

**SIXTH FIVE-YEAR REVIEW REPORT FOR
NATIONAL PRESTO INDUSTRIES, INC. SUPERFUND SITE
CHIPPEWA COUNTY, WISCONSIN**



Prepared by

**U.S. Environmental Protection Agency
Region 5
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LIST OF ABBREVIATIONS & ACRONYMS

1,1-DCA	1,1-dichloroethane
1,1-DCE	1,1-dichloroethylene
AOC	Administrative Order on Consent
ARAR	Applicable or Relevant and Appropriate Requirement
AWS	Alternate Water System
Cd	Cadmium
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
ECMWF	Eau Claire Municipal Well Field
EDS	East Disposal Site
EPA	United States Environmental Protection Agency
ES	Enforcement Standard
ESD	Explanation of Significant Differences
FS	Feasibility Study
FYR	Five-Year Review
ICs	Institutional Controls
LTS	Long-Term Stewardship
MCLs	Maximum Contaminant Levels
MNA	Monitored Natural Attenuation
MRDS	Melby Road Disposal Site
NDC	National Defense Corporation
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPI	National Presto Industries
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
PAHs	Polycyclic Aromatic Hydrocarbons
PAPI	Presto Absorbent Products Inc.
PCE	Tetrachloroethene or Perchloroethylene
PFAS	Perfluoroalkyl and Polyfluoroalkyl Substances
PRP	Potentially Responsible Party
QAPP	Quality Assurance Project Plan
QA/QC	Quality Assurance / Quality Control
RAOs	Remedial Action Objectives
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
Site	National Presto Industries, Inc. Superfund Site
SVE	Soil Vapor Extraction
SVOC	Semi-volatile Organic Compound
TCA	Trichloroethane
TCE	Trichloroethene
UU/UE	Unlimited Use and Unrestricted Exposure
VOC	Volatile Organic Compound

WAC
WDNR

Wisconsin Administrative Code
Wisconsin Department of Natural Resources

I. INTRODUCTION

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The United States Environmental Protection Agency (EPA) is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Section 300.430(f)(4)(ii)) and considering EPA policy.

This is the sixth FYR for the National Presto Industries (NPI), Inc. Superfund Site (Site). The triggering action for this statutory review is the completion date of the previous FYR dated July 19, 2017. The FYR has been prepared due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of three operable units (OU), and all will be addressed in this FYR. OU1 consists of an interim action of groundwater pump and treat systems at NPI. OU2 consists of constructing an Alternate Water System (AWS) to address contaminated drinking water north of the NPI site. OU3 is the final site-wide remedy which addresses the Melby Road Disposal Site (MRDS) and includes the cap and soil vapor extraction (SVE) system remedy.

The National Presto Industries, Inc. Superfund Site FYR was led by Glenn Lautenbach, EPA Remedial Project Manager (RPM). Participants included Candace Sykora with the Wisconsin Department of Natural Resources (WDNR). The relevant entities such as the PRP were notified of the initiation of the FYR. The review began on 7/19/2021.

Site Background

The Site is located at 3925 North Hastings Way in Eau Claire, Wisconsin. The property lies within the city of Eau Claire, except for a 9-acre parcel on the eastern part of the Site that is located in the village of Lake Hallie and a 4-acre parcel in the southern part of the Site that is located in the town of Seymour. Most of the 320-acre NPI property is situated in Chippewa County with a small portion located along the northern border of Eau Claire County. The village of Lake Hallie (formerly the unincorporated town of Hallie) (Lake Hallie) is located north and east of the NPI property, while the city of Eau Claire (Eau Claire) is located south and west of the Site. The land use for the Site is industrial and it is not reasonably anticipated to change in the future. The land use for the areas surrounding the Site is industrial to the north, forested to the east, and residential to the south and west. There are no reasonably anticipated land use changes to the surrounding areas.

Prior to its purchase by the United States Government War Department in 1942, the NPI site was owned by nine individuals and was predominantly farmland with isolated areas of woodland. The major waste stream at the Site was waste forge compound. Wastewater containing the waste forge material was discharged to areas on the Site including dry wells and seepage lagoons. In 1981, during routine water supply sampling, the Eau Claire Municipal Well Field (ECMWF) was found to have volatile organic compound (VOC) contamination in some of the production wells in the north part of the well field. EPA

conducted investigations beginning in 1984, of the groundwater contamination (Plumes 1-2) at the ECMWF site¹ and found that it was originating from the former manufacturing area at the NPI site. During the remedial investigation (RI) at the NPI site it was determined that NPI was the source of contamination at the ECMWF. Plumes 3-4 and 5 were later discovered at the NPI site. Plumes 3-4 originated at the MRDS, and Plume 5 originated at the East Disposal Site (EDS). The NPI site was proposed as a National Priorities List (NPL) site on October 15, 1984, and formally listed on the NPL on June 10, 1986. The Site Chronology is attached as Appendix B. Figures illustrating the Site and surrounding area are included in Appendix C.

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION		
Site Name: National Presto Industries, Inc.		
EPA ID: WID 006 196 174		
Region: 5	State: WI	City/County: Eau Claire / Chippewa
SITE STATUS		
NPL Status: Final		
Multiple OUs? Yes	Has the site achieved construction completion? Yes	
REVIEW STATUS		
Lead agency: EPA <i>[If "Other Federal Agency", enter Agency name]:</i>		
Author name (Federal or State Project Manager): Glenn Lautenbach		
Author affiliation: EPA		
Review period: 7/19/2021 - 3/11/2022		
Date of site inspection: 5/3/2022		
Type of review: Statutory		
Review number: 6		
Triggering action date: 7/19/2017		
Due date (five years after triggering action date): 7/19/2022		

¹EPA placed the ECMWF site on the NPL in September 1984. Also, in 1984 EPA conducted a focused RI to determine the source and extent of the groundwater contamination at the ECMWF site.

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

Waste forge compound, soil/forging compound mix, other wastes, and soil containing contaminants of concern were found at the following source areas on the NPI site property: Lagoon No. 1, the MRDS, the EDS, Drainage ditch 3, and Dry wells 2 and 5. Areas mentioned are illustrated in the figures in Appendix C.

The RI investigated samples in the following Site media: soil, groundwater, surface water, sediments, sludge, and waste material. VOCs were detected in soil, waste material, surface water and groundwater. Semi-volatile organic compounds (SVOCs) were detected in the waste forge material. Metals were detected in soil, waste material and groundwater. Although a number of chemical compounds have been detected in soil and groundwater at the NPI site, the main contaminants of concern are:

Table 1: Main Contaminants of Concern

Contaminants of Concern (Groundwater):
1,1-Dichloroethane (1,1-DCA)
1,1-Dichloroethene (1,1-DCE)
Tetrachloroethene (PCE)
1,1,1-Trichloroethane (1,1,1-TCA)
Trichloroethene (TCE)
Cadmium (Cd)

Of these, TCE is the primary contaminant of concern.

The final RI included a Baseline Risk Assessment that was conducted to characterize the current and potential threats to human health and the environment at the Site. Exposure scenarios which were evaluated include current off-site residents (adult and child), future on-site residents (adult and child), current off-site recreational use (adult and child) and current on-site worker. Exposure pathways evaluated included ingestion and inhalation of soils and groundwater, dermal absorption of soils, surface water and groundwater, and ingestion of recreationally caught fish (Eder, 1994).

The primary risks at the NPI site relate to potential for the continued contamination of groundwater. To provide for the long-term protection and cleanup of the groundwater, EPA stated in the 1996 Record of Decision (ROD) (EPA, 1996) that source areas at the Site must be contained or eliminated in order to facilitate the long-term cleanup of the aquifer.

Response Actions

OU1 Interim Action, Plume containment at MRDS & SW Corner:

In September 1991, EPA issued a ROD for OU1 for contaminated groundwater on the NPI site that selected an interim action consisting of a groundwater pump and treat remedy (EPA, 1991). The remedial objective of this interim action was to prevent the off-site movement of contaminants at plumes 1, 2, and 3. The selected remedy included installation of groundwater extraction wells (two each

in the Southwest Corner of the Site and the MRDS) and treatment of the extracted water by two independent cascade aeration units, with discharge of the treated groundwater via the Eau Claire storm sewer system to the Chippewa River, and long-term monitoring to measure the performance of the groundwater extraction system. WDNR concurred with the selected remedy.

OU2 – Public Water Supply & Annexation/ hookup to Eau Claire Municipal Water Supply:

On August 1, 1990, EPA issued a ROD for OU2 that provided for an AWS to residents in Lake Hallie and Eau Claire that had private wells that were impacted or potentially impacted by contaminated groundwater from the NPI site (EPA, 1990). The remedial action objective of this operable unit is the implementation of a permanent replacement water supply for the affected area to protect human health by eliminating exposure via ingestion, dermal contact, and inhalation to contaminated groundwater. The ROD called for construction of a community water supply for the impacted area in Lake Hallie and for the extension of the Eau Claire municipal water supply to properties that were annexed to the city. The ROD required the abandonment of all existing private wells within the affected area that are finished in the contaminated aquifer and for annual monitoring of designated private wells that are located outside of the affected area that are still used as a drinking water supply to ensure continued quality of drinking water.

Source Control Measures Implemented Prior to Issuance of OU3 ROD:

On October 14, 1993, EPA, National Defense Corporation (NDC) and NPI entered into an Administrative Order on Consent (AOC) for the performance of time-critical, on-site removal activities (EPA, 1993). This AOC, subsequently modified on November 4, 1994 (EPA, 1994), provided for (1) time-critical excavation of the waste forge compound from Lagoon No. 1 and the EDS, and (2) use of waste material as a supplemental fuel at a cement kiln approved under CERCLA. Non-time-critical components of the removal action included characterization, evaluation, design, and remediation of soils and soil gas, if any, remaining in Lagoon No.1 after the excavation was complete. Removal of the wastes began in 1993, and almost all the waste forge compound materials had been excavated from Lagoon No. 1 and the EDS by the end of 1995.

OU3 – Waste Removal from Source Areas, SVE & Cap at MRDS, and Long-term Groundwater Monitoring:

The final site-wide remedy was identified in the May 15, 1996, ROD for OU3 (EPA, 1996). In addition to those response actions previously completed and currently underway at the NPI site, EPA determined that the following additional measures should be implemented to fully address all threats to human health and the environment posed by contamination at the site:

- MRDS and EDS: Installation of an SVE system at the MRDS. Removal of identified concentrated wastes, if any, at the MRDS. A soil gas monitoring program will be implemented to monitor the effectiveness of the SVE system. Excavation and consolidation of EDS wastes with MRDS wastes and installation of a multi-layer cap compliant with Wisconsin Administrative Code (WAC) Chapter NR 660 (now NR 664, Subchapter N) over the combined wastes at the MRDS. The ROD also stated that EPA would seek deed restrictions limiting land use in the future development of the capped area.
- Drainage Ditch #3: Removal of soils contaminated with waste forge compound and their consolidation with wastes at the MRDS.

- Dry Wells #2 and #5: Removal of contaminated soils with off-site landfill disposal.
- Plume 1-2: Continued operation of the two-column air stripper at the leading edge of the groundwater contaminant plume (at the ECMWF site), continued operation of the NPI site (Southwest Corner) pump-and-treat system to prevent the off-site migration of contaminated groundwater, and long-term groundwater monitoring of Plumes 1-2.
- Plume 3-4: Continued operation of the MRDS groundwater pump-and-treat system to prevent the off-site migration of contaminated groundwater, long-term groundwater monitoring of Plumes 3-4, and surface water sampling in Lake Hallie.
- Plume 5: Long-term groundwater monitoring of Plume 5 and surface water sampling in Lake Hallie.

The remedial action objectives for this operable unit include:

- The objective of the SVE system is to prevent future releases of VOCs into the groundwater.
- The objective of the waste consolidation, off-site disposal and multi-layer cap is to eliminate exposure to contaminated soil and prevent migration of contaminants into the groundwater.
- The objective of the groundwater monitoring is to ensure the effectiveness of the chosen groundwater remedies.

The final site-wide 1996 ROD for the NPI site further addressed contamination in the groundwater contaminant plumes (1-2) traveling from the NPI site to the ECMWF site and serves as EPA’s final remedy regarding these plumes. It also provided for long-term operation, maintenance, and repair of the ECMWF air stripper and the installation and operation of on-site groundwater extraction wells at the MRDS and Southwest Corner downgradient of Lagoon No. 1 and Drainage Ditch #3.

In December 2009, EPA issued an Explanation of Significant Differences (ESD) to describe a difference from the groundwater cleanup goals originally selected in the 1996 ROD (EPA, 2009). The cleanup goals for the site groundwater contaminants are the WAC Ch. NR 140 Enforcement Standards (ESs) included in the 2009 ESD. The ESs are equivalent to the federal maximum contaminant levels (MCLs) with the exception of 1,1-Dichloroethane which does not have an MCL. The 2009 ESD noted these standards should be used to monitor and determine compliance with groundwater quality at the NPI site.

Table 2: Cleanup Levels for Contaminants of Concern in Groundwater

Compound:	Remedial Goal/Cleanup Level:
1,1-Dichloroethane (1,1-DCA)	850 ug/L
1,1-Dichloroethene (1,1-DCE)	7 ug/L
Tetrachloroethene (PCE)	5 ug/L
1,1,1-Trichloroethane (1,1,1-TCA)	200 ug/L
Trichloroethene (TCE)	5 ug/L
Cadmium (Cd)	5 ug/L

The ROD for OU3 sets the Site soil cleanup standards as the Wisconsin Administrative Code NR 720. These requirements apply to the soils remaining at ditch #3 and the EDS after the excavation and consolidation at the MRDS.

Status of Implementation

OU1:

The design of the OU1 remedy, intended to prevent movement of contaminated groundwater from the MRDS and southwest portion of the NPI property, was prepared by NPI and consisted of two extraction wells in the southwest corner of the property. The design was approved by EPA with modification in June 1992. WDNR issued a WAS Chapter 30 permit to extend Eau Claire's sewer outfall into the main channel of the Chippewa River. WDNR issued concentration limits for the discharge, and construction of the interim action for groundwater began in late 1993 and was completed in March 1994. Pumping of the groundwater extraction wells began in March 1994.

Extraction wells EW-1 and EW-2 are located in the MRDS. EW-1 was replaced by EW-1R in September 1995. The two wells were shut down as part of a trial in 2010. In 2012, a long-term shutdown of the wells was approved. These two extraction wells have been shut down throughout this review period.

Extraction wells EW-3 and EW-4 were located in the southwest corner. EW-3 was turned off in 2003 due to its pump failing. Well EW-5 was installed and began operating in 2004 to replace EW-3. EW-4 and the cascade aerator associated with these extraction wells (Cascade Aerator #2) was shut-down due to an expansion to the NPI building in 2010. A replacement cascade aerator and EW-6 were installed to replace them in 2010 and 2011 respectively. EW-5 was shut down in 2015 and remains offline. EW-6 is still active besides trial shutdown periods which occurred between January - April 2017 and September 2021- January 2022. The remedy for OU1 is still ongoing.

