

Neste, David E - DNR

From: Neste, David E - DNR
Sent: Monday, July 18, 2022 7:11 AM
To: Esch, Bryant K.
Cc: Henderson, David; Dean, Janel; Bogdan, Dorin; 'Mott, Andrew'; Hass, Brian A.
Subject: RE: PROJECT UPDATE: Waupaca Foundry Plant 4 PFAS (BRRTS #02-38-584102)

Bryant,

Thank you for the update. I concur with you plan to conduct the on-site sampling as detailed in the site investigation workplan. As we discussed on the phone, please document your attempts to gain access to off-site areas and include that documentation in the site investigation report. At that time, the DNR will determine if additional steps need to be taken to collect the off-site samples.

Thanks,
Dave

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Dave Neste

Cell Phone: (920) 362-2072
david.neste@wisconsin.gov

From: Esch, Bryant K. <Bryant.Esch@waupacafoundry.com>
Sent: Thursday, July 14, 2022 10:26 AM
To: Neste, David E - DNR <David.Neste@wisconsin.gov>
Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>; Bogdan, Dorin <Dorin.Bogdan@aecom.com>; 'Mott, Andrew' <Andrew.Mott@aecom.com>; Hass, Brian A. <Brian.Hass@waupacafoundry.com>
Subject: RE: PROJECT UPDATE: Waupaca Foundry Plant 4 PFAS (BRRTS #02-38-584102)

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Dave, as a follow-up to our phone conversation of today, Waupaca Foundry has been denied access for any project sampling on adjacent properties. As a result Waupaca is planning to proceed with all onsite work as summarized within the Department's Review of Site Investigation Work Plan, dated April 11, 2022. Waupaca will work to get the onsite work completed and a results report submitted to WDNR as soon as practicable.

Bryant

From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Tuesday, July 05, 2022 7:18 AM
To: Esch, Bryant K. <Bryant.Esch@waupacafoundry.com>

Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>; Bogdan, Dorin <Dorin.Bogdan@aecom.com>; 'Mott, Andrew' <Andrew.Mott@aecom.com>; Hass, Brian A. <Brian.Hass@waupacafoundry.com>

Subject: RE: PROJECT UPDATE: Waupaca Foundry Plant 4 PFAS (BRRTS #02-38-584102)

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Bryant,

Thank for the status update. The modified schedule as proposed is acceptable. If anything else comes up or you require additional assistance in getting access to the off-site property, please let me know.

Thanks,
Dave

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Dave Neste

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From: Esch, Bryant K. <Bryant.Esch@waupacafoundry.com>

Sent: Wednesday, June 29, 2022 3:09 PM

To: Neste, David E - DNR <David.Neste@wisconsin.gov>

Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>; Bogdan, Dorin <Dorin.Bogdan@aecom.com>; 'Mott, Andrew' <Andrew.Mott@aecom.com>; Hass, Brian A. <Brian.Hass@waupacafoundry.com>

Subject: PROJECT UPDATE: Waupaca Foundry Plant 4 PFAS (BRRTS #02-38-584102)

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Dave,

Waupaca Foundry Inc (WFI) provides the following updates on the implementation schedule of the Site Investigations (SI) Work Plan (WP) recommendations outlined in the AECOM report, *2021 Continued Site Investigation and Conceptual Site Model v1.0 for PFAS*, dated January 28, 2022. Per the Wisconsin Department of Natural Resources (WDNR) Letter, Review of Site Investigation Work Plan, dated April 11, 2022, the WDNR requested Implementation of the following schedule:

- Field Investigation activities shall be initiated within 90 days of the date of the letter, by July 10, 2022.
- Results of the site investigation activities must be submitted to the WDNR in a comprehensive Site Investigation Report (SIR) within 60 days after the completion so the field investigation and receipt of the laboratory data.

Per the February 2022 SI WP recommendations, two monitoring wells were to be installed east of Ogden Street as depicted on Figure 10. Monitoring Wells MW-8 and MW-9 were both to be installed on adjacent properties to the east which are under separate ownership. WFI has contacted the adjacent property owners via telephone and an in-person

meeting with a request for access. Following a telephone conversation, the first property owner refused access on April 20, 2022. Due to the refusal it was decided to adjust the location of MW-8 into the City of Marinette's right-of-way adjacent to Ogden Street. WFI has conducted a telephone call (May 10, 2022), an in-person meeting (June 1, 2022) and telephone follow-up (June 17, 2022) with City officials to facilitate the required access. City of Marinette staff continue to review the request and have not yet granted access for the project. WFI will continue its efforts to secure permission for access from the City for the adjacent property.

