



October 25, 2023

Mr. Keith Linton
Retia USA, Legacy Site Services LLC
Total Energies Petrochemicals & Refining USA, Inc.
1201 Louisiana St.
Houston, TX 77002

Subject: Review of *Groundwater Monitoring Plan Modification Request*
Cook Composite/Former Freeman Chemical (Arkema)
340 Railroad Street, Saukville, WI
BRRTS #: 02-46-000767, FID #: 246004330

Dear Mr. Linton:

The Department of Natural Resources (DNR) received the document, *Groundwater Monitoring Plan Modification Request*, dated July 10, 2023, for the site identified above submitted by your environmental consultant, Endpoint Solutions Corp (Endpoint) with a fee for a written response from the DNR.

Recent Regulatory Background

The DNR recognizes that the site investigation at Cook Composite/Former Freeman Chemical (Arkema) is on-going. Retia USA Legacy Site Services LLC (Retia) and your consultant Endpoint have recently conducted a soil investigation subsequent to the facility buildings being razed in 2021.

Similarly, there is continuing investigation on the neighboring Northern Signal site, BRRTS #: 02-46-535604, with recent piezometer installation and the conversion of well PW-08 into a multi-port piezometer. Endpoint has proposed that the PW-08 piezometer and monitoring wells W-19A, and W-27, (both water table wells completed in the shallow glacial drift) be dropped from the Endpoint's current groundwater monitoring program. These are all upgradient wells on the Northern Signal site, in proximity to former chlorinated organic compound (CVOC) source areas located on the Northern Signal site.

Review

The DNR has reviewed the document and concurs with Endpoint's plan to drop the three upgradient wells from your groundwater monitoring program: wells PW-08, W-19A, and W-27.

It is the DNR's understanding that the PW-08 piezometer nest and the other two wells will be incorporated into the Northern Signal site's groundwater monitoring program. The responsible party at the Northern Signal Site is Woodstream Corporation (Woodstream). Woodstream's consultant is TRC Companies, Inc (TRC). The DNR requests that you facilitate the transfer of responsibility for wells PW-08, W-27 and W-19A to Woodstream and TRC for further monitoring.

Other DNR Comments

The following wells were previously installed by Cook Composite/Former Freeman Chemical (Arkema) on the Northern Signal property and are currently the responsibility of Arkema/CCP: PW-08, W-27 and W-19A. When these wells 1) are no longer sampled regularly or 2) are not planned to be sampled in the future by either Arkema/CCP or Northern Signal, you will be responsible for well abandonment in the future unless Woodstream, at this time, agrees to abandon them when it is needed in the future.

On future maps, color-code existing monitoring wells Retia/Endpoint is managing for but are not in the current groundwater monitoring program.

The DNR understands that your investigation of PFAS compounds in the groundwater is ongoing and that this may necessitate additional changes to the monitoring program.

The site investigation can be an iterative process, and additional information provided may indicate that further assessment is needed to define the degree and extent of contamination. Once this additional information is provided to the DNR, your consultant should re-evaluate remedial actions and the appropriate pathway for case closure. The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at 262-416-8643 or johnm.feeney@wisconsin.gov.

Sincerely,



John Feeney, PG
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

cc: Mr. Bob Cigale, Endpoint Environmental Solutions, Corp.
Mr. Ted O'Connell, TRC
Woodstream Corporation