OU2:

Design of the OU2 remedy began in September 1990 and was approved by EPA on February 27, 1991. Extension of city water supplies was initiated in July 1991. Eau Claire's portion of the AWS became operational in November 1991. Construction of the Hallie Sanitary District system began in April 1991, and in 1992, the Hallie Sanitary District was formed to operate the new water supply system. This remedial action is completed.

OU3:

NPI removed both pumpable (about 1.1 million gallon) and non-pumpable (about 5,000 cubic yards) waste forge compounds from Lagoon No. 1 between late 1993 and late 1995 and sent the wastes to a CERCLA-approved cement kiln for use as secondary fuel. Approximately 9,800 cubic yards of soil and forge compound were incorporated under the cap at the MRDS. The SVE system was subsequently installed in Lagoon No. 1 prior to backfilling and operated from September 1997 to August 1998. In September 1998, EPA approved the abandonment of the SVE wells and the backfilling of Lagoon No. 1. Waste forge compound and contaminated soils at the EDS and in Drainage Ditch #3 have been excavated and incorporated, along with the Lagoon No. 1 waste described above, under the cap at the MRDS. Contaminated soils from Dry Wells #2 and #5 have been excavated and disposed of at a licensed sanitary landfill. The Lagoon No. 1 excavation and SVE activities occurred during the summer of 1998. The Preliminary Close-Out Report (EPA, 1999) stated that confirmation sampling indicates that areas of soil clean-up have been adequately addressed. In addition, the SVE system was installed

beneath the cap at the MRDS to remove contaminated soil gas. Routine sampling of the SVE exhaust gas is done to monitor the performance of the system.

NPI also conducted several other removal actions of material contaminated with waste forge compound, although they were not specifically required by the 1996 ROD. Excavated areas include the east extension of former Lagoon No. 1, about 7,000 square feet from an area west of former Lagoon No. 1 in the southwest property corner, a swale between former Lagoon No. 3 and No. 4 in 1998, the southwest corner of former Lagoon No. 2 in 2000, and in 2001 the loading dock area at the south end of NPI's main building. All the material from the east extension of Lagoon No. 1, 60 cubic yards of stockpiled material from the MRDS, 60 cubic yards from the former Lagoon No. 3/4 swale area, 3,000 cubic yards from the southwest corner of former Lagoon No. 2, and 1,900 cubic yards from the loading dock area were disposed of off-site at licensed sanitary landfills. The loading dock area contains an area with soils that exceeded the non-industrial standards. These soils were capped and has Wisconsin Continuing Obligations as ICs with restrictions that pertain to this area. A decision document has not yet been created to document all these necessary actions as part of the site remedy. This has been identified as an issue and recommendation of this FYR.

The MRDS cap was constructed as designed in accordance with WAC Ch. NR 660 (now NR 664 Subchapter N) in 1998. The amount of waste that was consolidated at the MRDS was more than anticipated and the extent of the capped area was expanded to the east by approximately 20 percent. The finished capped area was 9.92 acres. ICs were required at the MRDS, which is discussed in further detail in the Institutional Controls section of this FYR.

A SVE system (M-34/70 TCE Degreaser Sludge Area SVE) was constructed in 2003 to address a TCE source area identified in 2002 in the southwest corner of the Site. This system runs seasonally and is shut-down during the winter months due to the system containing above-ground piping. In 2015, a SVE system (Main Building SVE) was brought online located under the Site's main building. This SVE system was constructed to remove vapor phase TCE from a suspected source underneath the building. This system runs throughout the year. These SVE systems are illustrated on the figure in Appendix C. A decision document has not yet been created to document these necessary actions as part of the site remedy. This has been identified as an issue and recommendation of the FYR.

Groundwater monitoring for plumes 1-2, 3-4 and 5 were identified as components of the remedy of OU3. Surface water and private well monitoring for plumes 3-4 and 5 was identified and has been conducted as part of the remedy of OU2 and OU3. Surface water and private well monitoring was not completed during this review period. Groundwater monitoring is still being conducted on the Site. Discussion of the groundwater, surface water and private well sampling is discussed in the Data Review section.

There is an area of the Site where Cd concentrations in groundwater still exceed the MCLs and ESs. The 2012 FYR (EPA, 2012) identified the Cd exceedances in groundwater as an issue and recommended development of a work plan to investigate and then clean up the Cd in the groundwater. NPI submitted a report detailing the compilation of Cd in soil and groundwater samples to the agencies in 2015 (Gannett Fleming, 2015). In 2016, NPI submitted a report "Multiple Lines of Evidence for RNA/MNA of Cadmium in Groundwater" (Gannett Fleming, 2016) in which NPI presented monitored natural attenuation (MNA) as a viable option for addressing Cd-contaminated groundwater at the Site. EPA is currently reviewing MNA as a remedy to address the Cd in groundwater. A decision document will need

to be completed to document a change in remedy for the Cd in groundwater. This has been identified as an issue and recommendation of the FYR. The remedy for OU3 is ongoing.

Institutional Controls

Table 3 below summarizes the ICs that have been implemented for the Site.

Table 3: Summary of Planned and/or Implemented ICs

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
NPI Company Property-MRDS	Yes	Yes	MRDS	To prevent activity that would compromise the integrity of the remedy. Prevent residential use of the property. Prohibit use of groundwater.	Restrictive Covenant recorded at Chippewa County Recorder’s office on October 25, 2011.
Non-NPI Company Property-Remedy Components: Air Stripper on ECMWF	Yes	No	ECMWF	To prevent human consumption of contaminated groundwater until groundwater cleanup goals are achieved.	Eau Claire ordinance restricting private wells where municipal water is available and preventing cross connections is in place and effective (Local Ordinances 14.08.115 and 14.04.100, enacted 1984 latest revision 2015 and enacted 2008 respectively).
Groundwater – Plumes 1-2	Yes	No	Plumes 1-2	To prevent human consumption of contaminated groundwater until groundwater cleanup goals are achieved.	Placement of future supply wells by the village subject to WAS Ch. NR811 which prohibits wells in proximity to contaminated groundwater. Eau Claire ordinance restricting private wells where

					<p>municipal water is available and preventing cross connections is in place and effective (Local Ordinances 14.08.115 and 14.04.100, enacted 1984 latest revision 2015 and enacted 2008 respectively).</p>
<p>Groundwater – Plumes 3-4 and 5</p>	<p>Yes</p>	<p>No</p>	<p>Plumes 3-4 and 5</p>	<p>To prevent human consumption of contaminated groundwater until groundwater cleanup goals are achieved.</p>	<p>Lake Hallie ordinances restricting private wells (Local Ordinance 4.3.02 (8)) and prevents cross connections between private wells and municipal water supply (Local Ordinance 4.3.02 (13) are in place and effective (Enacted 1992).</p> <p>Placement of future public supply wells by the village subject to WAS Ch. NR811 which prohibits wells in proximity to contaminated groundwater.</p> <p>Eau Claire ordinance restricting private wells where municipal water is available and preventing cross connections is in place and effective (Local Ordinances</p>

					14.08.115 and 14.04.100, enacted 1984 latest revision 2015 and enacted 2008 respectively).
Loading dock area cap, associated soils, and active remediation systems	Yes	No	NPI Site	To prevent activity that would compromise integrity of the remedy.	Wisconsin Continuing Obligations, enforceable under section 292.12 of the Wisconsin Statutes, completed, and listed in the WDNR Database. 12/2019

The RODs for OU1 and OU2 do not explicitly call for ICs. The OU3 ROD states that EPA will pursue a deed restriction on the MRDS cap area to prevent activities damaging to the cap. An Environmental Protection Access Agreement and Declaration of Restrictive Covenants document was made on September 29, 2011 and recorded at the Chippewa County Register of Deeds on October 25, 2011.

Other ICs to prevent exposure to contaminated groundwater or interference with the groundwater remedies have been developed and implemented. The OU2 ROD allowed the use of private wells in the affected area as long as the well was used for non-human consumption and was subject to restrictions from the Village of Hallie or City of Eau Claire. The Township of Lake Hallie has an ordinance in place that prohibits the installation of new private wells and has a permit program of those residents who had wells prior to the creation of the water utility and seek to use such wells for non-potable purposes. The city of Eau Claire has an ordinance in place that prevents cross connections between private wells and the municipal water supply and allows a five-year timeframe for the use of a supply well once the residence has hooked up to the municipal water.

ICs in the form of Wisconsin Continuing Obligations were placed on the Site in December 2019. Continuing obligations are legal requirements designed to protect public health and the environment in regard to contamination that remains on a property, similar to ICs. The Continuing Obligations placed on this Site include, but are not limited to, maintaining the cap at the loading dock area, the approved soil cleanup levels being suitable for industrial use and proper management of contaminated soils if excavated.

Status of Access Restrictions and ICs: ICs and land use restrictions as required by the OU3 ROD are in place with local ordinances and a Restrictive Covenant at the MRDS. These ICs are reviewed and monitored in accordance with the 2019 Long-Term Stewardship (LTS) Plan (2019, Gannett Fleming).

Current Compliance: There are currently no known uses of the Site which would be considered inconsistent with the objectives to be achieved by the ICs. A fence is in place to restrict access. The LTS checklist is completed every year by the PRP and reported as part of the annual report.

IC Follow up Actions Needed: Currently, the ROD for OU3 only calls for ICs for the MRDS. There were several additional areas of the Site identified after the OU3 ROD was created that require ICs. An ESD is required to document the inclusion of all areas that require ICs as part of the remedy and not just the MRDS, including the areas mentioned earlier and for the extent of the groundwater contamination.

Long-Term Stewardship: Since compliance with ICs is necessary to ensure the protectiveness of the remedy, planning for LTS is required to help ensure that the ICs are maintained, monitored, and enforced so that the remedy continues to function as intended. A LTS Plan was approved by EPA and WDNR and was implemented by NPI in 2019 in the 2019 Remedial Action Report. An update is given as part of the annual report which demonstrates that the Site was inspected to ensure no inconsistent uses with ICs have occurred, to certify that ICs remain in place and are effective and to document that any necessary contingency actions have been executed.

Systems Operations/Operation & Maintenance

OU1: Interim Action, Plume Contaminant at MRDS & Southwest Corner

OU1 includes the interim actions to address groundwater through extraction wells located at the MRDS and southwest corner. Extraction wells EW-1R and EW-2 are located in the MRDS, they were offline throughout the review period. Sampling of the two extraction wells was stopped in 2018.

Extraction wells EW-5 and EW-6 are located in the southwest corner. EW-5 was offline during the review period, sampling of EW-5 was stopped in 2018. EW-6 entered a trial shutdown in January 2017 and was restarted in April 2017 after a rebound of TCE in groundwater. NPI attempted a second trial shutdown for EW-6 which began in September 2021 and was restarted in January 2022 due to a rebound of TCE in groundwater. Discharge monitoring reports are submitted quarterly and annually to the WDNR and EPA.

OU2: Hallie Public Water Supply/ Hookup to Eau Claire Municipal Water Supply

OU2 included the creation of an alternative water system which was completed in the 1990's. There are no systems operations or O&M related to OU2. Private well sampling was last conducted in 2003, a groundwater monitoring plan approved by EPA removed the sampling of private wells due to sample results being below standards in the previous four rounds (Gannett Fleming, 2003).

OU3: Waste Removal from Source Areas, SVE & Cap at MRDS, and Long-Term Groundwater Monitoring

NPI prepared an Operations and Maintenance (O&M) Plan (Gannett Fleming, 2020) for the MRDS cap and SVE system. The O&M Plan discusses the operation and monitoring requirements for both the cap and the SVE system and the quality assurance/ quality control (QA/QC) procedures that follow. The plan describes how routine maintenance by NPI is to be conducted following manufacturers' recommended schedules and the sampling and analytical requirements. Monitoring activities occurring at the cap include monthly inspection of the cap and perimeter ditches and maintenance of the cap vegetation as needed.

The SVE at the MRDS has been conducting shutdowns between December and June for the last five years. The shutdowns were conducted as yearly trials from 2016 to 2019. In 2019, EPA approved

continual seasonal shutdowns. The shutdowns have been approved, due to the decreased levels of VOCs in the soil vapor and difficulties in operating the system in winter. During operation, the blower is shut down once a month to drain condensate from the system. SVE emissions are tested quarterly, and operations are reported monthly to EPA and WDNR. Emission rates are orders of magnitude lower than the 5.7 lb./hr. emission limit defined in WAC Ch. NR 406.04(2).

A groundwater monitoring program was also developed and has evolved over time as contaminant concentrations declined and new sampling equipment and techniques became available for use. The monitoring program currently consists of quarterly sampling and analysis of extraction well EW-6; manhole MH-18; and the groundwater monitoring wells. However, if EW-6 is not operating, then EW-6 and MH-18 are not sampled. Sampling frequencies for the groundwater monitoring wells range from quarterly to biennial, based upon the historic concentration of contaminants in a given well. The analytes for the wells and MH-18 are either a select list of five VOCs (DCA, DCE, PCE, TCA, and TCE) and/or Cd. In addition, starting in 2018, MH-18 is being sampled for the priority pollutants which includes pH, hardness, metals, Site VOCs, and PAHs every five years until discharges of the pump-and-treat groundwater from NPI to the Chippewa River cease. Discharge monitoring reports are submitted quarterly and annually to WDNR and EPA. The groundwater monitoring data is discussed in Data Review. The current groundwater monitoring program including sampled analytes and frequencies is listed in the “Annual Interim Remedial Action Status Report – 2021” (Gannett Fleming, 2022) for the Site.

Well Abandonment:

During the review period there have been multiple well abandonment events which took place at the Site. The abandoned wells include:

Table 4: Well Abandonments

Well Id:	Date:	Well Id:	Date:
MW-9A	04/2018	MW-47A	05/2018
MW-9B	04/2018	MW-47B	05/2018
MW-8	05/2018	MW-39A	11/2019
MW-22A	05/2018	MW-71A	11/2019
MW-22B	05/2018	MW-45A	2019
MW-26A	05/2018	MW-45B	2019
MW-26B	05/2018	MW-45C	2019
MW-27A	05/2018	MW-5B	04/2020
MW-27B	05/2018	MW-62C	04/2020
MW-29A	05/2018	MW-63B	04/2020
MW-29B	05/2018	MW-66C	04/2020

In addition, monitoring wells MW-45 A/B/C were not abandoned but were inadvertently destroyed by construction activities occurring offsite in 2019.

III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the last FYR as well as the recommendations from the last FYR and the current status of those recommendations.

