



March 12, 2021

Waupaca Foundry, Inc.
ATTN: Bryant Esch
1955 Brunner Drive
Waupaca, WI 54981

SUBJECT: Response to Site Investigation Report – Additional Investigation Needed
Waupaca Foundry Inc. – Plant #4 PFAS, 806 Ogden Street, Marinette, Wisconsin
WDNR BRRTS #: 02-38-584102

Dear Mr. Esch:

On December 29, 2020, the Wisconsin Department of Natural Resources (DNR) received a *Subsurface Investigation for Per- and Polyfluoroalkyl Substances (PFAS)* (“Report”) for the above-referenced site, dated September 25, 2020, and submitted by your consultant, Andrew Mott, AECOM Technical Services, on your behalf. The report was accompanied by the appropriate fee of \$1050, required under Wisconsin Administrative Code § NR 749.04(1), for formal DNR review and response. Based on review of your submittal, DNR has determined that additional investigation is needed.

Wis. Admin. Code § NR 716.11(3)(a) states: “The purpose of a field investigation shall be to: Determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.” Additional investigation is needed to fully define the degree and extent of PFAS contamination at your site. Specifically, the following deficiencies were noted during review of your submittal:

- The Report recommends additional site investigation activities including:
 - Installation of three (3) monitoring wells west, east, and southeast of the presumed source area near monitoring well MW-3, including collection of soil samples;
 - Future considerations included:
 - Installation of piezometers nested with monitoring wells MW-3, MW-4, and the proposed monitoring well southeast of MW-3 to define potential vertical impacts within the groundwater aquifer;
 - Additional soil borings and temporary monitoring wells around MW-3 with the goal of characterizing the source area for future remediation efforts;
 - Geophysical review of the general area around MW-3 to determine if historic activities (i.e. burial of waste and/or waste drums) resulted in PFAS impacts to the environment.

At this time, the DNR does not concur with the installation of additional monitoring wells and/or nested piezometers. The DNR recommends the following:

- Conduct measures to define the source of the contamination (Wis. Admin. Code § NR 716.01). Placement of future monitoring wells would be better informed once the source area is defined. These measures should include:
 - Evaluation of historic disposal practices at the onsite landfill, if possible;
 - Source-area evaluation in the area of MW-3, as discussed in the Report;
 - Geophysical review of the general area of MW-3, and other site areas as warranted, as discussed in the Report.
 - Other areas may need to be evaluated for a source area based on ongoing evaluations and the upcoming geophysical review.

In addition to the activities outlined above, the DNR recommends the following:

- On November 6, 2020, the Wisconsin Department of Health Services (DHS) provided the DNR with recommended groundwater standards for 22 substances (“Cycle 11”). These recommendations include individual standards for 12 per- and polyfluoroalkyl substances (PFAS), and combined standards for six PFAS. Information regarding the DHS’s Cycle 11 proposed groundwater standards can be found here: <https://www.dhs.wisconsin.gov/water/gws-cycle11.htm>. In future submittals, please use these proposed standards as a reference in evaluating PFAS laboratory analytical data.
- Based on the property’s location on the island in the Menominee River, the DNR recommends evaluation for potential impacts to wetlands and outstanding water resources (Wis. Admin. Code § NR 716.08 (b), (c)).
- An evaluation of potential impacts to receptors, including public and private water supplies (Wis. Admin. Code § NR 716.07 (7)).
- Continue groundwater monitoring activities with existing site wells. Based on the constituents reported in the July 26, 2019, Notification of Hazardous Substance Discharge, include metals, polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) in the laboratory analysis (Wis. Admin. Code NR § 716.11(3)(a)).

Be aware that during your investigation, you are required to comply with Wis. Admin. Code chs. NR 700-754 and all other applicable statutes and administrative rules, including those pertaining to solid and hazardous waste management and/or wastewater discharges. Wis. Admin. Code ch. NR 716 details specific requirements for site investigations and for interpretation and presentation of your findings.

In addition, please keep in mind that depending upon the results of your additional investigation, it may be necessary for sampling to extend beyond your property boundaries if there is potential that contamination has affected neighboring parcels.

The DNR appreciates your efforts to investigate and remediate this property. If you have any questions or concerns, please feel free to contact me at (920) 362-2072 or via email at david.neste@wisconsin.gov.

Sincerely,



David Neste
Hydrogeologist Project Manager
Remediation and Redevelopment

cc Andrew Mott, AECOM (via email: Andrew.mott@aecom.com)