



April 11, 2022

Waupaca Foundry, Inc.
ATTN: Bryant Esch – Director of Environmental Engineering
1955 Brunner Drive
Waupaca, WI 54981
Via electronic mail only to: Bryant.Esch@waupacafoundry.com

SUBJECT: Review of Site Investigation Work Plan – Revised April 18, 2022
Waupaca Foundry Inc. – Plant #4 PFAS, 806 Ogden Street, Marinette, Wisconsin
DNR BRRTS #: 02-38-584102

Dr. Mr. Esch:

On February 22, 2022 the Wisconsin Department of Natural Resources (DNR) received the report titled *2021 Continued Site Investigation and Conceptual Site Model v1.0 for Per- and Polyfluoroalkyl Substances (PFAS)* (Report) published January 28, 2022 by AECOM Technical Services (AECOM) on your behalf. The Report was submitted with the \$700 review fee in accordance with Wis. Admin. Code ch. NR 749. Waupaca Foundry Inc. (WFI) requested DNR concurrence and comment on the Report's conclusions and proposed next investigative steps. DNR reviewed the proposed next steps outlined in the Report as a site investigation workplan (SIWP).

SIWP Summary

Site investigation data collected to date indicates PFAS compounds are present in shallow groundwater across the site. The purpose of the proposed additional site investigation work is to determine horizontal and vertical extents of contamination, hydraulic gradient across the site, and further delineate potential sources at the site. The Report proposed the following scope of work:

- Installation of three (3) piezometers (PZs) nested with existing monitoring wells MW-3, MW-4, and MW-5 to establish vertical groundwater gradient. PZs will be screened from 25 to 30 feet below ground surface (bgs) with the top of screen located approximately 10 feet below the existing monitoring wells. This is to eliminate concerns the vertical groundwater gradient is bringing in PFAS contaminants from the deep aquifer derived from other regional PFAS issues.
- Conduct slug test analysis at multiple monitoring well locations to obtain field data for hydraulic conductivity calculations.
- Install two (2) additional monitoring wells east of Ogden Street for the purpose of horizontal delineation.
- Conduct one (1) round of PFAS groundwater and surface water monitoring to include: existing MWs, new PZs, new off-site MWs, and existing surface water monitoring locations.

DNR Review of the Conclusions of the Report

Following review of the Report's conclusions and proposed additional investigative steps, the DNR generally concurs with the outlined scope of work, with the following comments:

- Information presented in the Report indicates that subsurface materials consist of historical waste fill material. As such, the property owner must comply with solid waste rules in Wis. Admin. Code ch. NR

500 to 599 while any waste materials remain in place. Any future redevelopment of the property must account for the presence of waste materials and will require the issuance of an approval from the DNR to build on waste materials prior to the start of any construction (Wis. Admin. Code § NR 506.085).

- 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 716.07(8) (b), (c)).
- Potential impacts to sediment in the Menominee River will need to be evaluated as part of future site investigation activities (Wis. Admin. Code § NR 716.05(1)).

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 the date of this letter, by July 10, 2022.
- 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.

Sincerely,



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

Cc: Andrew Mott, AECOM Technical Services (Andrew.Mott@aecom.com)