

Willkom, Mae - DNR

From: Willkom, Mae - DNR
Sent: Tuesday, April 24, 2018 10:51 AM
To: 'Miller, Anthony W.'
Subject: RE: BRRTS#02-18-000274_WRR Environmental Services_Well Abandonment Request (55929.005)

As we discussed by telephone yesterday, DNR concurs with WRR's plans to abandon the wells listed in your email below. During our conversation, you stated that WRR does not plan to attempt rehabilitation of long-screened wells W-20 and/or W-22. In addition, these wells were previously approved for abandonment in a WPDES permit.

It should be noted that the wells listed in your second bulleted item were identified in a 1987 addendum (to a Corrective Action work plan) as having been installed by Eau Claire County, rather than WRR, and appeared on a 1987 map prepared in conjunction with plans for a clay borrow pit south of WRR, from which the county later hauled material in 1990. DNR is also aware of negotiations between WRR and Eau Claire County in late 2014 for a Groundwater Monitoring Well Access Agreement.

Thank you for your continued efforts to restore the environment at this site.

We are committed to service excellence.

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

Mae E. Willkom

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From: Miller, Anthony W. [mailto:awmiller@GFNET.com]
Sent: Friday, January 19, 2018 1:29 PM
To: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>; DNR RR WCR <DNRRRWCR@wisconsin.gov>
Cc: 'Bob Fuller' <bfuller@WRRES.com>; Hager, Jim <hagerjl@wrres.com>; Kugle, Dennis F. <dkugle@GFNET.com>
Subject: BRRTS#02-18-000274_WRR Environmental Services_Well Abandonment Request (55929.005)

Mae –

As you know, we are putting together estimated costs to closure for various remedial activities at the WRR site in Eau Claire. Toward that end, to save on project costs, we would like to abandon the following monitoring wells in 2018:

- W-20 and W-22, which have long screened intervals of 30 ft and 40 ft, respectively. These wells, along with another long-screened well W-21, were approved for abandonment in the WPDES permit reissued on November 22, 2012, and effective January 2013. W-21 was abandoned in September 2013. As discussed in Gannett Fleming's April 2013 *Corrective Action Plan*, W-20 and W-22 were not abandoned then to allow them to be used to monitor VOC concentrations in the mid-depth aquifer after RW-6 and RW-7 were redeveloped and RW-6 restarted in 2013. Since then, W-20 and W-22 have been sampled on an annual and semi-annual basis, respectively. With minor exceptions, VOC concentrations in W-20 and W-22 have decreased since on- and off-site remedial activities were restarted in 2012-13. See attached table that includes the groundwater samples results from May 2009 through the most recent round of samples collected in October 2017. Because these wells have long screened intervals, we would like to abandon these wells and eliminate any possibility that they are contributing to the downward migration of VOCs.
- MW-101A, MW-102, MW-102A, MW-103, MW-103A, MW-108, MW-108A, W-10 and W-10A. These wells are located side-gradient of the VOC plumes emanating from WRR and have not been sampled in over 10 years.

The wells that we are requesting approval to abandon in 2018 are highlighted in yellow on the attached figure. Because the WDNR is requiring WRR to provide financial assurance through closure, including a 3 percent annual increase for inflation and a 10 percent contingency, we would like to abandon these non-essential wells in 2018 rather than carrying those costs forward to the end of the project.

Please let me know if you have any questions or need additional information to approve our request.

Thanks,

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