

**From:** Feeney, John M - DNR  
**Sent:** Friday, July 10, 2020 11:29 AM  
**To:** 'Robert Cigale'  
**Cc:** Norman, Michele R - DNR  
**Subject:** PFAS Sampling Scope of Work, Cook Composite/Former Freeman Chem (Arkema, Inc), BRRTS #: 02-46-000767

Hi Bob:

The DNR has reviewed the documents *Site Investigation Work Plan – PFAS Contamination*, dated April 6, 2020, and *Clarifications to Site Investigation Work Plan – PFAS Contamination*, dated May 15, 2020. The proposed work includes taking groundwater samples from monitoring wells at various locations, and collecting shallow soil samples in the fire control nozzle test area. Samples will be analyzed using Environmental Protection Agency Method 537-Modified, which includes the State of Wisconsin 36-compound list. You may proceed with the investigation. The **original** scope of work included:

#### Soil

- Five soil samples at shallowest native soil.
- Single 5' Macrocores from ground surface to 5' below land surface at all locations. Lab sample taken from shallowest native soil.
- 36 compound PFAS list, EPA modified method 537

#### Groundwater

- Sample 4 wells near the nozzle test area to be sampled (SE of buildings 38 and 39)
  - Two water table wells: W-04A, W-49
  - Two shallow bedrock wells: W-23, W-50
- 36 compound PFAS list, EPA modified method 537

#### Sampling Procedures

- Michigan Department of Environmental Quality General PFAS Sampling Guidance
- Endpoint Solutions SOP 013 (Appendix B of the SIWP)

During a phone call on June 25, we discussed the following:

- Dropping W-23 and W-4A and adding W-44 and W-45. You indicated that W-45 may likely be too dry for a sample. If that is the case, then sample W-4A instead (as originally planned). Add sampling at W-08R.
- The expectation for the soil sampling activities is to get a shallow soil sample that is not base course or chunks of concrete etc. The term in your work plan of "first native soil" meant getting samples just below the pavement or gravel, unless there is fairly new fill, for example construction rubble etc., in which case you would need to go deeper.

In summary, the **revised** scope of work is:

#### Soil

- Five soil samples of the shallowest native soil.
- Single 5' Macrocores from ground surface to 5' below land surface at all locations. Lab sample taken from shallowest native soil.
- 36 compound PFAS list, EPA modified method 537

## Groundwater

- Sample **5** wells near or downgradient from the nozzle test and the product storage areas
  - 4 water table wells: W-44, W-45, W-49, W8R (if W-45 is dry, sample W-4A instead)
  - 1 shallow bedrock piezometer: W-50
- 36 compound PFAS list, EPA modified method 537

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Site investigation is an iterative process. The results of the proposed sampling may indicate that further assessment is needed to define the degree and extent of contamination in all affected media. Additionally, as knowledge surrounding PFAS continues to grow, further investigation may be necessary to define the degree and extent of different compounds. Please let me know if you have any questions. As a reminder, the DNR requires notification of the sampling results within 10 days.

Thank you,

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**John Feeney, Wisconsin PG #750**

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