Because WFI has not received permission for the off-site monitoring wells, the onsite work has not been started and the proposed SI implementation date of July 10 will be exceeded. Currently, drilling contractors are reporting at least a one month waiting list. For efficiency and budgeting reasons it is preferred to complete all of the work at one time to avoid redundant contractor mobilization, consultant oversight fees, and WFI staff time.

WFI maintains the goal to complete the SI work this summer and it is requested that WDNR support the extension of the schedule to coincide with the approval of access for the offsite property.

WFI will continue updating the WDNR on the status of the SI schedule. Please let me know if you have any questions.

Bryant

From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Monday, April 18, 2022 3:40 PM
To: Mott, Andrew <Andrew.Mott@aecom.com>; Bryant Esch <bryant.esch@waupacafoundry.com>
Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>
Subject: [EXTERNAL] RE: Waupaca Foundry Plt #4 PFAS (BRRTS #02-38-584102) SIR response

Andrew,

Attached is the letter revised to correct the date for implementation of the workplan.

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Dave Neste
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From: Mott, Andrew <Andrew.Mott@aecom.com>
Sent: Monday, April 18, 2022 2:31 PM
To: Neste, David E - DNR <David.Neste@wisconsin.gov>; Bryant Esch <bryant.esch@waupacafoundry.com>
Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>
Subject: RE: Waupaca Foundry Plt #4 PFAS (BRRTS #02-38-584102) SIR response

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Understood and we will keep you updated. Thank you

Andrew Mott P.G.* CPG
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From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Monday, April 18, 2022 2:26 PM
To: Mott, Andrew <Andrew.Mott@aecom.com>; Bryant Esch <bryant.esch@waupacafoundry.com>
Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>
Subject: [EXTERNAL] RE: Waupaca Foundry Plt #4 PFAS (BRRTS #02-38-584102) SIR response

Andrew,

That date is a typo. It should read 90 days from the date of the letter, or July 10, 2022. I will send out a revised letter with the correct date this afternoon.

I realize access issues may cause a delay. Just keep me updated as to progress and there won't be an issues.

Thanks,
Dave

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Dave Neste
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From: Mott, Andrew <Andrew.Mott@aecom.com>
Sent: Monday, April 18, 2022 1:45 PM
To: Neste, David E - DNR <David.Neste@wisconsin.gov>; Bryant Esch <bryant.esch@waupacafoundry.com>
Cc: Henderson, David <Dave.Henderson@aecom.com>; Dean, Janel <janel.dean@aecom.com>
Subject: RE: Waupaca Foundry Plt #4 PFAS (BRRTS #02-38-584102) SIR response

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Dave,

Thank you for your comments on the Site investigation Work Plan (Work Plan). WFI will proceed with the scope outlined. The three additional items outlined in the DNR Review of the Conclusions of the Report section will be addressed if construction is to occur (as applicable and similar to existing practice for the site regarding the potential disturbance of historic fill) or included within next Site Investigation report (wetlands, outstanding resources, and sediment review).

WFI and AECOM is requesting a clarification on the Schedule outlined on Page 2. The first bullet for implementation of the schedule is to begin field investigation activities within 90 days of the work plan, by "July 27, 2020". Please confirm the Work Plan and submittal date and timeframe. In addition, it should be noted that WFI will need to negotiate an access agreement to install downgradient wells on the properties across Ogden Street. This may delay the start of the site investigation activities. WFI and AECOM will keep the WDNR updated on changes to the site investigation schedule.

Thank you
Andrew

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From: Neste, David E - DNR <David.Neste@wisconsin.gov>
Sent: Monday, April 11, 2022 12:01 PM
To: Bryant Esch <bryant.esch@waupacafoundry.com>
Cc: Mott, Andrew <Andrew.Mott@aecom.com>
Subject: [EXTERNAL] Waupaca Foundry Plt #4 PFAS (BRRTS #02-38-584102) SIR response

Bryant,

Attached to the email please find the review letter for the site investigation report submitted to the DNR on February 22, 2022. Since you were looking for specific comment on the proposed next steps, we decided to treat it as a response to a site investigation work plan.

If you have an questions or concerns, feel free to reach out.

Thanks,
Dave

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Dave Neste

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