



May 2, 2024

David Flynn
Environmental Health & Safety Manager
Pentair Flow Technologies
293 S. Wright St.
Delavan WI 53115
Sent by email to david.flynn@pentair.com

SUBJECT: Additional work required under Contract #SF-90-02
Delavan Municipal Well #4 Superfund project
BRRTS #02-65-529579
EPA ID: WID980820062

Dear Mr. Flynn:

The Wisconsin Department of Natural Resources (DNR) has determined that additional work is needed to accomplish the goals of the remedial action at Pentair, formerly Sta-Rite Industries, for the above-referenced project. The continued operation and maintenance of the groundwater extraction system and groundwater monitoring are required under the September 28, 2000 Record of Decision (ROD), as amended by the June 5, 2018 Explanation of Significant Differences (ESD). DNR is notifying you per Section VII of Contract #SF-90-02 and requiring the following additional work:

1. Within 60 days of the date of this letter, prepare and submit a letter report providing a:
 - a. current map of the groundwater plume, showing the original contaminant source areas, monitoring well and extraction well locations, current concentrations of trichloroethene (TCE), tetrachloroethene (PCE), and 1,1,1-trichloroethane (1,1,1-TCA), and isoconcentration lines;
 - b. cross-section drawn through the plume centerline showing geologic and soil units, a groundwater flow net, monitoring wells and extraction wells used to construct the cross-section, and current TCE, PCE, and 1,1,1-TCA concentrations and isoconcentration lines;
 - c. groundwater flow maps from before and after Municipal Well #4 was returned to service;
 - d. discussion of extraction system effectiveness while Municipal Well #4 was not pumping and at the present time, focusing on the capture zone of the extraction system laterally and vertically and the changes observed after Municipal Well #4 was returned to service.
2. Within 90 days of the date of this letter, submit an updated groundwater monitoring plan that follows Wis. Adm. Code section NR 724.17.
3. Within 90 days of the date of this letter, submit an updated operation and maintenance plan following NR 724.13(2) for the groundwater extraction system.

4. Within 120 days of the date of this letter, submit a plan for sampling 1,4-dioxane at select monitoring wells. Provide an explanation of how the selected wells were chosen. Specify sampling procedures, analytical methods, limits of detection and quantitation, a list of proposed wells, and a sampling schedule. DNR requests use of EPA method 8270 with isotope dilution in order to achieve limits of detection and quantitation at or below the Wis. Admin. Code ch. NR 140 enforcement standard for 1,4-dioxane.

If you wish to discontinue pumping at EX-1, you may submit a proposal for agency review; changes to extraction system operation need to be reviewed and approved in advance by DNR in consultation with EPA. In addition to discussing the sampling results provided in the annual reports, your proposal will need to demonstrate that the extraction system will still provide adequate hydraulic control, both laterally and vertically, of the groundwater contamination plume without using EX-1. Note that significant changes to the remedy may require updates to the existing decision documents.

The plans and reports will be reviewed by DNR in consultation with EPA. The requirement to submit paper copies is waived. Submit your documents to DNR through the Remediation & Redevelopment online submittal portal at [RR Program Submittal Portal | Wisconsin DNR](#).

If you have any questions or wish to discuss the project, contact Cindy Koepke, the DNR project manager, at cynthia.koepke@wisconsin.gov or 608-219-2181.

Sincerely,



Issac A. Ross
South Central Region Team Supervisor
Remediation & Redevelopment Program
Fitchburg DNR Service Center – Fitchburg, WI

Copies by email to:
Michael Holt – EPA, Region V
Dennis Schwind - Pentair
Mark Manthey – Tetra Tech
Erin Endsley – DNR Remediation & Redevelopment
Christopher Durgin – DNR Drinking & Groundwater
Nathan Kloczko – Wisconsin Dept. of Health Services