Table 5: Protectiveness Determinations/Statements from the 2017 FYR

OU #	Protectiveness Determination	Protectiveness Statement
1	Short-term Protective	The remedy at OU1 currently protects human health and the environment because there is no evidence that there is current exposure. However, in order to be protective in the long-term, the following actions need to be taken to ensure protectiveness: develop and implement a LTS plan that includes procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain in place and are effective; and complete a decision document to document a final decision to add ICs as a component of the selected remedy.
2	Short-term Protective	The remedy at OU2 currently protects human health and the environment because the remedy has been implemented and is operating as intended, cleanup standards have been met, and effective ICs are in place. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness: develop and implement a LTS plan that includes procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain in place and are effective; and complete a decision document to document a final decision to add ICs as a component of the selected remedy.
3	Short-term Protective	The remedy at OU3 currently protects human health and the environment because the remedial components have been implemented and are operating as intended, and there is no evidence that there is current human exposure to site contaminants. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness: review/evaluate ICs needs for other areas of Site and if needed, implement Wisconsin Continuing Obligations for those areas, and list them in the WDNR Database; develop and implement a LTS plan that includes procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain in place and are effective; and complete a decision

		document to document a final decision to add ICs as a component of the selected remedy.
Sitewide	Short-term Protective	The Site-wide remedy currently protects human health and the environment because the remedial actions have been fully implemented and are operating as intended, effective ICs have been implemented, and there is no evidence of current human exposure to Site contaminants. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness: review/evaluate ICs needs for other areas of Site and if needed, implement Wisconsin Continuing Obligations for those areas, and list them in the WDNR Database; develop and implement a LTS plan that includes procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain in place and are effective; and complete a decision document to document a final decision to add ICs as a component of the selected remedy.

Table 6: Status of Recommendations from the 2017 FYR

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
3	ICs may not cover all areas of Site where they may be needed.	Review/ evaluate ICs needs for other areas of Site. If needed implement Wisconsin Continuing Obligations, enforceable under 292.12 of the Wisconsin Statutes, and list them in the WDNR Database.	Completed	Continuing Obligations were applied and listed in the WDNR database.	12/2/2019
1,2,3	LTS procedures are needed to ensure that effective ICs are monitored, maintained, and enforced.	Develop and implement a LTS Plan with procedures for monitoring and tracking compliance with existing ICs, communicating with EPA, and providing an annual certification to EPA that the ICs remain	Completed	A Long-Term Stewardship plan was put in place in the 2019 Remedial Action Report. The LTS Checklist is reported annually as part of the yearly remedial action report.	8/1/2019

		in place and are effective.			
1,2,3	Decision documents do not require ICs for all areas needing ICs.	Complete an ESD to document a final decision to add ICs as a component of the selected remedy.	Ongoing	An ESD to add the ICs that are needed as part of the selected remedy is planned but has not been completed. EPA plans to complete the ESD by 12/31/2022.	

Status of Other Findings from the 2017 FYR

The following recommendations were identified in the 2017 FYR and may improve management of O&M and accelerate site close out, but do not affect current nor future protectiveness. A status update is provided below.

- Update the site Quality Assurance Project Plan (QAPP). There are at least 3 different QAPPs for the site and they should be streamlined into a single updated QAPP.

Status update: The PRP submitted an updated QAPP on October 30, 2017, with the intention of this updated QAPP becoming the single updated QAPP for the Site. Review of the QAPP by EPA is ongoing.

- EPA to review work done since the 1996 ROD and document these items into a decision document.

Status update: Creation of a decision document to incorporate areas which were identified after the 1996 ROD that needed to be addressed and where remedial work was conducted is in progress. This has been identified as an issue and recommendation for this FYR.

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Involvement & Site Interviews

A public notice was made available in a newspaper posting in the *Chippewa Herald*, on 4/12/2022, stating that there was a FYR and inviting the public to submit any comments to EPA. No public comments were received. The results of the review and the report will be made available at the Site information repository located at the Chippewa Falls Public Library, 105 W. Central Street, Chippewa Falls, Wisconsin. A copy of the public notice is attached as Appendix F.

Interviews:

During the FYR process, interviews were conducted to document any perceived problems or successes with the remedy that has been implemented to date. The results of these interviews are summarized below.

Derek Schad, Public Works Supervisor, Village of Lake Hallie stated that there have been no issues with the NPI Site over the review period, and that the residents near the NPI Site are hooked up to municipal water.

Lane Berg, Utilities Manager, City of Eau Claire also stated that there have been no issues with the NPI Site over the review period. City ordinances regarding wellhead protection areas and cross connections are in place and are enforced. The air stripper remains operational at the ECMWF.

Data Review

Plumes 1-2 Groundwater

A review of the laboratory analytical results for groundwater from monitoring wells in and around Plumes 1-2 shows that since 2015 no groundwater monitoring wells exceeded the ES for Site VOCs. There are no exceedances of Cd off the source property at the Site.

The RI determined that groundwater contamination from the NPI site is characterized primarily by VOCs. On-site groundwater also contains metals, which includes Cd, at concentrations above background levels in Plumes 1-2. There was no specific remedy for Cd listed in the Site RODs. Cadmium continues to be detected above the ES in an area near former Lagoon #1. Sampling has indicated that the source for the Cd is at or near the southeast corner of the NPI main building, but the specific source of Cd is unknown. MW-10A is located directly south of the main NPI building near lagoon #1. The table below shows Cd results from the last five years in select groundwater monitoring wells. NPI has proposed MNA as a viable remedy option to address the Cd concentrations. EPA is reviewing potential remedy changes for Cd in groundwater. A decision document would be required to document a change in remedy to address the Cd.

Table 7 presents sampling data for Cd in groundwater from select monitoring wells.

Table 7: Cadmium (Cd) Levels (ug/L) in Groundwater

Date:	MW-10A	MW-10B	MW-34A	MW-34B	MW-68B	MW-70B	MW-75
3/20/17	18.5	1.4 J	NS	NS	3.9 J	4.0 J	1.9 J
6/13/17	17.4	3.6 J	4.4 J	4.4 J	3.9 J	4.5 J	2.0 J
8/28/17	20.1	1.3 U	NS	NS	4.0 J	4.0 J	2.1 J
12/12/17	18.8	1.3 U	1.3 U	1.4 J	2.5 J	2.4 J	1.3 U
3/28/18	18.9	NS	NS	NS	NS	NS	NS
6/21/18	18.4	NS	7.8	NS	NS	NS	NS
8/14/18	17.9	1.3 U	6.0	1.8 J	3.2 J	3.4 J	2.4 J
12/10/18	16.1	NS	NS	NS	NS	NS	NS
3/25/19	14.4	NS	5.5	NS	NS	NS	NS
6/10/19	15.1	NS	NS	NS	NS	NS	NS
8/19/19	21.3	1.3 U	2.1 J	2.1 J	3.1 J	5.0 J	2.1 J
12/3/19	20.4	NS	NS	NS	NS	NS	NS
4/27/20	18.6	NS	1.3 U	NS	NS	NS	NS
6/8/20	18.7	NS	NS	NS	NS	NS	NS
8/24/20	23.4	1.3 U	3.9 J	2.1 J	3.5 J	5.8	1.8 J
12/2/20	21.4	NS	NS	NS	NS	NS	NS
3/16/21	16.7	NS	3.4 J	NS	NS	NS	NS
5/24/21	14.7	NS	NS	NS	NS	NS	NS
8/31/21	16.2	1.3 U	6.4	2.1 J	3.3 J	9.7	2.4 J
11/29/21	16.5	NS	NS	NS	NS	NS	NS

Bold: Exceeds Cd ES of 5ppb

J: Estimated
NS: Not Sampled
U: Not Detected

Plumes 3-4 Groundwater

A review of the groundwater monitoring data from Plumes 3-4 which originates at the MRDS and travels north to Lake Hallie shows that there are no exceedances of the ESs in any monitoring wells in Plumes 3-4.

Plume 5 Groundwater

Plume 5 historically migrated from the EDS to Lake Hallie. There were no monitoring wells sampled during the review period that are associated with plume 5. All associated monitoring wells were abandoned with EPA approval in 2011 with the exception of two, that were located side or up gradient of plume 5 and were reclassified to plume 3-4.

PFAS Sampling

NPI conducted Perfluorinated alkylated substances (PFAS) groundwater sampling in 2018 per EPA's request. Sampling rounds were conducted in August and December 2018. Samples were taken from three wells (MW-10A, MW-34A, MW-70A) near Lagoon #1 that have shown elevated levels of either TCE or Cd. These three wells were sampled in both rounds and analyzed for twenty-one (21) PFAS compounds. No samples had detections above the detection limits of 0.25 to 1.9 nanograms per liter.

Cascade Aerators and Treated Water Discharged to Surface Water

A review of laboratory analytical data from the cascade aerator treatment units indicates that removal rates at the Cascade Aerator have averaged approximately ~45%. Water discharged to the storm sewer waster system has been below surface water discharge standards. The data is reported in a quarterly discharge report and is included as part of Appendix D.

MRDS SVE System

There are twelve vent wells that penetrate the cap and are screened in the vadose zone below the waste and are intended to intercept any contaminants of concern that may leach or diffuse from the waste downward before it can potentially discharge to groundwater. Air emissions from the MRDS are sampled quarterly and analyzed to track system contaminant removal and compared to Wisconsin Administrative Code emission thresholds NR 445.07 and 406.04. The MRDS SVE system has been shut down for six months of the year for the past four years as part of trial shutdowns. The cumulative removal amounts for the past five years is 3.78 lbs. total VOCs.

Southwest Corner (aka MW-34/70 Area) SVE System

The SVE system was constructed in 2003 to address the TCE source area identified in 2002 and has operated each year seasonally. Piping runs are above ground, so the system must be shut down during the winter.

The southwest corner SVE system is used to address residual TCE present in degreaser sludge that was buried there in the mid-1900s. Air emissions for the MW-34/70 SVE system are sampled annually and , analyzed to track system contaminant removal and compared to Wisconsin Administrative Code emission thresholds NR 445.07 and 406.04. The cumulative removal amounts for the past five years is 33.5 lbs. Total VOCs.

Main Building SVE System

The main Building SVE system is located underneath building 105 and was installed in 2015 to address a suspected TCE source beneath the building. The SVE system runs continuously throughout the year. Air emissions for the Main Building SVE system are sampled quarterly and analyzed to track system contaminant removal and compared to Wisconsin Administrative Code emission thresholds NR 445.07 and 406.04. The cumulative removal amounts for the past five years are 50.8 lbs. and 62.2 lbs. for TCE and Total VOCs respectively.

Site Inspection

The inspection of the Site was conducted on 5/3/2022. In attendance were Glenn Lautenbach and Mitchell Latta RPM, EPA; Candace Sykora, WDNR; Derrick Paul, NPI; and Clifford Wright and Chelsea Payne, Gannett Fleming. The purpose of the inspection was to assess the protectiveness of the remedy.

The Site appeared to be well maintained. The cap at the MRDS was in good condition. Groundwater wells contained locks. Other areas including the SVE systems in the main building and the MW-34/70 area were in good condition. A part of the fence line that had been damaged by a falling tree branch was noted during the inspection, the PRP was aware and already in the process of repairing the fence. A copy of the completed site inspection checklist is attached as Appendix G.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

Yes.

Review of the groundwater monitoring results, remedial systems operations data, and the site inspection provide evidence that the selected engineered remedies are functioning as intended by the decision documents. No inappropriate Site or media uses have been noted during the inspection or interviews.

Capping of the MRDS and the installation and operation of the SVE system has effectively contained and controlled discharge of contaminants from the waste material in the MRDS. The cap has been maintained as required. There have not been increases in groundwater contaminant concentrations downgradient of the MRDS, indicating that the cap and SVE system are functioning as intended, and any potential contamination from the MRDS is being effectively contained by the SVE system. The ROD for OU3 requires that a deed instrument be implemented to prevent activity that would damage the MRDS cap and prohibit residential land use, and this deed instrument has been recorded and is in place.

Monitoring wells at and downgradient of the Southwest Corner demonstrate that waste removal from the source areas and containment by the groundwater extraction wells of groundwater contaminants are effective.

Monitoring wells at and downgradient of the EDS provide evidence that the removal of waste from the area has been effective in minimizing or preventing discharge of contaminants to the groundwater.

This review has verified that Lake Hallie has an ordinance in place that prohibits the installation of private wells and a permit program for those residents who have retained their private wells for non-potable uses. The city of Eau Claire does not allow cross connections between private wells and the municipal water supply. Eau Claire enacted an ordinance that restricts construction of new private water supply wells within the city as well as requiring abandonment of existing supply wells. Interviews with staff at both Lake Hallie and Eau Claire municipalities confirm that the ordinances are still being enforced.

The monitoring well network that is in place both on and off the NPI property provides the data needed to assess the effectiveness of the selected remedies.

With the exception of Cd, cleanup goals for groundwater have been met at the Site. The persistent concentrations of Cd in the groundwater near the Southwest Corner indicated the presence of a minor residual source in the vicinity. NPI presented lines of evidence in a December 19, 2016, report (Gannett Fleming, 2016), to demonstrate that MNA is a viable option for Cd-contaminated groundwater at the Site. EPA is reviewing the potential remedies for Cd in groundwater and will document a decision for the selected remedy after doing so.

A LTS Plan was developed and implemented ensuring that the ICs are maintained, monitored, and enforced so that the remedy continues to function as intended. NPI completes the items listed on the LTS Checklist at their listed frequency and reports them in their annual report.

The Site decision documents did not list all the areas that were included in the remedial actions and the necessity to include ICs for those areas. Decision documents need to be implemented to document these additions to the remedy.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

Yes.

There have been no changes in the physical conditions of the site that would affect the protectiveness of the selected remedies at this site and neither has there been any substantive change in the use of the property during the last five years. Potential exposure scenarios remain the same.

There have been no changes in either the contaminant characteristics or the standards for protecting groundwater as they relate to the contaminants of concern at the Site. There have been no changes to the applicable or relevant and appropriate requirements (ARARs) as they apply to the groundwater (WAC Ch. NR 140 ESs). Contaminant concentrations of TCE are below the ES.

Five new areas of contamination were identified subsequent to the 1996 ROD – the east extension of Lagoon #1, the southwest property corner, a swale between Lagoons #3 and #4, the southwest corner of Lagoon #2, and the loading dock area. Contamination in each area is being addressed. The waste forge compound mixed with soil in the east extension of Lagoon #1 and the contaminated surficial soils at the southwest property corner were excavated and consolidated under the cap at the MRDS. Soils from the swale between Lagoons #3 and #4, the southwest corner of Lagoon #2, and the loading dock area were excavated and disposed of at an off-site landfill. Residual contamination in these areas is being addressed through additional remedial activities and/or ICs. SVE systems have also been installed in the main building and the southwest corner to address contamination. NPI is also investigating a Cd area near the southwest corner of the Site and is proposing a MNA remedy for the Cd. Decision documents are still required to document these activities.

The emerging contaminants 1,4-dioxane and PFAS were investigated through groundwater sampling in 2016 and 2018 respectively. The 1,4-dioxane results were below the detection limits and the ESs. The PFAS results were also below detection limits in all samples.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

No.

No new information has come to light in the last five years that would call into question the current protectiveness of the selected remedies at the NPI site. There have been no newly discovered ecological risks. There have been no impacts from natural disasters and no new climate change vulnerabilities.

