

From: Sager, John E - DNR
Sent: Tuesday, November 16, 2021 10:30 AM
To: Bessingpas, David; Klinkhamer, Christopher; cieniewski.scott; Klatt, David/CHC; Jane Patarcity (Jane.Patarcity@TRMI.biz)
Cc: Saari, Christopher A - DNR; Fassbender, Judy L - DNR (Judy.Fassbender@wisconsin.gov); Endsley, Erin A - DNR (erin.endsley@wisconsin.gov); Graham, Joseph R - DNR (Joseph.Graham@wisconsin.gov); Kilburg-Basnyat, Brita J - DHS; Koch, Amanda A - DHS
Subject: Follow-up to November 10th Conference Call

Hello All,

Thank you for sharing the additional information you presented during the November 10th conference call. DNR requested information as a follow-up to that meeting, including the presentation materials and spreadsheet. We have not yet received that information. DNR and DHS had a chance to discuss the information presented at the November 10th meeting and are providing the following feedback in the interest of keeping the FS process moving forward:

- DNR agrees that the project team should evaluate the data on a point-by-point basis to determine if an area is within the remedial footprint and remedial action is warranted.
- Conduct the point-by-point evaluation using the site-specific cleanup levels DNR proposed on July 30, 2020 and developed in consultation with DHS. This includes utilizing a 1×10^{-5} target risk for individual cPAHs and the exposure assumption modifications as described in the memo attached to the letter. DNR and DHS consider the site-specific cleanup levels presented in the July 30, 2020 letter to be protective for recreational use, and they offer the maximum flexibility possible for site-specific cleanup levels.
- Any point with results exceeding the cleanup levels on an individual basis, or exceeding the cumulative cancer risk of 1×10^{-5} or hazard index of 1.0 for noncancer compounds be considered within the remedial footprint.
- To be consistent with how DNR has applied direct contact RCLs at all other sites in Wisconsin, apply the DNR site-specific cleanup levels over the 0-4' depth interval to address potential risk from direct contact with contaminated soil.
- Although DNR recommends using individual exceedances and cumulative exceedances to define the remedial footprint, the proposal to use two or more compounds with risk $> 1 \times 10^{-6}$ or a single compound with risk $> 2 \times 10^{-6}$ could be useful criteria to apply during the development of remedial alternatives, in order to identify areas that may warrant a more or less aggressive remedial action.
- DNR and DHS do not support application of the project team's site-specific cleanup level assumptions for depths greater than 0.5' below the surface. Consistent with previous feedback on these proposed cleanup levels, DNR and DHS do not support the modified exposure assumptions or the use of fractional intake, and find that the site-specific cleanup levels derived with those inputs are not protective for site users.

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