

From: Beggs, Tauren R - DNR
Sent: Tuesday, June 16, 2020 3:23 PM
To: Henderson, Dave
Cc: GravelPit (GravelPit@manitowoc.org); Nobile, Trevor W - DNR; Chronert, Roxanne N - DNR (Roxanne.Chronert@wisconsin.gov)
Subject: RE: Newton Pit - Revised Emerging Contaminant Work Plan Update #1

Hi Dave,

Thanks for your comments, on behalf of the City, to the DNR's response. The DNR has no additional comments at this time to your comments below besides providing an answer to your question. The best example site/case I can provide as a situation that warranted additional site investigation after a "step out" style of site investigation was completed is the JCI/Tyco FTC (PFAS) open case, BRRTS # 02-38-580694. There are multiple site investigation reports available for this case on BRRTS on the Web where you can find information and data that supports the multiple migration pathways of PFAS which triggered the need for additional investigation beyond a typical "step-out" scenario.

If you have any questions, please feel free to contact me.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 366-5739 (Temporary Work Number)

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From: Henderson, Dave <Dave.Henderson@aecom.com>
Sent: Thursday, June 4, 2020 3:10 PM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Cc: GravelPit (GravelPit@manitowoc.org) <GravelPit@manitowoc.org>
Subject: RE: Newton Pit - Revised Emerging Contaminant Work Plan Update #1

Tauren,

Thank you for your responses to the March 18, 2020 PFAS workplan.

Our comments are provided in [blue text](#) after your responses, below.

Thanks

dsh

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From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>

Sent: Wednesday, May 13, 2020 12:04 PM

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

Cc: GravelPit (GravelPit@manitowoc.org) <GravelPit@manitowoc.org>

Subject: [EXTERNAL] RE: Newton Pit - Revised Emerging Contaminant Work Plan Update #1

Hi Dave,

I apologize for the delay in this response. DNR has reviewed the March 18, 2020, PFAS workplan and have the following additions/revisions:

General:

- A level IV laboratory analytical data package may be requested in the future to adequately review sampling results.
[City reply: Acknowledged.](#)
- Due to the characteristics of PFAS and the ever-evolving understanding of its migration through the environment, the site investigation (SI) for PFAS is not a typical “step out” like it is for other contaminants. Therefore, this means that additional evaluation/sampling rounds and/or additional investigation sampling could be needed even if the results from the site investigation work plan don’t have PFAS detects.
[City reply: Does the WDNR have examples of the types of situations where PFAS migration through the environment would require additional investigation activities after a “step out” style of site investigation is completed?](#)

Potable Well Sampling:

- As part of the May 2020 sampling event, add a set number of potable wells for sampling on the north end of CTH CR and a set number of potable wells for sampling on the south end of CTH CR and/or along Thunder Ridge Rd. DNR will allow VOC sampling to be completed along with the PFAS sampling in May 2020 for these selected wells, so you won’t have to schedule and mobilize twice to these properties to sample PFAS and VOCs in separate sampling events. The remaining potable wells along CTH CR would then be sampled during October 2020.

City reply: A total of eight additional potable wells have been added to the sampling schedule. Four on the northern end of CTH CR and four on the southern end of CTH CR/Thunder Ridge Road. These locations will be sampled for VOCs and PFAS (i.e. WI 36 list).

The City will assess the necessity for PFAS sampling of the remaining potable wells along CTH CR after receiving the results of this second round of potable well sampling.

- The replacement private wells should be sampled for PFAS to determine they have not been impacted by PFAS. It is DNR's preference that these be sampled now, but it could be delayed to a future sampling event.

City reply: The currently reviewed Work Plan, for which this response is being offered, includes sampling of replacement wells along Hecker Road.

Response Actions (Alternative Water Management Plan)

- For potable well locations with reported PFOA and/or PFOS concentrations below the proposed ES standard (combined PFOA & PFOS: 20 ppt), the DNR highly recommends confirmation sampling to be completed.

City reply: The City will review the need to conduct confirmation sampling on an individual result basis.

Monitoring Well Sampling:

- The DNR has no changes to this section of the workplan.

Surface Water Sampling:

- Add location SG-2 for surface water sampling.
- City reply: Agreed.
- Fish tissue sampling may need to be completed in a future sampling event based on the evaluation of the sample results from this proposed work.

City reply: No comment at this time.

If you have any questions, please let me know.

Regards,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Tauren R. Beggs

Phone: (920) 662-5178

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From: Henderson, Dave <Dave.Henderson@aecom.com>

Sent: Wednesday, March 18, 2020 3:43 PM

To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; GravelPit (<GravelPit@manitowoc.org> <GravelPit@manitowoc.org>)

Subject: Newton Pit - Revised Emerging Contaminant Work Plan Update #1

Tauren,

Attached is the Revised Emerging Contaminant Work Plan Update #1, Former Town of Newton Gravel Pit, BRRTS No. 02-3-000268.

I am also submitting a copy through the WDNR's R&R Submittal Portal.

Thanks
dsh

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