

Willkom, Mae - DNR

From: Wright, Clifford C. <cwright@GFNET.com>
Sent: Thursday, August 29, 2019 1:03 PM
To: Caine, Howard
Cc: Willkom, Mae - DNR
Subject: RE: NPI: Well Abandonment/Sampling Schedule

Howard-

Thanks again for the following email, as we discussed on Mon/Aug 5. Please see red text below for an answer to your question regarding EC-1 and feel free to contact me to review further, if necessary. I left you a voicemail recently about this too.

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From: Caine, Howard <caine.howard@epa.gov>
Sent: Friday, August 2, 2019 3:45 PM
To: Wright, Clifford C. <cwright@GFNET.com>
Cc: 'Mae Willkom' <mae.willkom@wisconsin.gov>
Subject: NPI: Well Abandonment/Sampling Schedule

Cliff, Mae and I have discussed NPI's request and below is our response.

NPI requests agency approval to abandon the following monitoring wells/piezometers in 2019.

- In former Plume 1/2: MW-39A, MW-69B, and MW-71A.
- In former Plume 3/4: MW-5B, MW-62C, MW-63B, and MW-66C.

EPA/WDNR agree that MW-39A and MW-71A can be abandoned. We believe that the rest of the wells should be retained.

1. Reduce sampling frequency for NPI VOC analysis from quarterly to semi-annual at EC-1, MW-4B, MW-34A, MW-68A/B, and MW-77A/B (all Plume 1/2 wells or piezometers) based on the relatively low levels of TCE and long-term decreasing trends. In addition, there is enough quarterly data to document that concentrations do not fluctuate seasonally.

EPA/WDNR believes that annual sampling of EC-1 was already approved in 2018. Is NPI proposing semi-annual sampling?

NPI plans to sample EC-1 annually as approved by the agencies in 2018. Last year, NPI continued to sample EC-1 quarterly due to a snafu on my part and I apologize for the mistake/oversight.

MW-4B, MW-34A and MW-68A/B can be changed from quarterly to semi-annual. MW-77A/B should remain quarterly.

2. Reduce sampling frequency for cadmium (Cd) analysis from annual to none at MW-4B, MW-34C, MW-68A, and MW-70A. Cd concentrations in these wells/piezometers were below detection limits in 2017/2018 and historically have ranged from non-detect to J values well below its 5.0 micrograms per liter ($\mu\text{g}/\ell$) ES/MCL. The two exceptions are

Cd concentrations of 13.1 µg/ℓ in MW-70A on October 11, 2011, and 2.0 µg/ℓ (below the 5.0 µg/ℓ ES/MCL but not J flagged) in MW-4B on March 4, 1993.

EPA/WDNR agree that MW-4B can be dropped provided sampling remains at MW-68B. We also agree that NPI can drop sampling MW-34C, MW-68A and MW-70A.

Let me know if you wish to discuss further.

Thanks...Howard

Howard Caine
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