VI. ISSUES/RECOMMENDATIONS

Issues/Recommendations	
OU(s) without Issues/Recommendations Identified in the Five-Year Review:	
None	

Issues and Recommendations Identified in the Five-Year Review:				
OU(s): 1, 2, 3	Issue Category: Institutional Controls			
	Issue: Decision documents do not require ICs for all areas needing ICs.			
	Recommendation: Create a decision document that incorporates all ICs that are needed as a component of the selected remedy.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA	12/31/2022

OU(s): 3	Issue Category: Institutional Controls			
	Issue: Work had been done on the Site since the 1996 ROD that has not been recorded in a decision document as part of the site remedy.			
	Recommendation: Complete a decision document to document the additional work completed on the Site as part of the site remedy needed.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA	12/31/2023

OU(s): 3	Issue Category: Remedy Performance			
	Issue: There is an area of the Site where Cd in groundwater still exceeds MCLs and ESs. EPA is currently reviewing possible remedies for Cd in groundwater. A decision document will need to be completed to document the change in remedy			
	Recommendation: Review and document remedy for Cd in groundwater.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA	12/31/2023

VII. PROTECTIVENESS STATEMENT

Protectiveness Statement(s)	
<i>Operable Unit:</i> OU1	<i>Protectiveness Determination:</i> Short-term Protective
<p><i>Protectiveness Statement:</i> The remedy at OU1 currently protects human health and the environment because the groundwater pump and treat remedy has been implemented and is operating as intended to prevent the off-site movement of contaminated groundwater, and there is no evidence that there is current human exposure to Site contaminants. However, in order for the remedy to be protective in the long term, the following action needs to be taken to ensure protectiveness:</p> <ul style="list-style-type: none"> • Creation of a decision document incorporating ICs for areas which do not meet UU/UE as part of the remedy. 	

Protectiveness Statement(s)	
<i>Operable Unit:</i>	<i>Protectiveness Determination:</i>

OU2	Short-term Protective
<p><i>Protectiveness Statement:</i></p> <p>The remedy at OU2 currently protects human health and the environment because the remedy has been implemented, is operating as intended, and the alternative water supply was constructed and is in place. However, in order for the remedy to be protective in the long-term, the following action needs to be taken to ensure protectiveness:</p> <ul style="list-style-type: none"> • Creation of a decision document incorporating ICs for areas which do not meet UU/UE as part of the remedy. 	

Protectiveness Statement(s)	
<i>Operable Unit:</i> OU3	<i>Protectiveness Determination:</i> Short-term Protective
<p><i>Protectiveness Statement:</i></p> <p>The remedy at OU3 currently protects human health and the environment because the remedial components including the consolidation of wastes to the MRDS, the installation of an SVE system and multilayer cap at the MRDS, ICs at the MRDS, and groundwater monitoring have been implemented and are operating as intended, and there is no evidence that there is current human exposure to site contaminants. A LTS plan is in place that includes procedures for monitoring and tracking compliance with ICs. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness:</p> <ul style="list-style-type: none"> • Creation of a decision document incorporating ICs for areas which do not meet UU/UE as part of the remedy. • Creation of a decision document to incorporate the additional and necessary remedial work done since the last 1996 ROD as part of the site remedy. • Review remedy and create a decision document to address the exceedances of Cd in groundwater. 	

Sitewide Protectiveness Statement	
<p><i>Protectiveness Determination:</i> Short-term Protective</p>	
<p><i>Protectiveness Statement:</i> The Site-wide remedy currently protects human health and the environment because the remedial actions have been fully implemented and are operating as intended, effective ICs have been implemented, and there is no evidence of current human exposure to Site contaminants. However, for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness:</p> <ul style="list-style-type: none"> • Creation of a decision document incorporating ICs for areas which do not meet UU/UE. • Creation of a decision document to incorporate the additional and necessary remedial work done since the last 1996 ROD as part of the site remedy. • Review remedy and create a decision document to address the exceedances of Cd in groundwater. 	

VIII. NEXT REVIEW

The next FYR report for the National Presto Industries, Inc. Superfund Site is required five years from the completion date of this review.

APPENDIX A – REFERENCE LIST

- EPA, 1990. *Record of Decision, National Presto Industries Inc.* August 1, 1990.
- EPA, 1991. *Record of Decision, Selected Interim Action Alternative, National Presto Industries Inc.* September 30, 1991.
- EPA, 1993. *Administrative Order on Consent – Removal Actions – Docket V-W-93-C-209.* October 14, 1993.
- Eder Associates, 1994. *Final Remedial Investigation Report.* August 8, 1994.
- EPA, 1994. *Modifications to Administrative Order on Consent.* November 4, 1994.
- EPA, 1996. *Record of Decision, National Presto Industries, Inc.* May 15, 1996.
- EPA, 1999. *Preliminary Close Out Report.* September 1999.
- Gannett Fleming, 2003. *Groundwater Monitoring Plan.* May 6, 2003
- EPA, 2009. *Explanation of Significant Differences* December 23, 2009.
- EPA, 2012. *Fourth Five-Year Review.* September 4, 2012.
- Gannett Fleming, 2015. *Compilation and Analysis of Cadmium Soil and Groundwater Data.* June 23, 2015.
- Gannett Fleming, 2016. *Multiple Lines of Evidence for RNA/MNA of Cadmium in Groundwater.* December 19, 2016.
- Gannett Fleming, 2017. *Groundwater Analytical Results for 1,4 Dioxane at NPI,* May 25, 2017
- EPA, 2017. *Fifth Five-Year Review.* July 19, 2017
- Gannett Fleming. *Monthly Progress Reports.* 2017-2021
- Gannett Fleming. *Annual Remedial Action Reports.* 2017-2021
- Gannett Fleming. *Quarterly Discharge Monitoring Reports.* 2017-2021
- Gannett Fleming. *Annual Discharge Monitoring Reports.* 2017-2021.

- Gannett Fleming, 2019. Groundwater Analytical Results for Perfluoroalkyl Substances Analysis. February 11, 2019.
- Gannett Fleming, 2019. *Remedial Action Report Institutional Control Implementation and Assurance and Lon-Term Stewardship Plans*. August 2019.
- Gannett Fleming, 2020. *Updated Operation and Maintenance Plan for the MRDS Cap and SVE System*. August 31, 2020.
- Gannett Fleming, 2021. *Annual Interim Remedial Action Status Report for 2020*. March, 2021.

APPENDIX B

Site Chronology

Date:	Event:
1942-1945	The site was a government owned, contractor operated producer of ordnance chemicals and radar tubes.
1947	NPI purchased the property from the U.S. government. The company initially manufactured household appliances and outboard motors at the facility.
1951	Artillery shell fuses and aircraft parts were produced by NPI under military contracts.
1954	NPI had dedicated the site entirely to defense related manufacturing, primarily the production of metal parts for 105-MM and 8-inch artillery shells, under contract with the Department of the Army.
1959-1965	NPI engaged in little to no active production at the site.
1966	The site was again activated, and multi-shift production continued until the mid-70s.
1971	Production of the 8-inch shells ceased.
1980	Production of 105-MM projectiles ceased.
1983-1984	There was a six-month research and development contract.
1981 and 1992	National Defense Corporation, a wholly owned subsidiary of NPI, entered into annual standby contract with the Department of the Army to maintain the site in a high state of readiness.
1996	Jettar, LTD, entered into a lease with NPI, and a portion of the facility was used for producing baby diapers. RMED International, Inc. (RMED) latter acquired the assets of Jettar, LTD.
2001	Presto Absorbent Products, Inc., (PAPI) a wholly owned subsidiary of NPI, purchased the assets of RMED
2004	PAPI began producing adult incontinence diapers at the facility.
2011	The warehouse used by PAPI, was expanded by 66,000 square feet.
2017	NPI sold the assets of PAPI to Drylock Technologies LTD. (Drylock), a Belgium based company. Drylock has entered into a long-term lease for a portion of the facility and will continue production of adult incontinence products at the facility.
2018	An additional office building was built and added to the long-term lease with Drylock.

APPENDIX C

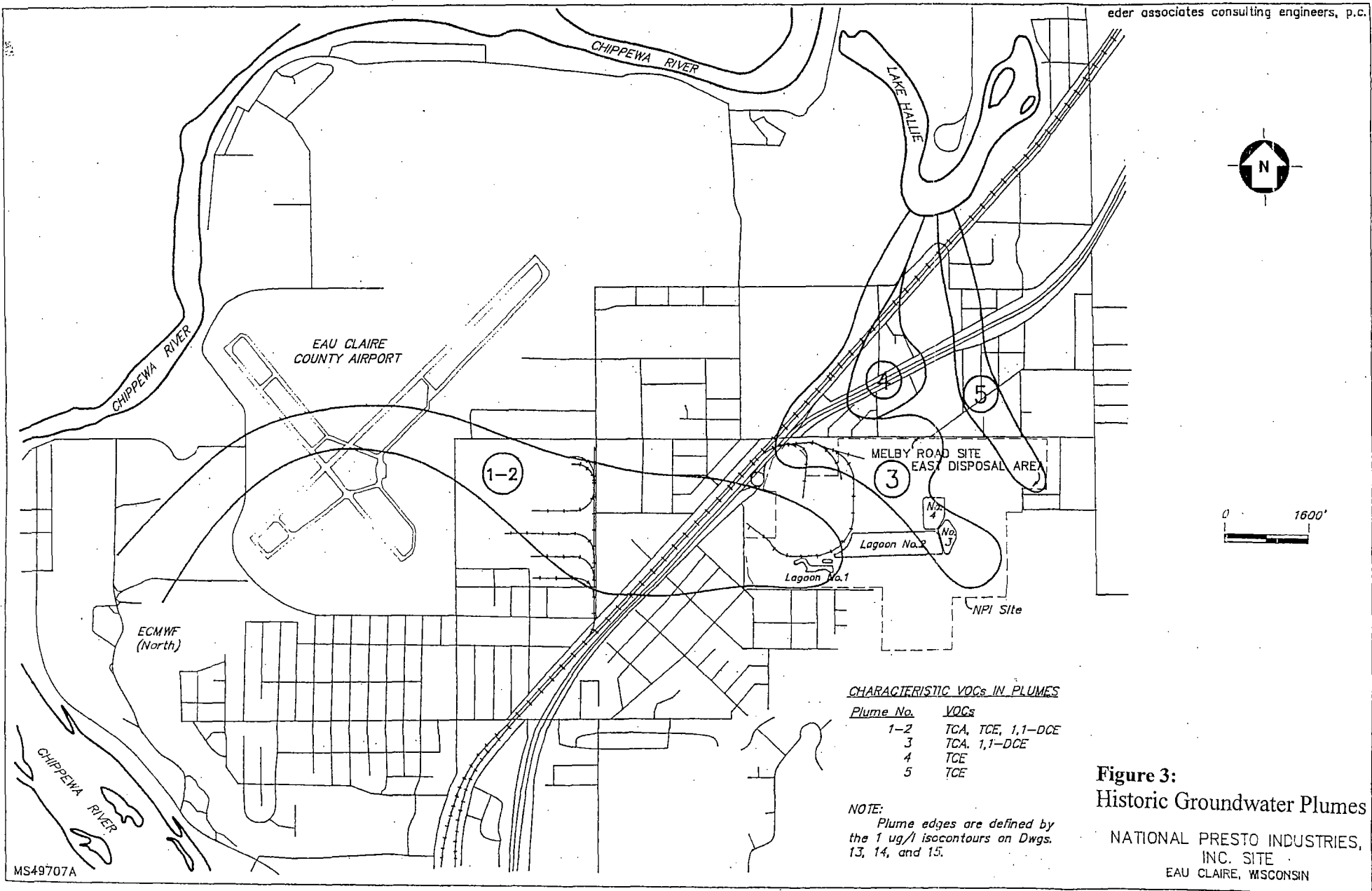
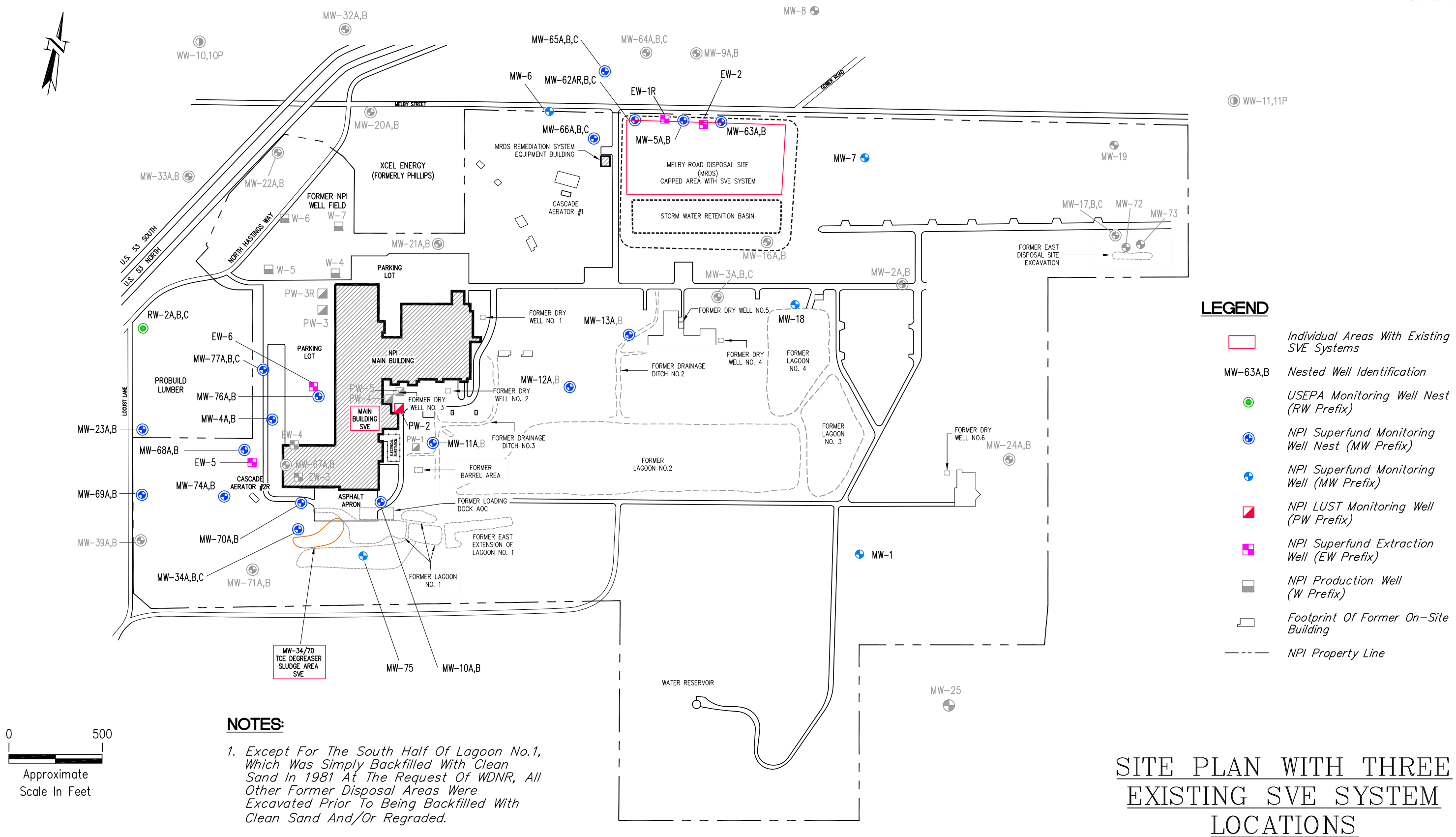


Figure 3:
Historic Groundwater Plumes

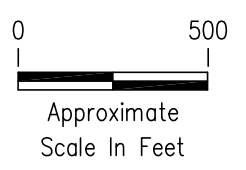
NATIONAL PRESTO INDUSTRIES,
INC. SITE
EAU CLAIRE, WISCONSIN



LEGEND

- Individual Areas With Existing SVE Systems
- MW-63A,B Nested Well Identification
- 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)
- NPI Production Well (W Prefix)
- Footprint Of Former On-Site Building
- NPI Property Line

- NOTES:**
1. Except For The South Half Of Lagoon No.1, Which Was Simply Backfilled With Clean Sand In 1981 At The Request Of WDNR, All Other Former Disposal Areas Were Excavated Prior To Being Backfilled With Clean Sand And/Or Regraded.
 2. Shaded Wells Have Been Abandoned And Shaded Buildings Have Been Demolished And Removed.



