



April 28, 2020

BRYANT ESCH  
WAUPACA FOUNDRY, INC.  
1955 BRUNNER DRIVE  
WAUPACA WI 54981

Subject: Review of Site Investigation Work Plan  
Waupaca Foundry, Inc. – Plant No. 4  
805 Ogden Street, Marinette, Wisconsin  
BRRTS #: 02-38-584102

Dear Mr. Esch:

On February 5, 2020, the Wisconsin Department of Natural Resources (DNR) received the *Workplan for the Site Investigation for Per- and Polyfluoroalkyl Substances (PFAS) at Waupaca Foundry, Inc. – Plant No. 4, Marinette, Wisconsin* (Report) prepared for Waupaca Foundry, Inc. (Waupaca Foundry) by AECOM. The Report was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. DNR reviewed the Report for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

#### Background

The property currently serves as the location of Waupaca Foundry, Inc., a ductile iron metal casting facility for manufacturing various types of parts for the light vehicle, material handling, power transmission, agriculture, hydraulics, and commercial vehicle market sectors. Historically, the property served as a dumping site for local sawmill waste and as a temporary coal storage yard. In addition, a City of Marinette municipal landfill was present in the northwest portion of the property until before 1970.

As part of the construction of new transmission lines across the Waupaca Foundry property, American Transmission Company (ATC) conducted soil and groundwater in the areas of proposed construction of transmission line footings. At the request of the DNR, soil and groundwater samples were submitted for laboratory analysis for PFAS compounds. Laboratory analysis indicated perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) were present in groundwater at concentrations greater than the DNR's proposed NR 140 enforcement standard (ES) of 20 nanograms per liter (ng/L) combined PFOA and PFOS. PFOA and PFOS were also detected in soil samples, albeit below the NR 720 Industrial Direct Contact (DC) Residual Contaminant Level (RCL) of 16.4 milligrams per kilogram (mg/kg).

### SIWP Summary

The Report recommends site investigation activities with the goal of determining if the impacts are the result of the presence of the historical landfill, or due to area-wide PFAS concerns in the Marinette area. The Report recommends completion of the following activities:

- Installation of six soil borings to be converted into 2-inch monitoring wells. One soil sample from just above the observed groundwater level will be submitted for laboratory analysis for PFAS compounds;
- Two staff gauges in along the river channels on the north and south sides of the island to collect river elevation readings and surface water samples;
- One surface water sample to be collected around the southwest short of the island;
- Soil, groundwater, and surface water samples will be submitted to certified laboratory for analysis of 36 PFAS compounds accredited by the State of Wisconsin. In addition, Level IV quality control reports will be provided by the laboratory.

### DNR Review of the SIWP

Following DNR review of the Report, DNR requests that you proceed with the proposed scope of work while incorporating the following comments:

#### A. Evaluation of Environmental Media

All environmental media affected or potentially affected by the contamination must be evaluated (Wis. Admin. Code § NR 716.07(4)).

- Based on the potential for near-surface soil impacts resulting from the industrial use of the property and the historic spills recorded on the property, the DNR recommends one additional soil sample be collected from the 0 to 1 foot below ground surface (bgs) interval from each of the proposed soil borings.

#### B. Other DNR Comments

##### 1. Sampling Results

Sampling results must be sent to the DNR, property owner(s) and occupant(s) as applicable, including owners and occupants of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).

##### 2. Electronic Submittal

Given the Safer at Home emergency order, please submit all NR 700 submittals in an electronic version through the submittal portal.

### Schedule

The submitted Report does include a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). DNR is requesting implementation of the following schedule:

- Per Wis. Admin. Code § NR 716.11(1)(2g), field investigation activities shall be initiated within 90 days of submittal of the work plan, by July 27, 2020.
- Results of the site investigation activities must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR shall be submitted to DNR within 60 days after completion of the field investigation and receipt of laboratory data. DNR suggests that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports will be required until the case is closed.

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 (920) 424-0399 or [david.neste@wisconsin.gov](mailto:david.neste@wisconsin.gov).

Sincerely,



David Neste  
Project Manager – Hydrogeologist  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Andrew Mott, AECOM (via email: [Andrew.Mott@aecom.com](mailto:Andrew.Mott@aecom.com))