may be handled properly if and when it is ever encountered.
- COs for residual groundwater contamination are defined by any exceedance of an NR 140 enforcement standard.

Please let me know, if you have additional questions or concerns as you finalize your revisions to this report. Thanks.

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Mae E. Willkom

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From: Wright, Clifford C. <cwright@GFNET.com>
Sent: Tuesday, April 2, 2019 10:35 AM
To: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Subject: NPI Remedial Action Report versus Closure Request Level of Detail 4/2/19

Mae- You're currently reviewing NPI's Oct 2018 remedial action report (RAR). Based on your feedback and the most recent sample results, GF is revising the NPI RAR to summarize those areas with:

- Residual soil contamination at or above a generic NR 720 residual contaminant level (RCL) for the residential (i.e., non-industrial) direct contact pathway.
- Residual groundwater contamination at or above an NR 140 enforcement standard (ES).

As we discussed Tue morning, Apr 2, you're checking to see if NPI's Oct 2018 RAR needs to be revised to include the same level of detail provided in a closure request (CR).

- Specifically, if the RAR should summarize all residual soil contamination at or above generic NR 720 soil to groundwater pathway RCLs, too.
- **Likewise, please decide if the RAR needs to be revised to summarize all residual groundwater contamination at or above an NR 140 preventative action limit like a CR. Unless I'm mistaken, neither one of the two example RARs that you shared with me included that level of detail.**

The two possible revisions would greatly expand the level of detail in the RAR. **Consequently, GF and NPI request that the WDNR allow use of the NR 720 direct contact RCL and NR 140 ES thresholds instead.** Feel free to call me to discuss. However, I'm typically unavailable by phone 11:45-13:15 on Tue and Thu thru Apr 12. I left you a voicemail recently about this too.