



November 8, 2023

Waupaca Foundry, Inc.  
Bryant Esch, Director of Environmental Engineering  
1955 Brunner Drive  
Waupaca, WI 54981  
*Via electronic mail only to: [Bryant.Esch@waupacafoundry.com](mailto:Bryant.Esch@waupacafoundry.com)*

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

Dr. Mr. Esch:

On August 18, 2023 2022 the Wisconsin Department of Natural Resources (DNR) received the report titled *2022 Continued Site Investigation Per- and Polyfluoroalkyl Substances (PFAS)* (Report) published July 13, 2023 and revised August 10, 2023, submitted by AECOM Technical Services (AECOM) on your behalf. A work plan addendum was received October 30, 2023. 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 additional investigative scope of work proposed in the Report.

#### SIWP Summary

Site investigation data collected to data indicates PFAS compounds are present in groundwater across the property. 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 (PZ-3A, PZ-4A, and PZ-5A) adjacent to existing piezometer/monitoring well nests MW/PZ-3, MW/PZ-4, and MW/PZ-5. The piezometers will be advanced to top of bedrock. Top of screen elevation is planned to be approximately 30 feet below the existing piezometers. These additional piezometers will be used to determine vertical groundwater grade and further delineate the contaminant plume. The work plan addendum amended the work plan to include a double cased well installation for proposed piezometer PZ-3A.
- Install monitoring well nest south of Waupaca Foundry property, across the Menominee River slough, on property owned by the City of Marinette. This nest will be used in delineating the upgradient vertical and horizontal extent of groundwater contamination, and to confirm groundwater flow direction. Installation of this well nest is contingent on right-of-access being granted to WFI.
- Continued groundwater monitoring including new and existing wells.

#### DNR Review

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:

- DNR understands WFI has reached out to off-site property owners, including the City of Marinette, to inquire about installation of monitoring wells at off-site locations. DNR will reach out to the City of Marinette to discuss granting access to the city-owned property to the south. DNR recommends moving forward with the implementation of on-site portion of the SIWP while access arrangements are made.

#### 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 February 6, 2024.
- 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) 362-2072 or [david.neste@wisconsin.gov](mailto: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](mailto:Andrew.Mott@aecom.com))