

## Edelstein, Gary A - DNR

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**From:** Edelstein, Gary A - DNR  
**Sent:** Wednesday, March 29, 2017 10:57 AM  
**To:** 'Sullivan, Sheila'  
**Subject:** Hagen Farm 2016 Annual O&M Report

Sheila,

I've read the above-referenced report we received on March 27, 2017 and have the following comments.

### Section 2.8 Recommendations:

I'm willing to consider a temporary shutdown of the ISVE system provided that some sort of passive venting of the area under the cover continues to ensure there is no gas buildup under the cover. Clearly, gas probe and groundwater monitoring would need to continue to evaluate this and WM should commit to monitoring criteria that would automatically trigger starting the system up again.

### Section 4.9 Recommendations:

As I've stated before, I'm still not entirely sure if the time is right to allow a temporary LFAS shutdown. I still believe more time is needed to see what the impact of the LFAS expansion is. An example of monitoring results we should watch for a greater time is VC in P17C and P26B shown on Figure 11. It appears that P17C is beginning to show downward VC trends. However, P26B is showing variable VC trends lately – not decreasing trends. It's unclear to me if the LFAS has much of an impact on P26B because it may be side gradient relative to the flow through the LFAS. However, P26B DO results indicate aerobic degradation should occur, but apparently isn't that effective yet.

I note that far downgradient well OB8M continues to show more stable VC trends despite the DO results for that well, which indicate again that aerobic degradation should occur there as well. That well is a considerable distance from the source and the LFAS, so I wonder if the LFAS will have much of an impact at that distance whether it continues to operate or not. In any case, that well, as will all wells in the plume, will have to show stable or receding trends in the long run, after all active remediation that is being used to restore the groundwater discontinued, to consider state flexible closure criteria in any future decision document.

As for the recommendation for monitoring frequency changes for P26B and MW7, it appears P26B is showing variable VC trends lately – not decreasing trends. However, I'll leave it to you and your contractor to evaluate the groundwater issues in detail and decide on this recommendation.

Thanks, Gary E

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