SITE PLAN WITH THREE EXISTING SVE SYSTEM LOCATIONS

2020 ANNUAL REPORT
NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

APPENDIX D

INTERIM REMEDIAL ACTION; ON-SITE GROUNDWATER EXTRACTION (2017-2021)

Year	Month	Discharge ⁽¹⁾ (MM gal)	EW-5 ⁽²⁾ (gpm)	EW-6 (gpm)	Comments
2017					
	January	4.0	offline	186	EW-6 shut down (SD) for 12-month trial on 1/16/17: approved by EPA/WDNR
	February	0	"	offline	
	March	0	"	"	TCE in MW-76A rebounded from <0.33 to 4.6 ppb; EW-6 to restart
	April	1.1	"	187	EW-6 resumed operation on 4/27/17
	May	8.2	"	184	
	June	8.0	"	185	
	July	8.3	"	186	
	August	8.4	"	188	
	September	7.9	"	184	
	October	8.3	"	185	
	November	8.0	"	184	
	December	8.3	"	185	
2018					
	January	8.2	offline	183	
	February	7.4	"	183	
	March	7.1	"	182	EW-6 temporarily SD on 3/28/18 for building addition waterline installation
	April	4.7	"	181	EW-6 resumed operation on 4/13/18
	May	8.1	"	182	
	June	7.8	"	180	
	July	8.1	"	181	
	August	8.0	"	179	
	September	7.8	"	180	
	October	7.9	"	176	
	November	7.7	"	177	
	December	4.9	"	178	EW-6 SD Dec 12-19 for redevelopment and on Dec 26 due to short circuit
2019					
	January	5.2	offline	181	EW-6 restarted on 1/4/19 but offline Jan 16-24 for pump replacement
	February	7.2	"	180	
	March	7.7	"	174	
	April	7.6	"	176	
	May	7.9	"	177	
	June	7.7	"	178	
	July	8.0	"	179	
	August	8.1	"	180	
	September	7.8	"	180	
	October	8.1	"	183	
	November	8.0	"	184	
	December	8.1	"	181	
2020					
	January	7.8	offline	174	
	February	6.8	"	163	
	March	5.9	"	178	EW-6 SD on Mar 2 for redevelopment; resumed operating on Mar 10
	April	6.2	"	161	
	May	7.8	"	176	
	June	7.6	"	176	
	July	8.0	"	179	
	August	8.0	"	179	
	September	7.8	"	180	
	October	8.0	"	179	
	November	7.7	"	179	
	December	8.0	"	179	

INTERIM REMEDIAL ACTION; ON-SITE GROUNDWATER EXTRACTION (2017-2021)

Year	Discharge ⁽¹⁾ (MM gal)	EW-5 ⁽²⁾ (gpm)	EW-6 (gpm)	Comments
2021				
January	7.9	offline	177	
February	5.4	"	147	
March	6.2	"	143	EW-6 SD on 3/31/21 for redevelopment
April	6.3	"	167	EW-6 resumed operation on 4/5/21
May	8.1	"	180	
June	7.8	"	180	
July	7.9	"	177	
August	7.8	"	175	
September	0.082	"	offline	EW-6 SD for 12-month trial on 9/1/21; approved by EPA/WDNR
October	0	"	"	
November	0	"	"	
December	0	"	"	TCE ↑ in MW-76A & EW-6 so EW-6 resumed operating full-time on 1/18/2022

NOTES:

Pumping rates for extraction well EW-6 are in gallons per minute (gpm) for months when pump operated >24 hr/day.

SD = Shut down.

FOOTNOTES:

(1) Discharge = Groundwater pump-and-treat volume in millions of gallons (MM gal).

(2) Extraction well EW-5 offline since 9/12/15 as approved by EPA/WDNR.

REMEDIAL DESIGN/REMEDIAL ACTION; MELBY ROAD DISPOSAL SITE SVE SYSTEM OPERATING DATA SUMMARY (2017-2021)

Year	Vacuum	Flow ⁽²⁾	Vacuum ⁽³⁾	VWF ⁽⁴⁾	SVE Gas ⁽⁵⁾	Comments
Month	Blowers ⁽¹⁾	(acfm)	(inch wc)	Screened?	Sampled?	Q1 = Jan-Mar; Q2 = Apr-Jun; Q3 = Jul-Sep; Q4 = Oct-Dec
2017						
January	0	--	--	N	N	SVE offline for 6-month trial seasonal shutdown (SSD)
February	0	--	--	N	N	
March	0	130	<1	Y	Y	Measurable increase in VOCs, but < threshold levels ⁽⁶⁾
April	0	--	--	N	N	
May	0	--	--	N	N	
June	1	570	5-6	Y	Y	VOCs ↑ but < threshold levels ⁽⁶⁾ ; normal operation resumed
July	1	570	3-4	N	N	
August	1	570	3-4	Y	Y	
September	1	570	4	N	N	
October	1	570	4-6	N	N	SVE offline intermittently for 27.6 hr during road upgrade
November	1	570	3-6	N	N	
December	1	570	3-4	Y	Y	SVE offline 4 hr for electrical work; SSD started 12/14/17
2018						
January	0	--	--	N	N	
February	0	--	--	N	N	
March	0	200	<1	Y	Y	Measurable increase in VOCs, but < threshold levels ⁽⁶⁾
April	0	--	--	N	N	
May	0	--	--	N	N	
June	1	570	6	Y	Y	VOCs ↑ but < threshold levels ⁽⁶⁾ ; normal operation resumed
July	1	570	3-6	N	N	
August	1	570	3-4	Y	Y	
September	1	570	3	N	N	
October	1	570	3-6	N	N	
November	1	570	3-6	N	N	
December	1	570	3-4	Y	Y	Seasonal 6-month trial SD started on 12/14/18
2019						
January	0	--	--	N	N	
February	0	--	--	N	N	
March	0	<230	<1	Y	Y	Measurable increase in VOCs, but < threshold levels ⁽⁶⁾
April	0	--	--	N	N	
May	0	--	--	N	N	
June	1	570	7	Y	Y	VOCs ↑ but < threshold levels ⁽⁶⁾ ; normal operation resumed
July	1	570	3-6	N	N	
August	1	570	4	Y	Y	
September	1	570	3-4	N	N	
October	1	570	3-6	N	N	
November	1	<240	<1	N	N	
December	1	<240	<1	Y	Y	Seasonal 6-month trial SD started on 12/4/19

REMEDIAL DESIGN/REMEDIAL ACTION; MELBY ROAD DISPOSAL SITE SVE SYSTEM OPERATING DATA SUMMARY (2017-2021)

Year	Vacuum	Flow ⁽²⁾	Vacuum ⁽³⁾	VWF ⁽⁴⁾	SVE Gas ⁽⁵⁾	Comments
Month	Blowers ⁽¹⁾	(acfm)	(inch wc)	Screened?	Sampled?	Q1 = Jan-Mar; Q2 = Apr-Jun; Q3 = Jul-Sep; Q4 = Oct-Dec
2020						
January	0	--	--	N	N	
February	0	--	--	N	N	
March	0	<230	<1	N	Y	VOCs increased, but < threshold levels ⁽⁶⁾ ; no FID available
April	0	--	--	N	N	
May	0	--	--	N	N	
June	1	570	6	Y	Y	VOCs ↑ but < threshold levels ⁽⁶⁾ ; normal operation resumed
July	1	570	3-6	N	N	
August	1	570	3-4	Y	Y	
September	1	570	3-4	N	N	
October	1	570	4-6	N	N	
November	1	570	3-6	N	N	
December	1	570	4	Y	Y	Seasonal 6-month trial SD started on 12/2/20
2021						
January	0	--	--	N	N	
February	0	--	--	N	N	
March	0	<230	<1	Y	Y	Measurable increase in VOCs, but < threshold levels ⁽⁶⁾
April	0	--	--	N	N	
May	1	570	6	Y	Y	VOCs ↑ but < threshold levels ⁽⁶⁾ ; normal operation resumed
June	1	570	6	N	N	
July	1	570	4-6	N	N	
August	1	570	4-6	N	N	
September	1	570	5-6	Y	Y	
October	1	570	4-6	N	N	
November	1	570	4-5	Y	Y	Seasonal 6-month trial SD started on 11/29/21
December	0	--	--	N	N	

NOTES:

SSD = 6-month trial seasonal shut down approved by EPA/WDNR.

SVE = Soil vapor extraction.

-- = Not applicable because the SVE system did not operate.

FOOTNOTES:

(1) Vacuum blowers = # of SVE blowers operating (out of 3) in normal-flow mode (i.e., not counting low-flow operation in Q1).

(2) Flow = Vapor flow rate in actual cubic feet per minute (acfm), including low-flow for Q1 monitoring.

(3) Vacuum = Manifold vacuum in inches of water column (inch wc), including low-flow for Q1 monitoring

(4) VWF = Vent well field screened with a flame ionization detector (FID) or photoionization detector (Y/N)?

(5) SVE Gas = SVE exhaust gas sampled (Y/N)?

(6) VOC concentrations compared to levels in exhaust gas when each seasonal SD period started for tracking purposes.

QUARTERLY DISCHARGE MONITORING REPORT (Q-DMR) SUMMARY (2017-2021)

Sample Date	Substance Concentration (µg/ℓ), Result Qualifier (RQ), and Percent Removal (% Removal) ⁽¹⁾															EOQ Date ⁽²⁾
	1,1,1-Trichloroethane			1,1-Dichloroethane			1,1-Dichloroethylene			Tetrachloroethylene			Trichloroethylene (TCE)			Flow Rate (MGD) ⁽³⁾
Sample Location	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	
Discharge Limit	NLE	na	na	NLE	na	na	50	na	na	50	na	na	100	na	na	NLE
3/21/2017																3/31/2017
EW-6 ⁽⁴⁾	0.50	U	na	0.24	U	na	0.41	U	na	0.50	U	na	0.33	U	na	0.268
Manhole MH-18	ns		--	ns		--	ns		--	ns		--	ns		--	0.268
6/13/2017																6/30/2017
EW-6 ⁽⁵⁾	1.4		na	0.24	U	na	0.41	U	na	0.50	U	na	0.75	J	na	0.266
Manhole MH-18	0.83	J	41	0.24	U	--	0.41	U	--	0.50	U	--	0.39	J	48	0.266
8/28/2017																9/30/2017
EW-6	1.3	A	na	0.24	UA	na	0.41	UA	na	0.50	UA	na	0.82	JA	na	0.268
Manhole MH-18	0.88	J	32	0.24	U	--	0.41	U	--	0.50	U	--	0.54	J	34	0.268
12/13/2017 (EW-6) and 12/12/2017 (MH-18)																12/31/2017
EW-6	1.25	A	na	0.24	UA	na	0.41	UA	na	0.50	UA	na	0.71	JA	na	0.266
Manhole MH-18	0.61	J	51	0.24	U	--	0.41	U	--	0.50	U	--	0.51	J	28	0.266
3/27/2018																3/31/2018
EW-6	1.5		na	0.24	U	na	0.41	U	na	0.50	U	na	0.87	J	na	0.263
Manhole MH-18	0.94	J	37	0.24	U	--	0.41	U	--	0.50	U	--	0.68	J	22	0.263
6/19/2018																6/30/2018
EW-6	1.2		na	0.24	U	na	0.41	U	na	0.50	U	na	0.75	J	na	0.261
Manhole MH-18	0.50	U	58	0.24	U	--	0.41	U	--	0.50	U	--	0.46	J	39	0.261
8/14/2018																9/30/2018
EW-6	1.0	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.75	JA	na	0.259
Manhole MH-18	0.71	J	31	0.27	U	--	0.24	U	--	0.33	U	--	0.57	J	23	0.259
12/10/2018																12/31/2018
EW-6	0.93	J	na	0.27	U	na	0.24	U	na	0.33	U	na	0.89	J	na	0.255
Manhole MH-18	0.45	J	52	0.27	U	--	0.24	U	--	0.33	U	--	0.41	J	54	0.255
3/25/2019																3/31/2019
EW-6	0.97	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.83	JA	na	0.256
Manhole MH-18	0.56	J	42	0.27	U	--	0.24	U	--	0.33	U	--	0.49	J	41	0.256
6/12/2019																6/30/2019
EW-6	0.99	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.71	JA	na	0.255
Manhole MH-18	0.72	J	27	0.27	U	--	0.24	U	--	0.33	U	--	0.60	J	15	0.255
8/19/2019																9/30/2019
EW-6	1.05	A	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.72	JA	na	0.259
Manhole MH-18	0.58	J	45	0.27	U	--	0.24	U	--	0.33	U	--	0.47	J	34	0.259

QUARTERLY DISCHARGE MONITORING REPORT (Q-DMR) SUMMARY (2017-2021)

Sample Date	Substance Concentration (µg/ℓ), Result Qualifier (RQ), and Percent Removal (% Removal) ⁽¹⁾															EOQ Date ⁽²⁾
	1,1,1-Trichloroethane			1,1-Dichloroethane			1,1-Dichloroethylene			Tetrachloroethylene			Trichloroethylene (TCE)			Flow Rate
Sample Location	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	ug/L	RQ	% Removal	(MGD) ⁽³⁾
Discharge Limit	NLE	na	na	NLE	na	na	50	na	na	50	na	na	100	na	na	NLE
12/3/2019																12/31/2019
EW-6	0.99	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.61	JA	na	0.263
Manhole MH-18	0.48	J	51	0.27	U	--	0.24	U	--	0.33	U	--	0.58	J	4.9	0.263
3/26/2020																3/31/2020
EW-6	1.3		na	0.27	U	na	0.24	U	na	0.33	U	na	0.73	J	na	0.244
Manhole MH-18	0.66	J	49	0.27	U	--	0.24	U	--	0.33	U	--	0.50	J	32	0.244
6/8/2020																6/30/2020
EW-6	1.03	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.75	JA	na	0.244
Manhole MH-18	0.62	J	40	0.27	U	--	0.24	U	--	0.33	U	--	0.57	J	23	0.244
8/24/2020																9/30/2020
EW-6	1.10	A	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.88	JA	na	0.258
Manhole MH-18	0.69	J	37	0.27	U	--	0.24	U	--	0.33	U	--	0.67	J	24	0.258
12/2/2020																12/31/2020
EW-6	0.81	JA	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.74	JA	na	0.258
Manhole MH-18	0.42	J	48	0.27	U	--	0.24	U	--	0.33	U	--	0.62	J	16	0.258
3/16/2021																3/31/2021
EW-6	1.2	A	na	0.27	UA	na	0.24	UA	na	0.33	UA	na	0.82	JA	na	0.225
Manhole MH-18	0.66	J	45	0.27	U	--	0.24	U	--	0.33	U	--	0.54	J	34	0.225
5/24/2021																6/30/2021
EW-6	1.25	JA	na	0.30	UA	na	0.58	UA	na	0.41	UA	na	0.75	JA	na	0.254
Manhole MH-18	0.39	JA	69	0.30	U	--	0.58	U	--	0.41	U	--	0.32	UA	57	0.254
8/31/2021																9/30/2021
EW-6 ⁽⁶⁾	0.86	JA	na	0.30	UA	na	0.58	UA	na	0.41	UA	na	0.98	JA	na	0.251
Manhole MH-18	0.55	J	36	0.30	U	--	0.58	U	--	0.41	U	--	0.73	J	25	0.251
11/29/2021																12/31/2021
EW-6 ^(6,7)	1.9	A	na	1.55	A	na	0.58	UA	na	0.84	JA	na	2.25	A	na	0.0
Manhole MH-18 ⁽⁸⁾	ns		--	ns		--	ns		--	ns		--	ns		--	0.0

QUARTERLY DISCHARGE MONITORING REPORT (Q-DMR) SUMMARY (2017-2021)

NOTES:

Concentrations are in micrograms per liter ($\mu\text{g}/\ell$) or parts per billion (ppb), and the NR 140 Enforcement Standard/federal Maximum Contaminant Level for TCE is 5 ppb.

