



April 17, 2020

Mr. Maxwell Geyer
EH&S Specialist
Pentair Flow Technologies, LLC
293 Wright Street
Delavan, WI 53115

Subject: PFAS Sampling Requirements
Delavan Municipal Well No. 4 Superfund Site
293 Wright Street, Delavan, WI 53115
BRRTS # 02-65-529579, FID # 265091640

Dear Mr. Geyer:

The Wisconsin Department of Natural Resources (DNR) identified the Delavan Municipal Well No. 4 Superfund Site as a potential source for per- and polyfluoroalkyl substances (PFAS). The DNR believes these emerging contaminants may be present in soil and groundwater on your property identified above. The DNR has regulatory authority to ask responsible parties to evaluate hazardous substance discharges and environmental pollution including emerging contaminants:

- Wis. Stat. § 292.01(3) "Discharge" means, but is not limited to, spilling, leaking, pumping, pouring, emitting, emptying or dumping.
- Wis. Stat. § 292.01 (4) "Environmental pollution" means contaminating ... air, land, or waters of the state or making the same injurious to public health ...
- Wis. Stat. § 292.01(5) "Hazardous substance" means any substance ... which may pose a substantial present or potential hazard to human health or the environment because of its quantity, concentration or physical, chemical or infectious characteristics ...

Background

A series of floor drains and sumps in Plant #1 of the Pentair Flow Technologies facility were used from 1958 to 1976 to collect spills and other discharges and to separate sludge and solids from the spills prior to their discharge to the storm sewer system. Because the sumps were constructed of concrete block, leakage to the surrounding soils was possible. Also, spent solvents were reportedly released onto cast iron chips in the area southeast of Plant #1, however the exact release locations were uncertain. An open contamination case with the DNR's Remediation and Redevelopment Program titled Delavan Municipal Well No. 4 Superfund Site is tracked as BRRTS # 02-65-529579.

Site Investigation

Site investigation scoping (Wis. Admin. Code § NR 716.07) and a site investigation work plan (Wis. Admin. Code § NR 716.09) require an evaluation of the history of the facility, previous discharges, and uses on the site that may be associated with discharges of hazardous substances. According to Wis. Admin. Code § NR 716.09,

the DNR requires that you submit a site investigation work plan that includes an assessment of PFAS, and per Wis. Admin. Code § NR 716.07 (4), all environmental media affected or potentially affected by the contamination must be evaluated.

As stipulated in Wis. Admin. Code § NR 716.07 and Wis. Admin. Code § NR 716.09, the work plan should include a written evaluation of potential PFAS compounds that were historically or are presently produced, used, handled, or stored at the site. The evaluation should include any available information on whether any products containing PFAS were used in any process services, the duration of PFAS use, the type of PFAS used, and any areas of the site where PFAS may have been used, stored, or discarded. The site investigation work plan shall follow Wis. Admin. Code § NR 716.09 and shall include a sampling and analysis strategy to be used during field investigation that considers all information in the evaluation conducted under Wis. Admin. Code § NR 716.07.

Schedule

The DNR is requesting that you submit a site investigation work plan for PFAS by May 22, 2020.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding anything outlined in this letter, or would like to arrange a meeting, please contact me, the DNR Project Manager, at 920-893-8528, or at Thomas.Wentland@wisconsin.gov.

Sincerely,



Thomas A. Wentland
Waste Management Engineer
Remediation and Redevelopment Program
Southeast Region

cc: Michele Norman, DNR
Jenna Soyer, DNR
Angie Carry, DNR