

June 14, 2021 File #34283.000

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

Re: NPI Monthly Progress Reports for May 2021 USEPA CERCLIS ID WID006196174 WDNR BRRTS 02-09-000267 and FID 609038320

Dear Shelia:

In accordance with the requirements of the Administrative Order for Remedial Action between National Presto Industries, Inc. (NPI) and the United States Environmental Protection Agency (USEPA), effective July 16, 1992, and the Unilateral Order between NPI, the USEPA, and National Defense Corporation, effective October 21, 1993, Progress Reports Nos. 347 and 296, respectively, for the NPI site in Eau Claire, Wisconsin, follow. Paper submittals are no longer required by either the USEPA or the Wisconsin Department of Natural Resources (WDNR), until further notice.

Please call if you have any questions or need additional information about either report.

Sincerely,

GANNETT FLEMING, INC.

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

CCW/jec/Enc.

ecc: Candace Sykora (WDNR/Baldwin) Derrick Paul (NPI) Chelsea Payne (Gannett Fleming)

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INTERIM REMEDIAL ACTION ON-SITE GROUNDWATER PROGRESS REPORT NO. 347 MAY 2021 NATIONAL PRESTO INDUSTRIES, INC. SITE EAU CLAIRE, WISCONSIN

This progress report is prepared and submitted in accordance with the reporting requirements contained in the Administrative Order for Remedial Action between National Presto Industries, Inc. (NPI) and the United States Environmental Protection Agency (USEPA), effective July 16, 1992.

During May 2021, a total of approximately 8.1 million gallons of groundwater was pumped from Southwest Corner extraction well EW-6, treated by cascade aeration, and then discharged to the Chippewa River via the city storm sewer. Water was pumped continuously from EW-6 all month at an approximate average flow rate of 180 gallons per minute. Southwest Corner extraction well EW-5 remained shut down.

Extraction well EW-6 and the effluent from cascade aeration are sampled quarterly. A discharge monitoring report (DMR) with analytical results for the first quarter of 2021 was submitted to the Wisconsin Department of Natural Resources and USEPA on April 14, 2021. The next DMR with the second quarter analytical results for 2021 will be submitted in July 2021.

Gannett Fleming

REMEDIAL DESIGN/REMEDIAL ACTION MELBY ROAD DISPOSAL SITE SOIL VAPOR EXTRACTION SYSTEM PROGRESS REPORT NO. 296 MAY 2021 NATIONAL PRESTO INDUSTRIES, INC. SITE EAU CLAIRE, WISCONSIN

This progress report is prepared and submitted in accordance with the reporting requirements summarized in Section XI - Order, Paragraph 58 - Progress Reports of the Unilateral Order between National Presto Industries, Inc. (NPI), National Defense Corporation, and the United States Environmental Protection Agency (USEPA), effective October 21, 1993.

On December 2, 2020, the soil vapor extraction (SVE) system at the Melby Road Disposal Site (MRDS) was turned off for its fifth seasonal 6-month shutdown period, as approved by the USEPA. However, the system operated for 145.4 hours between March 10 and 16, 2021, with one vacuum blower running in low-flow mode for quarterly sampling. To minimize condensate production during cold weather operation, a variable frequency drive (VFD) unit was used to reduce the extraction flow rate from 570 to <230 actual cubic feet per minute (acfm).

On May 21, 2021, low-flow operation of the SVE system resumed. On May 25, the VFD was adjusted for normal-flow operation. Data collected between May 21 and 31 show that the blower ran at average flow rates of 220 and 570 acfm and manifold vacuums were <1 inch of water column (inch wc) and steady at 6-inch wc under low and normal flow conditions, respectively, when operating. Additional monitoring performed on May 25, just before the flow rate was increased from 220 to 570 acfm, included:

- Field screening the 12 vent wells (VW-1 through VW-12) and SVE exhaust gas with a flameionization detector for volatile organic compounds (VOCs) and methane.
- Sampling the SVE exhaust gas for laboratory analysis of trichloroethylene (TCE); 1,1,1-trichloroethane (TCA); tetrachloroethylene; and 1,1-dichloroethane.

As anticipated, there was a measurable increase in overall VOC concentrations from December 2020 through May 2021. However, vapor-phase TCE and TCA concentrations remained more than two orders of magnitude <u>below</u> calculated thresholds corresponding to the federal maximum contaminant level and NR 140 enforcement standard for both VOCs in groundwater, as summarized in Gannett Fleming's August 2020 *Updated Operation and Maintenance Plan for the MRDS Cap and SVE System* report. No issues related to the trial seasonal shutdown of the MRDS SVE system were observed. NPI will notify the USEPA and Wisconsin Department of Natural Resources if vapor-phase TCE/TCA concentrations rebound enough to trigger a contingency. More detail will be provided in the 2021 annual report that will be submitted to both agencies by April 15, 2022. Copies of the May 2021 laboratory analytical results and field data sheets are available upon request.