Melby Road Disposal Site extraction wells EW-1R and EW-2 are currently shut down, as approved by the EPA/WDNR.

Cascade aerator CAS-1 has been inactive since Oct 2010 because EW-1R and EW-2 have not been operating.

Southwest Corner extraction well EW-5 is currently shut down, as approved by the EPA/WDNR. The pump was removed from EW-5 on 9/18/2015 & has not been replaced.

Manhole MH-18 = Effluent 1 (+) Effluent 2 for flow. Effluent 2 = MH-18 for concentrations because MH-18 and cascade aerator CAS-2R are less than 60 feet apart.

A = Average of original sample and duplicate.

J = Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

na = Not applicable.

NLE = No limit established.

ns = No sample collected for discharge monitoring.

RQ = Result qualifiers.

U = Parameter not detected at or above the indicated value, which is the detection limit for measured concentrations.

-- = % Removal not calculated because either influent concentration was less than the limit of detection or effluent was not sampled.

FOOTNOTES:

(1) Target % Removal \geq 25 percent.

(2) EOQ Date = End of quarter date for DMR data shown.

(3) Flow rate in millions of gallons per day (MGD) calculated based on metered volume divided by pumping days in the quarter.

(4) Southwest Corner extraction well EW-6 was taken offline to start a 12-month trial shutdown on 1/16/2017, as approved by EPA/WDNR. Sample was collected using a HydraSleeve on 3/21/2017. Consequently, analytical results were summarized in the 2017 annual report but not in the 2017 Q1 DMR.

(5) TCE rebounded from <0.33 ppb on 12/6/2016 to 4.6 ppb on 3/21/2017 in key monitoring well MW-76A, so EW-6 resumed full-time operation on 4/27/2017.

(6) EW-6 was taken offline to start a 12-month trial shutdown on 9/1/2021, as approved by the EPA/WDNR.

(7) However, TCE rebounded in MW-76A (from <0.32 to 0.89 ppb) and EW-6, as shown. Consequently, EW-6 was redeveloped & resumed operating full-time on 1/18/2022.

(8) Volume of pumped groundwater $<1,000$ gal, so MH-18 not sampled.

NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

ANNUAL DISCHARGE MONITORING RESULTS FOR 2017

Parameter	Sample ⁽¹⁾				Discharge Limits			Result Qualifier(s)
	Frequency	Type	Results	Units	Daily Max.	Weekly Avg.	Monthly Avg.	
Cadmium, total recoverable ⁽²⁾	Annual	Grab	1.3	ug/L	240			U
		Calculated	0.0029	lb/day		0.22		U
Chromium, total recoverable	1 per 2 yrs	Grab	2.5	ug/L	19,000			U
		Calculated	0.0056	lb/day		10		U
Chromium, +6	1 per 2 yrs	Grab	5.1	ug/L	240			U
		Calculated	0.0113	lb/day				U
Copper, total recoverable	1 per 2 yrs	Grab	8.0	ug/L	160			J
Hardness, total as CaCO ₃	Annual	Grab	51.9	mg/L				
Lead, total recoverable	1 per 2 yrs	Grab	6.8	ug/L	1,300			J
		Calculated	0.0151	lb/day		1.3		J
Nickel, total recoverable	Annual	Grab	4.7	ug/L	11,000			J
		Calculated	0.0104	lb/day		13		J
Pentachlorophenol	1 per 2 yrs	Grab	1.4	ug/L	70			U
pH (field)	Annual	Grab	7.5	su	6 to 9			
Temperature (field)	Annual	Grab	54	°F				
Acenaphthene (PAH)	Annual	Grab	0.050	ug/L				
Acenaphthylene (PAH)	Annual	Grab	0.0047	ug/L				J
Anthracene (PAH)	Annual	Grab	0.013	ug/L				J
Benzo(a)anthracene (PAH)	Annual	Grab	0.0068	ug/L				U
Benzo(a)pyrene (PAH)	Annual	Grab	0.0095	ug/L				U
Benzo(b)fluoranthene (PAH)	Annual	Grab	0.0052	ug/L				U
Benzo(g,h,i)perylene (PAH)	Annual	Grab	0.0061	ug/L				U
Benzo(k)fluoranthene (PAH)	Annual	Grab	0.0068	ug/L				U
Chrysene (PAH)	Annual	Grab	0.012	ug/L				U
Dibenzo(a,h)anthracene (PAH)	Annual	Grab	0.0090	ug/L				U
Fluoranthene (PAH)	Annual	Grab	0.0096	ug/L				U
Fluorene (PAH)	Annual	Grab	0.022	ug/L				J
Indeno(1,2,3,c,d)pyrene (PAH)	Annual	Grab	0.016	ug/L				U
1-Methylnaphthalene (PAH)	Annual	Grab	0.096	ug/L				
2-Methylnaphthalene (PAH)	Annual	Grab	0.027	ug/L				
Naphthalene (PAH)	Annual	Grab	0.072	ug/L				J
Phenanthrene (PAH)	Annual	Grab	0.023	ug/L				J
Pyrene (PAH)	Annual	Grab	0.0069	ug/L				U
PAHs, total (summation)	Annual	Grab	0.3956	ug/L				JU
		Calculated	0.00088	lb/day			0.91	U
Zinc, total recoverable	Annual	Grab	55.5	ug/L	1,000			

NOTES:

J = Estimated concentration below laboratory quantification level. Calculated discharge limits based on estimated concentrations are J flagged, also.

U = Parameter not detected at or above the indicated value, which is the detection limit for measured concentrations or a flow-weighted number for calculated levels.

FOOTNOTES:

(1) Samples collected from MH-18 on 12/12/17 (dissolved cadmium) and 12/19/17 (all other parameters). Calculated mass discharge estimates based on the average flow of 185 gpm.

(2) The sample submitted for cadmium analysis was inadvertently filtered, and thus the results represent dissolved concentrations. The data are within the historical range.

NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

ANNUAL DISCHARGE MONITORING RESULTS FOR 2018

Substance/Parameter	Sample ⁽¹⁾				Discharge Limits		Result Qualifier(s)
	Frequency	Type	Results	Units	Daily Maximum	Weekly Average	
Cadmium (Cd), total recoverable	Annual	Grab	0.13	µg/L	240		J
		Calculated ⁽²⁾	0.00028	lb/day		0.22	J
pH (field)	Annual	Grab	7.1	su	6 to 9		
Temperature (field)	Annual	Grab	55	°F			

NOTE:

J = Estimated concentration below laboratory quantification level. The calculated mass discharge rate, which is based on an estimated concentration, is J flagged also.

FOOTNOTES:

(1) Samples collected from manhole MH-18 on 8/14/18. Average flow rate in 2018 = 180 gallons per minute (gpm).

(2) Calculated mass discharge rate based on the estimated average flow and measured Cd concentration, as shown below.

$$\begin{array}{cccccc}
 180 \text{ gal} & 3.785 \text{ L} & 1,440 \text{ min} & 1 \text{ lb} & 0.13 \text{ } \mu\text{g} & \\
 \hline
 & & & & & = 0.00028 \text{ lb/day total recoverable Cd} \\
 \text{min} & 1 \text{ gal} & 1 \text{ day} & 4.54 \times 10^8 \text{ } \mu\text{g} & \text{L} &
 \end{array}$$

NATIONAL PRESTO INDUSTRIES
EAU CLAIRE, WISCONSIN

MANHOLE MH-18 PRIORITY POLLUTANT SAMPLE AND ANALYTICAL RESULTS SUMMARY FOR 2018

Group Description and Analytical Method Analyte	Sample			Result (µg/ℓ)	Result Qualifier(s)
	Type ⁽¹⁾	Date			
CYNO GROUP by SM 4500-CN-E					
Cyanide, total	Grab	08/14/18		6.7	U
Cyanide, amenable	Grab	08/14/18		6.7	U
PCBs by EPA 608					
PCB-1016	Grab	08/14/18		0.24	U
PCB-1221	Grab	08/14/18		0.24	U
PCB-1232	Grab	08/14/18		0.24	U
PCB-1242	Grab	08/14/18		0.24	U
PCB-1248	Grab	08/14/18		0.24	U
PCB-1254	Grab	08/14/18		0.24	U
PCB-1260	Grab	08/14/18		0.24	U
PESTICIDES by EPA 608					
Aldrin	Grab	08/14/18		0.0071	U
<i>alpha</i> -BHC (a-hexachloro-cyclohexane)	Grab	08/14/18		0.0075	U
<i>beta</i> -BHC (b-hexachloro-cyclohexane)	Grab	08/14/18		0.043	
<i>delta</i> -BHC (d-hexachloro-cyclohexane)	Grab	08/14/18		0.011	U
<i>gamma</i> -BHC (g-hexachloro-cyclohexane, Lindane)	Grab	08/14/18		0.010	J
Chlordane	Grab	08/14/18		0.21	U
4,4'-DDD	Grab	08/14/18		0.013	U
4,4'-DDE	Grab	08/14/18		0.018	U
4,4'-DDT	Grab	08/14/18		0.014	U
Dieldrin	Grab	08/14/18		0.013	U
Endosulfan I (alpha)	Grab	08/14/18		0.0092	U
Endosulfan II (beta)	Grab	08/14/18		0.023	U
Endosulfan sulfate	Grab	08/14/18		0.014	U
Endrin	Grab	08/14/18		0.015	U
Endrin aldehyde	Grab	08/14/18		0.015	U
Heptachlor	Grab	08/14/18		0.0062	U
Heptachlor epoxide	Grab	08/14/18		0.012	U
Toxaphene	Grab	08/14/18		1.4	U
METALS by 200.8, TOTAL HARDNESS by 2340B, MERCURY by 245.1, & HEX CHROME by SM 3500-Cr-B					
Aluminum	Grab	08/14/18		59	U
Antimony	Grab	08/14/18		0.15	U
Arsenic	Grab	08/14/18		0.28	U
Beryllium	Grab	08/14/18		0.18	U
Cadmium	Grab	08/14/18		0.13	J
Chromium	Grab	08/14/18		2.6	J
Copper	Grab	08/14/18		2.5	J
Lead	Grab	08/14/18		0.20	U
Nickel	Grab	08/14/18		4.0	
Selenium	Grab	08/14/18		3.2	
Silver	Grab	08/14/18		0.10	U
Thallium	Grab	08/14/18		0.14	U
Hardness (total as CaCO ₃)	Grab	08/14/18		52.5 mg/ℓ	
Zinc	Grab	08/14/18		12	J
Mercury	Grab	08/14/18		0.13	U
Hexavalent chromium	Grab	08/14/18		5.1	U

MANHOLE MH-18 PRIORITY POLLUTANT SAMPLE AND ANALYTICAL RESULTS SUMMARY FOR 2018

Group Description and Analytical Method Analyte	Sample			Result (µg/ℓ)	Result Qualifier(s)
	Type ⁽¹⁾	Date			
SEMI-VOLATILE (BASE/NEUTRAL) COMPOUNDS by EPA 625					
Acenaphthene	Grab	08/14/18		0.92	U
Acenaphthylene	Grab	08/14/18		0.96	U
Benzidine	Grab	08/14/18		27.0	U
4-Bromophenylphenyl ether	Grab	08/14/18		0.48	U
Butylbenzylphthalate	Grab	08/14/18		0.73	U
4-Chloro-3-methylphenol	Grab	08/14/18		1.4	U
bis(2-Chloroethoxy)methane	Grab	08/14/18		0.97	U
bis(2-Chloroethyl) ether	Grab	08/14/18		0.71	U
bis(2-Chloroisopropyl) ether	Grab	08/14/18		1.1	U
2-Chloronaphthalene	Grab	08/14/18		1.0	U
2-Chlorophenol	Grab	08/14/18		0.99	U
4-Chlorophenylphenyl ether	Grab	08/14/18		0.91	U
1,2-Dichlorobenzene	Grab	08/14/18		1.8	U
1,3-Dichlorobenzene	Grab	08/14/18		1.6	U
1,4-Dichlorobenzene	Grab	08/14/18		1.9	U
3,3'-Dichlorobenzidine	Grab	08/14/18		1.3	U
2,4-Dichlorophenol	Grab	08/14/18		1.1	U
Diethylphthalate	Grab	08/14/18		0.52	U
2,4-Dimethylphenol	Grab	08/14/18		0.90	U
Dimethylphthalate	Grab	08/14/18		0.70	U
Di-n-butylphthalate	Grab	08/14/18		0.91	U
4,6-Dinitro-2-methylphenol	Grab	08/14/18		0.60	U
2,4-Dinitrophenol	Grab	08/14/18		0.83	U
2,4-Dinitrotoluene	Grab	08/14/18		0.96	U
2,6-Dinitrotoluene	Grab	08/14/18		1.5	U
Di-n-octylphthalate	Grab	08/14/18		1.4	U
1,2-Diphenylhydrazine	Grab	08/14/18		1.2	U
bis(2-Ethylhexyl)phthalate	Grab	08/14/18		0.74	U
Hexachloro-1,3-butadiene	Grab	08/14/18		1.7	U
Hexachlorobenzene	Grab	08/14/18		0.55	U
Hexachlorocyclopentadiene	Grab	08/14/18		0.86	U
Hexachloroethane	Grab	08/14/18		1.4	U
Isophorone	Grab	08/14/18		0.99	U
Naphthalene	Grab	08/14/18		0.68	U
Nitrobenzene	Grab	08/14/18		0.99	U
2-Nitrophenol	Grab	08/14/18		0.82	U
4-Nitrophenol	Grab	08/14/18		0.57	U
N-Nitrosodimethylamine	Grab	08/14/18		1.1	U
N-Nitroso-di-n-propylamine	Grab	08/14/18		0.98	U
N-Nitrosodiphenylamine	Grab	08/14/18		2.1	U
Pentachlorophenol	Grab	08/14/18		0.72	U
Phenol	Grab	08/14/18		0.52	U
1,2,4,5-Tetrachlorobenzene	Grab	08/14/18		1.1	U
1,2,4-Trichlorobenzene	Grab	08/14/18		1.4	U
2,4,5-Trichlorophenol	Grab	08/14/18		0.73	U
2,4,6-Trichlorophenol	Grab	08/14/18		1.0	U
PAHs by EPA 625 SIM					
Anthracene	Grab	08/14/18		0.0036	U
Benzo(a)anthracene	Grab	08/14/18		0.0046	U
Benzo(a)pyrene	Grab	08/14/18		0.0040	U

