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**Subject:** 4/15/2024 update on the trial shutdown of EW-6 at NPI (34283.000)  
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Glenn- Thanks again for taking my call about the National Presto Industries (NPI) Superfund site in Eau Claire, WI (BRRTS#02-09-000267) on Fri/Apr 12. Per our phone conversation, an informal summary of the ongoing trial shutdown of extraction well EW-6 at NPI follows. Please see Gannett Fleming, Inc.'s (GF's) January 2023 *Work Plan for a 12-Month Trial Shutdown of Extraction Well EW-6* for details.

On February 23, 2023, the pump in EW-6 was turned off to start its 12-month trial shutdown, as approved by the USEPA and Wisconsin Department of Natural Resources (WDNR). The volatile organic compound (VOC) of primary concern in the groundwater (GW) is trichloroethylene (TCE). The electric submersible pump in EW-6 is temporarily restarted for NPI VOC grab sampling on a quarterly basis. Related quarterly operating and GW sampling information is summarized in the following table.

Date	TCE Concentration (µg/l)	Description/Comments
8/30/22	0.99 JA	Routine Q3 monitoring in 2022 with EW-6 running 24/7/365.
12/5/22	Not applicable	No sample collected during Q4 2022 monitoring; EW-6 was being redeveloped.
2/23/23	"	Start 12-month trial shutdown of EW-6, as agreed; no sample collected.
3/21/23	<0.32 A	1st sample set on Day 26 of trial shutdown, after 5-min/900-gal purge (Q1 monitoring).
6/13/23	2.7 A	2nd sample set on Day 110, after 5-min/900-gal purge (Q2 monitoring).
8/29/23	2.55 A	Q3 2023 monitoring (1 of 2) on Day 187, after 5-min/900-gal purge
8/30/23	1.5	Q3 2023 monitoring (2 of 2) on Day 188, after 22-hr & 20-min/241,200-gal purge.
11/30/23	2.6 A	Q4 2023 monitoring (1 of 2) on Day 280, after 10-min/1,800-gal purge.
12/1/23	1.3	Q4 2023 monitoring (2 of 2) on Day 281, after 22-hr & 35-min/243,900-gal purge.
3/27/24	2.0 A	Q1 2024 monitoring (1 of 2) on Day 398, after 10-min/1,800-gal purge.
3/28/24	1.1	Q1 2024 monitoring (2 of 2) on Day 399, after 24-hr & 15-min/261,900-gal purge.

NOTES:

EW-6 is 6-inch diameter & had, on average, a static water column of 30 ft in 2023. Hence, its casing volume=approx. 44 gal.

A = Average of original sample and duplicate. Began this approach in 2014.

J = Estimated concentration below laboratory quantitation level.

Per Page 5 of GF's Jan 2023 workplan, GW trigger thresholds for the restarting of EW-6 were described. If TCE rebound occurs at or above a proposed threshold concentration of 2.5 µg/l [i.e., 50 percent of TCE's 5.0 µg/l Maximum Contaminant Level/NR 140 Enforcement Standard (MCL/ES)] in:

- EW-6 and/or MW-76A for two consecutive quarters or 5.0 µg/l in one quarter.
- The MW-77 well nest.

Subsequently, EW-6 has been the only well with temporary TCE rebound above the 2.5 µg/l threshold, as we've discussed.

- TCE concentrations of 2.7, 2.55, and 2.6 µg/l on 6/13/23, 8/29/23, and 11/30/23, respectively, were above the 2.5 µg/l threshold but below its 5.0 µg/l MCL/ES. In addition, the TCE concentration decreased to 1.5 and 1.3 µg/l on 8/30/23 and 12/1/23, respectively, documenting that the observed rebound is due in part to back diffusion of TCE from residual organic material in and around the EW-6 well bore. NPI and GF believe that a portion of the organic material is from residual fuel oil contamination related to the NPI leaking underground storage tank (LUST) site (WDNR BRRTS #03-09-001038) defined by former monitoring well PW-1, which was located approximately 180 ft east of the main building and 90 ft west of MW-11A. Following several years of active remediation, the LUST site was closed in Oct 1999 based on documentation prepared by GF (fka Eder Associates).

- TCE concentrations in samples collected from MW-76A and MW-77A/B/C were:
  - <0.32A, 0.52J, 2.1, and 1.0J µg/l, respectively, on 3/21/23.
  - 0.56JA, 0.87J, 1.9A, and 0.55J µg/l, respectively, on 6/13/23.
  - 1.2A, 0.63J, 1.5, and 0.45J µg/l, respectively, on 8/29/23.
  - 1.75A, 0.47J, 1.4, and 0.58J µg/l, respectively, on 11/30/23.
  - 1.7A, <0.32, 1.5, and 0.56J µg/l, respectively, on 3/27/24.

Based on overall results, EW-6 has remained offline and NPI proposes to proceed with the trial shutdown of EW-6, as outlined below, unless you disagree.

- Continue/extend the trial shutdown of EW-6 at least thru the second quarter (Q2) of 2024 (i.e., the next check will be when Q2 GW monitoring is conducted in Jun 2024).
- Submit a formal report to the agencies for review of the trial shutdown data thru Q1 2024 either as a standalone document by the end of April 2024 or in conjunction with the annual report for 2023 by the end of May 2024.

The formal report with the trial shutdown data will include supplemental info on the LUST site outlined above and provide the agencies with another opportunity to comment on NPI's proposed path forward for EW-6. You agreed to consider this option and review the idea with Erin when her schedule permits. Meanwhile, feel free to contact me if you have any questions. I left Erin a voicemail recently about this too.

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