

From: Beggs, Tauren R - DNR
Sent: Wednesday, October 30, 2019 8:31 AM
To: 'Rodriguez, Gabriel M.'
Cc: Loring, David M.
Subject: FW: Former Newton Pit - Expanded Potable Well Sampling WP - PFAS

Hi Gabriel,

For Newell, I am forwarding the below recent correspondence to you regarding PFAS. This is DNR's response to the Expanded Downgradient Potable Well Sampling Work Plan that was submitted by AECOM, on behalf of the City of Manitowoc, on August 8, 2019.

If you have any questions, please let me know.

Regards,

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Tauren R. Beggs

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From: Beggs, Tauren R - DNR
Sent: Friday, October 25, 2019 7:26 AM
To: 'Henderson, Dave' <Dave.Henderson@aecom.com>
Cc: Kasdorf, James H Jr - DNR <James.KasdorfJr@wisconsin.gov>; 'GravelPit (GravelPit@manitowoc.org)' <GravelPit@manitowoc.org>
Subject: RE: Former Newton Pit - Expanded Potable Well Sampling WP - PFAS

Hi Dave,

Since VOCs are being found at this distance from the site, there is potential for PFAS to also have migrated similar distances. Refer to the comments below for PFAS work planning.

General Comments for PFAS work planning:

PFAS sampling needs to be conducted on the gravel pit site and off-site to expand the investigation and understand how PFAS is migrating through the environment. This includes any potentially impacted media such as soil, groundwater/drinking water, surface water, and sediment. It is unknown at this time if PFAS contaminants are migrating similar to VOCs. Based on the characteristics of PFAS, migration pathways may be different than VOCs. A work plan for PFAS needs to be submitted for the following:

- Sample the remaining existing monitoring wells and piezometers on-site and off-site that haven't been sampled for PFAS to date.
- Private wells should be sampled for PFAS either in tandem with the expanded downgradient potable well VOC sampling or after VOC sampling is completed to determine if PFAS is in groundwater/drinking water.

- Sample surface water in Silver Creek. The surface water sampling in the creek needs to be expanded off-site throughout the area similar to the expanded surface water sampling completed for VOCs back in 2014.

Soil and sediment also needs to be investigated, but higher priority should be targeted for surface water and groundwater since those are the primary routes of migration for PFAS.

If you have any questions, please let me know.

Regards,

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From: Beggs, Tauren R - DNR

Sent: Thursday, September 12, 2019 11:00 AM

To: 'Henderson, Dave' <Dave.Henderson@aecom.com>

Cc: Kasdorf, James H Jr - DNR <James.KasdorfJr@wisconsin.gov>; GravelPit (GravelPit@manitowoc.org) <GravelPit@manitowoc.org>

Subject: RE: Former Newton Pit - Expanded Potable Well Sampling WP

Hi Dave,

I have the following comment for the work plan:

- It is unclear if the property owners who were sampled by DNR at the end of 2017 who did not have detections above NR 140 standards are included in the work plan for this sample effort. These are indicated on Figure 1A by six yellow dots along S. 26th Street, Nelson Lane, and Elm Road. These property owners should be included for sampling since it has been over a year since they were last sampled and are in the area where the more recent detections in private wells were found.

Additional correspondence from DNR will be provided at a later date regarding work planning for PFAS on the gravel pit site and off-site. For statewide consistency, any correspondence regarding PFAS is being reviewed by specific DNR staff in Madison. Based on their work load, the earliest you may see this additional correspondence is next week, but I wanted to at least get the above comment for the work plan out to you within a reasonable period of time.

Regards,

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