MANHOLE MH-18 PRIORITY POLLUTANT SAMPLE AND ANALYTICAL RESULTS SUMMARY FOR 2018

Group Description and Analytical Method Analyte	Sample			Result (µg/ℓ)	Result Qualifier(s)
	Type ⁽¹⁾	Date			
Benzo(b)fluoranthene	Grab	08/14/18		0.0048	U
Benzo(g,h,i)perylene	Grab	08/14/18		0.0032	U
Benzo(k)fluoranthene	Grab	08/14/18		0.0051	U
Chrysene	Grab	08/14/18		0.0038	U
Dibenzo(a,h)anthracene	Grab	08/14/18		0.0050	U
Fluoranthene	Grab	08/14/18		0.0085	U
Fluorene (86-73-7)	Grab	08/14/18		0.027	J
Indeno(1,2,3-cd)pyrene	Grab	08/14/18		0.0032	U
Phenanthrene	Grab	08/14/18		0.0078	J
Pyrene	Grab	08/14/18		0.0069	U
VOLATILE ORGANIC COMPOUNDS (VOCs) by EPA 624					
1,1,1-Trichloroethane	Grab	08/14/18		0.71	J
1,1,2,2-Tetrachloroethane	Grab	08/14/18		0.25	U
1,1,2-Trichloroethane	Grab	08/14/18		0.20	U
1,1-Dichloroethane	Grab	08/14/18		0.24	U
1,1-Dichloroethene	Grab	08/14/18		0.41	U
1,1-Dichloropropene	Grab	08/14/18		0.44	U
1,2-Dichloroethane	Grab	08/14/18		0.17	U
1,2-Dichloropropane	Grab	08/14/18		0.23	U
2,3-Dichloropropene	Grab	08/14/18		0.50	U
2-Chloroethylvinyl ether	Grab	08/14/18		1.9	U
Acrolein	Grab	08/14/18		10.0	U
Acrylonitrile	Grab	08/14/18		2.3	U
Benzene	Grab	08/14/18		0.50	U
Bromodichloromethane	Grab	08/14/18		0.50	U
Bromoform	Grab	08/14/18		0.50	U
Bromomethane	Grab	08/14/18		2.4	U
Carbon tetrachloride	Grab	08/14/18		0.50	U
Chlorobenzene	Grab	08/14/18		0.50	U
Chloroethane	Grab	08/14/18		0.37	U
Chloroform	Grab	08/14/18		2.5	U
Chloromethane	Grab	08/14/18		0.50	U
Dibromochloromethane	Grab	08/14/18		0.50	U
Ethylbenzene	Grab	08/14/18		0.50	U
Methylene chloride	Grab	08/14/18		0.23	U
Tetrachloroethene	Grab	08/14/18		0.50	U
Toluene	Grab	08/14/18		0.50	U
Trichloroethene	Grab	08/14/18		0.57	J
Vinyl chloride	Grab	08/14/18		0.18	U
cis-1,2-Dichloroethene	Grab	08/14/18		0.26	U
cis-1,3-Dichloropropene	Grab	08/14/18		0.50	U
trans-1,2-Dichloroethene	Grab	08/14/18		0.26	U
trans-1,3-Dichloropropene	Grab	08/14/18		0.23	U

NOTES:

Results are in micrograms per liter (µg/ℓ) except Hardness is in milligrams per liter (mg/ℓ) as shown.

J = Estimated concentration below laboratory quantification level.

U = Parameter not detected at or above the indicated value, which is the detection limit.

FOOTNOTE:

(1) Grab samples were collected as approved by the Wisconsin Department of Natural Resources.

NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

ANNUAL DISCHARGE MONITORING RESULTS FOR 2019

Substance/Parameter	Sample ⁽¹⁾				Discharge Limits		Result Qualifier(s)
	Frequency	Type	Results	Units	Daily Maximum	Weekly Average	
Cadmium (Cd), dissolved ⁽²⁾	Annual	Grab	1.3	µg/L	240		U
		Calculated ⁽³⁾	0.0028	lb/day		0.22	U
pH (field)	Annual	Grab	7.1	su	6 to 9		
Temperature (field)	Annual	Grab	54	°F			

NOTE:

U = Parameter not detected at or above the indicated value, which is the detection limit for measured concentrations or a flow-weighted number for calculated levels. The calculated mass discharge rate, which is based on the detection limit, is U flagged also.

FOOTNOTES:

- (1) Samples collected from manhole MH-18 on 8/19/19. Average flow rate in 2019 = 180 gallons per minute (gpm).
- (2) Sample was field filtered (along with the monitoring well samples) and analyzed for dissolved instead of total recoverable Cd. Historically, dissolved and total recoverable Cd concentrations have been comparable at this site, as summarized in Eder Associates' (nka Gannett Fleming, Inc.) July 1996 report on file with the WDNR.
- (3) Calculated mass discharge rate based on the estimated average flow and reported Cd concentration, as shown below.

$$\frac{180 \text{ gal}}{\text{min}} \times \frac{3.785 \text{ L}}{1 \text{ gal}} \times \frac{1,440 \text{ min}}{1 \text{ day}} \times \frac{1 \text{ lb}}{4.54 \times 10^8 \text{ } \mu\text{g}} \times \frac{1.3 \text{ } \mu\text{g}}{\text{L}} = 0.0028 \text{ lb/day dissolved Cd}$$

NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

ANNUAL DISCHARGE MONITORING RESULTS FOR 2020

Substance/Parameter	Sample ⁽¹⁾				Discharge Limits		Result Qualifier(s)
	Frequency	Type	Results	Units	Daily Maximum	Weekly Average	
Total cadmium (Cd)	Annual	Grab	1.3	µg/L	240		U
		Calculated ⁽²⁾	0.0027	lb/day		0.22	U
pH (field)	Annual	Grab	7.4	su	6 to 9		
Temperature (field)	Annual	Grab	55	°F			

NOTE:

U = Parameter not detected at or above the indicated value, which is the detection limit for measured concentrations or a flow-weighted number for calculated levels. The calculated mass discharge rate, which is based on the detection limit, is U flagged also.

FOOTNOTES:

- (1) Samples collected from manhole MH-18 on 8/24/20. Average flow rate in 2020 = 175 gallons per minute (gpm).
- (2) Calculated mass discharge rate based on the estimated average flow and reported Cd concentration, as shown below.

$$\frac{175 \text{ gal}}{\text{min}} \times \frac{3.785 \text{ L}}{1 \text{ gal}} \times \frac{1,440 \text{ min}}{1 \text{ day}} \times \frac{1 \text{ lb}}{4.54 \times 10^8 \text{ µg}} \times \frac{1.3 \text{ µg}}{\text{L}} = 0.0027 \text{ lb/day total Cd}$$

NATIONAL PRESTO INDUSTRIES, INC.
EAU CLAIRE, WISCONSIN

ANNUAL DISCHARGE MONITORING RESULTS FOR 2021

Substance/Parameter	Sample ⁽¹⁾				Discharge Limits		Result Qualifier(s)
	Frequency	Type	Results	Units	Daily Maximum	Weekly Average	
Total cadmium (Cd)	Annual	Grab	1.3	µg/L	240		U
		Calculated ⁽²⁾	0.0026	lb/day		0.22	U
pH (field)	Annual	Grab	7.1	su	6 to 9		
Temperature (field)	Annual	Grab	58	°F			

NOTE:

U = Parameter not detected at or above the indicated value, which is the detection limit for measured concentrations or a flow-weighted number for calculated levels. The calculated mass discharge rate, which is based on the detection limit, is U flagged also.

FOOTNOTES:

- (1) Samples collected from manhole MH-18 on 8/31/21. Average flow rate in 2021 = 169 gallons per minute (gpm).
- (2) Calculated mass discharge rate based on the estimated average flow and reported Cd concentration, as shown below.

$$\frac{169 \text{ gal}}{\text{min}} \times \frac{3.785 \text{ L}}{1 \text{ gal}} \times \frac{1,440 \text{ min}}{1 \text{ day}} \times \frac{1 \text{ lb}}{4.54 \times 10^8 \text{ } \mu\text{g}} \times \frac{1.3 \text{ } \mu\text{g}}{\text{L}} = 0.0026 \text{ lb/day total Cd}$$

APPENDIX E



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD (SR-6J)
CHICAGO, ILLINOIS 60604-3590

REPLY TO THE ATTENTION OF: SR-6J

July 19, 2021

Ms. Candace Sykora
Wisconsin Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701

Re: Notification of Five Year Review Start for the National Presto Industries Superfund Site

Dear Ms. Sykora:

This letter is to confirm that U.S. EPA and the Wisconsin Department of Natural Resources (WDNR) has begun the process of the Five Year Review for the National Presto Industries Superfund site (NPI). U.S. EPA will lead the NPI Five Year Review.

The Five Year Review for NPI is statutorily due on July 19, 2022. It is appropriate that U.S. EPA and WDNR provide key parties with at least a six month notification so that we can begin the necessary coordination activities. Necessary activities include notifying the public, accepting public input, gathering data, arranging for site visits, and developing any pertinent recommendations, etc. I will be contacting you to set up a time to conduct the site visit within the next few months.

I look forward to working with the WDNR, NPI and Gannett Fleming in compiling the Five Year Review report for the NPI Superfund site. If you have any questions, please feel free to call me at 312 886 5251 or email me at sullivan.sheila@epa.gov.

Sincerely,

Sheila Sullivan

Sheila Sullivan
Remedial Project Manager
U.S. EPA Region 5

cc: B. Eleder, Five Year Review Coordinator (SR-6J), via email
K. Adler, Section Chief (SR-6J), via email
P. Cannon, Chief, Community Involvement and Outreach (SI-7J), via email
E. Weiler, Associate Regional Counsel (C-14J), via email
D. Paul, National Presto Industries, via email
C. Wright, Gannett Fleming, via email
C. Payne, Gannett Fleming, via email

APPENDIX F

Wisconsin Legals

U.S. EPA Begins Review of National Presto Industries Superfund Site Eau Claire, Wisconsin

U.S. Environmental Protection Agency is conducting a five-year review of the National Presto Industries Superfund Site, 3925 N. Hastings Way, Eau Claire. Superfund law requires regular reviews of sites with waste managed on site that have been cleaned up to ensure that the cleanup continues to protect people and the environment. This is the sixth five-year review of the site.

EPA's cleanup of contaminated soil and groundwater at the National Presto Industries Superfund Site included constructing a permanent water supply system, installing groundwater extraction wells, treating the extracted water using cas-

Wisconsin Legals

cade aeration units, excavating waste forge compounds, installing soil vapor extraction systems, pumping and treating contaminated groundwater, and monitoring.

Additional information is available at the Chippewa Falls Public Library, 105 W Central Street, and at <https://curnulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0505009>

The review should be completed by July 2022.

The five-year report is an opportunity for residents to share their concerns about the site with the EPA.

For more information, contact:
Francisco Arcaute, Community
Involvement Coordinator,

Need to see that ad again? Find it here:
7RiversMarketplace.com

Wisconsin Legals

arcaute.francisco@epa.gov,
312-886-7613
Glenn Lautenbach,
Remedial Project Manager,
Lautenbach.glenn@epa.gov,
312-353-8892.

3/30 LAC 98089

WNAXLP

APPENDIX G

Site Inspection Checklist

I. SITE INFORMATION	
Site name: National Presto Industries, Inc.	Date of inspection: 5/3/2022
Location and Region: Eau Claire, Wisconsin Region 5	EPA ID: WID006196174
Agency, office, or company leading the FYR: EPA	Weather/temperature: 50's Sunny
Remedy Includes: (Check all that apply)	
<input checked="" type="checkbox"/> Landfill cover/containment	<input type="checkbox"/> Monitored natural attenuation
<input type="checkbox"/> Access controls	<input type="checkbox"/> Groundwater containment
<input checked="" type="checkbox"/> Institutional controls	<input type="checkbox"/> Vertical barrier walls
<input checked="" type="checkbox"/> Groundwater pump and treatment	<input checked="" type="checkbox"/> Other: SVE Systems
<input type="checkbox"/> Surface water collection and treatment	
Attachments:	
<input type="checkbox"/> Inspection team roster attached	<input type="checkbox"/> Site map attached

Site Inspection Checklist

III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)			
1. O&M Documents			
<input type="checkbox"/> O&M manual	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> As-built drawings	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
<input checked="" type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks: Click or tap here to enter text.			
2. Site-Specific Health and Safety Plan			
<input type="checkbox"/> Contingency Plan/Emergency Response Plan		<input type="checkbox"/> Readily available	
Remarks: Click or tap here to enter text.			
3. O&M and OSHA Training Records			
<input type="checkbox"/> Readily available		<input type="checkbox"/> Up to date	
Remarks: Click or tap here to enter text.			
4. Permits and Service Agreements			
<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
<input type="checkbox"/> Effluent discharge	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
<input type="checkbox"/> Other permits: Click or tap here to enter text.			
Remarks: Limits included in monitoring reports.			
5. Gas Generation Records			
<input type="checkbox"/> Readily available		<input checked="" type="checkbox"/> Up to date	
Remarks: SVE reports submitted to Agencies			
6. Settlement Monument Records			
<input type="checkbox"/> Readily available		<input type="checkbox"/> Up to date	
Remarks: Click or tap here to enter text.			
7. Groundwater Monitoring Records			
<input type="checkbox"/> Readily available		<input checked="" type="checkbox"/> Up to date	
Remarks: Submitted to Agencies			
8. Leachate Extraction Records			
<input type="checkbox"/> Readily available		<input type="checkbox"/> Up to date	
Remarks: Click or tap here to enter text.			

