

## Feeney, John M - DNR

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**From:** Feeney, John M - DNR  
**Sent:** Friday, January 07, 2022 2:20 PM  
**To:** Robert Cigale  
**Cc:** Keith LINTON  
**Subject:** RE: CCP/Arkema Saukville, BRRTS #: 02-46-000767

Thanks for getting back to me Bob. I will find out who I need to work with here and contact you soon regarding the PFAS sampling methods review.

I looked at your December 21, 2021 request to change the reporting frequency defined in the long term monitoring plan for the Cook Composite, Former Freeman Chem site. It is my understanding from your letter that the only change will involve no longer submitting the quarterly reports, and that all other activities will remain the same including the submittal of an annual groundwater monitoring report. This request is approved. Please advise us when we can anticipate the next report.

We received your site investigation workplan addendum for the investigation related to the DNR's RCRA 2020 review on December 3, 2021. It is currently under review. The DNR looks forward to getting your confirmation PFAS sampling results and working with you and Retia USA LLC/Total Energies to develop a well-defined conceptual site model and overall strategy to move this case forward.

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**John Feeney**

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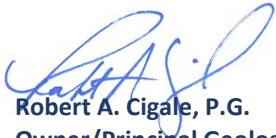
**From:** Robert Cigale <bob@endpointcorporation.com>  
**Sent:** Friday, January 07, 2022 1:18 PM  
**To:** Feeney, John M - DNR <JohnM.Feeney@wisconsin.gov>  
**Subject:** CCP/Arkema Saukville

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I'm sorry I missed your call yesterday. I understand you were calling in regards to our recently submitted request to modify the groundwater monitoring plan (GMP) for the site to eliminate the need for submitting quarterly reports, and were inquiring whether the GMP included any PFAS sampling. It is our opinion any future groundwater sampling for PFAS should be independent of the 1987 Corrective Action Order on Consent required sampling. In the July 13, 2021 *PFAS Contamination Site Investigation Report of Results*, we recommended collecting a second set of samples from glacial drift monitoring wells W-45 and W-49 using other sampling methods (e.g. low flow sampling) including collection of turbidity measurements and/or employing field filtering (using glass filters) as appropriate per the sampling method and/or laboratory methods (centrifugation) to reduce the sediments in the samples such that representative groundwater concentrations can be obtained from the analyses. We have not performed this additional sampling as we were waiting for concurrence from the Department regarding our proposed methods to ensure any additional sampling

data collected would be acceptable to the Department. Let me know if you concur with this plan and whether you prefer one method over another (low flow vs filtering, etc.) and we will schedule the resampling.

Thanks, Bob



**Robert A. Cigale, P.G.**  
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