From: Ramanauskas, Peter
To: Beggs, Tauren R - DNR
Subject: RE: then RE: Former Newton Pit - Remedial Action Options and Conceptual Design Report
Date: Wednesday, September 07, 2016 3:53:05 PM

Thank you, Tauren. Based on the information you have provided me, I believe we can proceed as follows under the MOA:

- Under the Type B designation in Attachment 1 of the MOA, the WDNR is not making a finding that the PCBs present in the NAPL at the site are presenting an unreasonable risk of injury to health or the environment based on existing site information and sampling data. Thus, the site will be managed by the WDNR under the NR700 rule series.
- You will ensure AECOM identifies how they will be disposing the PCB containing NAPL removed as part of source reduction in accordance with 761.61 requirements (i.e. as required by 761.61(b)(1)).
- EPA requests notification if additional PCB impacts are discovered at the site which may change the current finding of no unreasonable risk of injury to health or the environment (e.g. based on exposure or migration).

Thank you for checking in with me to confirm the site status under the MOA. Please let me know if you have additional questions.

Peter Ramanauskas
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Remediation and Reuse Branch
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USEPA Region 5
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(312) 886-7890

From: Beggs, Tauren R - DNR [mailto:Tauren.Beggs@wisconsin.gov]
Sent: Tuesday, September 06, 2016 3:44 PM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: RE: then RE: Former Newton Pit - Remedial Action Options and Conceptual Design Report

Hi Peter,

The primary risk to address for this case is the chlorinated solvents which have impacted soil, groundwater/drinking water supply, and surface water. WDNR has been regulating to ensure source reduction/remediation is addressed primarily to reduce/eliminate further migration of chlorinated solvents to groundwater and surface water receptors. The recently proposed remedial actions in the report I sent you include NAPL removal, soil vapor extraction, and a groundwater treatment pond, all of which address the removal and/or volatilization of volatile organic compounds. The NAPL is a mixture of chlorinated compounds, petroleum compounds, PAHs, and PCBs. Based on sample data, the semi- and non-volatiles are caught up in the source area and have

not migrated down gradient. It appears minimal petroleum compounds migrated down gradient. O&M will focus primarily on long-term monitoring of chlorinated solvents to show reduction in contaminant concentrations. Petroleum compounds, PAHs, and PCBs may be analyzed for a confirmation basis that they continue not to be mobile, but will likely not be required for long term monitoring (O&M).

I hope this meets your needs for confirmation from the WDNR. If you need anything else, please let me know.

Thanks,

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From: Ramanauskas, Peter [mailto:ramanauskas.peter@epa.gov]
Sent: Tuesday, September 06, 2016 1:58 PM
To: Beggs, Tauren R - DNR
Subject: Re: then RE: Former Newton Pit - Remedial Action Options and Conceptual Design Report

Hello Tauren,

In follow up to our call with Dave last week, can you send me an email to confirm that WDNR is taking action and directing source reduction/remediation on the LNAPL to address the non-PCB impacts to groundwater from that source (i.e. WDNR is not directing the action because of PCB risk concerns).

Additionally, do you anticipate you will include analysis of PCB in groundwater as part of the O&M stage of the project?

Thanks,
Peter