Site Inspection Checklist

9. Discharge Compliance Records			
<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
<input type="checkbox"/> Water (effluent)	<input type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks: Submitted to Agencies			
10. Daily Access/Security Logs			
	<input type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks: Sign-in / Sign-out located in offices			
IV. O&M COSTS			
1. O&M Organization			
<input type="checkbox"/> State in-house	<input type="checkbox"/> Contractor for State		
<input checked="" type="checkbox"/> PRP in-house	<input checked="" type="checkbox"/> Contractor for PRP		
<input type="checkbox"/> Federal Facility in-house	<input type="checkbox"/> Contractor for Federal Facility		
Remarks: Click or tap here to enter text.			
2. O&M Cost Records			
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> Funding mechanism/agreement in place	
Original O&M cost estimate Click or tap here to enter text.			<input type="checkbox"/> Breakdown attached
Total annual cost by year for review period if available			
From Click or tap to enter a date.	To Click or tap to enter a date.	Total cost Click or tap here to enter text.	<input type="checkbox"/> Breakdown attached
From Click or tap to enter a date.	To Click or tap to enter a date.	Total cost Click or tap here to enter text.	<input type="checkbox"/> Breakdown attached
From Click or tap to enter a date.	To Click or tap to enter a date.	Total cost Click or tap here to enter text.	<input type="checkbox"/> Breakdown attached
From Click or tap to enter a date.	To Click or tap to enter a date.	Total cost Click or tap here to enter text.	<input type="checkbox"/> Breakdown attached
From Click or tap to enter a date.	To Click or tap to enter a date.	Total cost Click or tap here to enter text.	<input type="checkbox"/> Breakdown attached
3. Unanticipated or Unusually High O&M Costs During Review Period			
Describe costs and reasons:			
Click or tap here to enter text.			

Site Inspection Checklist

V. ACCESS AND INSTITUTIONAL CONTROLS			
<input checked="" type="checkbox"/> Applicable		<input type="checkbox"/> N/A	
1. Fencing Damaged	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Gates secured	<input type="checkbox"/> N/A
Remarks: Small damage to the fence from a fallen tree branch identified on the Eastern portion of Site. PRP indicated damage was recent and repair is planned.			
2. Other Access Restrictions	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Gates secured	
Remarks: Security that monitors the Site.			
3. Institutional Controls (ICs)			
A. Implementation and Enforcement			
Site conditions imply ICs not properly implemented	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Site conditions imply ICs not being fully enforced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Type of monitoring (<i>e.g.</i> , self-reporting, drive by)	Click or tap here to enter text.		
Frequency	Click or tap here to enter text.		
Responsible party/agency	Click or tap here to enter text.		
Contact: Name _____, Title _____, Click or tap to enter a date., P: Phone Number _____			
Reporting is up-to-date	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Reports are verified by the lead agency	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Specific requirements in deed or decision documents have been met	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Violations have been reported	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Other problems or suggestions:			
Click or tap here to enter text.			
B. Adequacy	<input checked="" type="checkbox"/> ICs are adequate	<input type="checkbox"/> ICs are inadequate	<input type="checkbox"/> N/A
Remarks: Click or tap here to enter text.			
4. General			
A. Vandalism/Trespassing	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> No vandalism evident	
Remarks: Click or tap here to enter text.			
B. Land use changes on site	<input checked="" type="checkbox"/> N/A		
Remarks: Click or tap here to enter text.			
C. Land use changes off site	<input checked="" type="checkbox"/> N/A		
Remarks: Click or tap here to enter text.			

Site Inspection Checklist

VI. GENERAL SITE CONDITIONS			
1. Roads	<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A	
A. Roads damaged	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Roads adequate	<input type="checkbox"/> N/A
Remarks: Click or tap here to enter text.			
B. Other Site Conditions	Remarks: Click or tap here to enter text.		
VII. LANDFILL COVERS			
1. Landfill Surface	<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A	
A. Settlement (Low Spots)	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Settlement Not Evident	
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.	
Remarks: Small spots with settlement/erosion issues noted.			
B. Cracks	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> Cracking Not Evident	
Lengths: Click or tap here to enter text.	Widths: Click or tap here to enter text.	Depths: Click or tap here to enter text.	
Remarks: Click or tap here to enter text.			
C. Erosion	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Erosion Not Evident	
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.	
Remarks: Small spots with settlement/erosion issues noted.			
D. Holes	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> Holes Not Evident	
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.	
Remarks: Click or tap here to enter text.			
E. Vegetative Cover	<input checked="" type="checkbox"/> Grass	<input type="checkbox"/> Cover Properly Established	
<input type="checkbox"/> Tress/Shrubs (indicate size and locations on a diagram)		<input type="checkbox"/> No Signs of Stress	
Remarks: Click or tap here to enter text.			
F. Alternative Cover (armored rock, concrete, etc.)	<input type="checkbox"/> N/A		
Remarks: Click or tap here to enter text.			
G. Bulges	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> Bulges Not Evident	
Areal Extent: Click or tap here to enter text.		Height: Click or tap here to enter text.	
Remarks: Click or tap here to enter text.			
H. Wet Areas/Water Damage	<input checked="" type="checkbox"/> Wet Areas/Water Damage Not Evident		

Site Inspection Checklist

<input type="checkbox"/> Wet Areas	<input type="checkbox"/> Location Shown on Site Map	Areal Extent: Click or tap here to enter text.
<input type="checkbox"/> Ponding	<input type="checkbox"/> Location Shown on Site Map	Areal Extent: Click or tap here to enter text.
<input type="checkbox"/> Seeps	<input type="checkbox"/> Location Shown on Site Map	Areal Extent: Click or tap here to enter text.
<input type="checkbox"/> Soft Subgrade	<input type="checkbox"/> Location Shown on Site Map	Areal Extent: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
I. Slope Instability	<input type="checkbox"/> Location Shown on Site Map <input type="checkbox"/> Slides	<input checked="" type="checkbox"/> Slope Instability Not Evident Areal Extent: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
2. Benches	<input type="checkbox"/> Applicable	<input type="checkbox"/> N/A
(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)		
A. Flows Bypass Bench	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> N/A or Okay
Remarks: Click or tap here to enter text.		
B. Bench Breached	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> N/A or Okay
Remarks: Click or tap here to enter text.		
C. Bench Overtopped	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> N/A or Okay
Remarks: Click or tap here to enter text.		
3. Letdown Channels	<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)		
A. Settlement	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Settlement Not Evident
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
B. Material Degradation	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Degradation Not Evident
Material Type: Click or tap here to enter text.		Areal Extent: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
C. Erosion	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Erosion Not Evident

Site Inspection Checklist

Areal Extent: Click or tap here to enter text. Remarks: Click or tap here to enter text.	Depth: Click or tap here to enter text.
D. Undercutting <input type="checkbox"/> Location Shown on Site Map <input type="checkbox"/> Undercutting Not Evident Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text. Remarks: Click or tap here to enter text.	
E. Obstructions <input type="checkbox"/> Location Shown on Site Map <input type="checkbox"/> Undercutting Not Evident Type: Click or tap here to enter text. Areal Extent: Click or tap here to enter text. Size: Click or tap here to enter text. Remarks: Click or tap here to enter text.	
F. Excessive Vegetative Growth <input type="checkbox"/> Location Shown on Site Map <input type="checkbox"/> Excessive Growth Not Evident Areal Extent: Click or tap here to enter text. <input type="checkbox"/> Vegetation in channels does not obstruct flow Remarks: Click or tap here to enter text.	
4. Cover Penetrations <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A	
A. Gas Vents <input checked="" type="checkbox"/> Active <input type="checkbox"/> Passive <input type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
B. Gas Monitoring Probes <input checked="" type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
C. Monitoring Wells <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Evidence of leakage at penetration <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
D. Leachate Extraction Wells	

Site Inspection Checklist

<input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks: Click or tap here to enter text.	<input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input type="checkbox"/> Evidence of leakage at penetration <input checked="" type="checkbox"/> N/A
E. Settlement Monuments <input type="checkbox"/> Located <input type="checkbox"/> Routinely Surveyed <input checked="" type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
5. Gas Collection and Treatment <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A	
A. Gas Treatment Facilities <input type="checkbox"/> Flaring <input type="checkbox"/> Thermal Destruction <input type="checkbox"/> Collection for Reuse <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks: SVE systems	
B. Gas Collection Wells, Manifolds, and Piping <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
C. Gas Monitoring Facilities (e.g. gas monitoring of adjacent homes or buildings) <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
6. Cover Drainage Layer <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A	
A. Outlet Pipes Inspected <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
B. Outlet Rock Inspected <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks: Click or tap here to enter text.	
7. Detention/Sediment Ponds <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A	
A. Siltation <input checked="" type="checkbox"/> Siltation Not Evident <input type="checkbox"/> N/A Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text. Remarks: Click or tap here to enter text.	
B. Erosion <input checked="" type="checkbox"/> Erosion Not Evident Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text. Remarks: Click or tap here to enter text.	
C. Outlet Works <input type="checkbox"/> Functioning <input checked="" type="checkbox"/> N/A	

Site Inspection Checklist

Remarks: Click or tap here to enter text.		
D. Dam	<input type="checkbox"/> Functioning	<input checked="" type="checkbox"/> N/A
Remarks: Click or tap here to enter text.		
8. Retaining Walls	<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
A. Deformations	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Deformation Not Evident
Horizontal Displacement: Click or tap here to enter text.		
Vertical Displacement: Click or tap here to enter text.		
Rotational Displacement: Click or tap here to enter text.		
Remarks: Click or tap here to enter text.		
B. Degradation	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Deformation Not Evident
Remarks: Click or tap here to enter text.		
9. Perimeter Ditches/Off-Site Discharge	<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
A. Siltation	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> Siltation Not Evident
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
B. Vegetative Growth	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> N/A
<input checked="" type="checkbox"/> Vegetation Does Not Impede Flow		
Areal Extent: Click or tap here to enter text.		Type: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
C. Erosion	<input type="checkbox"/> Location Shown on Site Map	<input checked="" type="checkbox"/> Erosion Not Evident
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
D. Discharge Structure	<input checked="" type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: Click or tap here to enter text.		
VIII. VERTICAL BARRIER WALLS		
<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A	
1. Settlement	<input type="checkbox"/> Location Shown on Site Map	<input type="checkbox"/> Settlement Not Evident
Areal Extent: Click or tap here to enter text.		Depth: Click or tap here to enter text.
Remarks: Click or tap here to enter text.		
2. Performance Monitoring	Type of Monitoring: Click or tap here to enter text.	

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<input type="checkbox"/> Performance Not Monitored Frequency: Click or tap here to enter text. Remarks: Click or tap here to enter text.	<input type="checkbox"/> Evidence of Breaching Head Differential: Click or tap here to enter text.
IX. GROUNDWATER/SURFACE WATER REMEDIES	
<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1. Groundwater Extraction Wells, Pumps, and Pipelines	<input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A
A. Pumps, Wellhead Plumbing, and Electrical <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good Condition <input checked="" type="checkbox"/> All Required Wells Properly Operating <input type="checkbox"/> Needs Maintenance Remarks: Click or tap here to enter text.	
B. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances <input checked="" type="checkbox"/> Good Condition <input type="checkbox"/> Needs Maintenance Remarks: Click or tap here to enter text.	
C. Spare Parts and Equipment <input type="checkbox"/> Needs to be Provided <input type="checkbox"/> Readily Available <input type="checkbox"/> Good Condition <input type="checkbox"/> Requires Upgrade Remarks: Click or tap here to enter text.	
2. Surface Water Collection Structures, Pumps, and Pipelines	<input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A
A. Collection Structures, Pumps, and Electrical <input type="checkbox"/> Good Condition <input type="checkbox"/> Needs Maintenance Remarks: Click or tap here to enter text.	
B. Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances <input type="checkbox"/> Good Condition <input type="checkbox"/> Needs Maintenance Remarks: Click or tap here to enter text.	
C. Spare Parts and Equipment <input type="checkbox"/> Needs to be Provided <input type="checkbox"/> Readily Available <input type="checkbox"/> Good Condition <input type="checkbox"/> Requires Upgrade Remarks: Click or tap here to enter text.	
3. Treatment System	<input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A
A. Treatment Train (Check components that apply) <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/Water Separation <input type="checkbox"/> Bioremediation <input checked="" type="checkbox"/> Air Stripping <input type="checkbox"/> Carbon Absorbers <input type="checkbox"/> Filters Click or tap here to enter text.	

Site Inspection Checklist

- Additive (e.g. chelation agent, flocculent) Click or tap here to enter text.
 - Others Click or tap here to enter text.
 - Good Condition Needs Maintenance
 - Sampling ports properly marked and functional
 - Sampling/maintenance log displayed and up to date
 - Equipment properly identified
 - Quantity of groundwater treated annually Click or tap here to enter text.
 - Quantity of surface water treated annually Click or tap here to enter text.
- Remarks: Sampling and discharge reports submitted to agencies.

B. Electrical Enclosures and Panels (properly rated and functional)

- N/A Good Condition Needs Maintenance
- Remarks: Click or tap here to enter text.

C. Tanks, Vaults, Storage Vessels

- N/A Good Condition Needs Maintenance
 - Proper Secondary Containment Good Condition Needs Maintenance
- Remarks: Click or tap here to enter text.

D. Discharge Structure and Appurtenances

- N/A Good Condition Needs Maintenance
- Remarks: Click or tap here to enter text.

E. Treatment Building(s)

- N/A Good condition (esp. roof and doorways)
 - Needs repair Chemicals and equipment properly stored
- Remarks Click or tap here to enter text.

F. Monitoring Wells (Pump and Treatment Remedy)

- Properly secured/locked Functioning N/A
 - Routinely sampled All required wells located
 - Good condition Needs Maintenance
- Remarks Click or tap here to enter text.

4. Monitoring Data

A. Monitoring Data:

- Is Routinely Submitted on Time Is of Acceptable Quality

Site Inspection Checklist

B. Monitoring Data Suggests:

- Groundwater plume is effectively contained Contaminant concentrations are declining

5. Monitored Natural Attenuation

A. Monitoring Wells (natural attenuation remedy)

N/A

- Properly secured/locked Functioning Routinely sampled
 All required wells located Needs Maintenance Good condition

Remarks: [Click or tap here to enter text.](#)

X. OTHER REMEDIES

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

XI. OVERALL OBSERVATIONS

1. Implementation of the Remedy

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

No issues or observations identified regarding the implementation of the remedy. The current remedy as functioning is completing the objectives of eliminating contamination in the groundwater.

2. Adequacy of O&M

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy. O&M procedures seem adequate for the Site. PRP completes and submits O&M reports in a timely manner and according to schedule.

3. Early Indicators of Potential Remedy Problems

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.

No issues or observations that suggest the protectiveness of the remedy may be compromised in the future.

4. Early Indicators of Potential Remedy Problems

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

No recommendations for optimization opportunities.