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**Sent:** Friday, March 18, 2022 1:03 PM  
**To:** McKnight, Kevin - DNR  
**Cc:** Kevin Tubbs; Suzanne Murawski; Scott Obremski; John Osborne; Witte, Edward  
**Subject:** Follow-up to WDNR Comments- February 1, 2022

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Greetings Kevin McKnight –

We are following up on your February 14<sup>th</sup> email in which you summarized comments and discussion from the January 26, 2022 PFAS Review Committee meeting regarding the open Oshkosh Defense PFAS investigations referenced above. To ensure our appropriate response back to the Department, we are providing the following general and site-specific comments and proposed approach as a means to bring clarity to our path forward.

General Comments:

We do want the Department to understand that Oshkosh is committed to advancing Wis. Admin. Code Ch. NR 716 site investigations for the 500 W Waukau and 359 W Waukau Avenue sites to the extent of scientific reasonableness and to a degree that is consistent with the standards to which the Department typically holds RPs when conducting site investigations across the State of Wisconsin. In doing so Oshkosh is willing to include the collection and analysis of up to the 33 PFAS currently requested in evaluating groundwater conditions in order to improve the collective understanding of the PFAS profile present at each site, the related sources that may be involved and for gaining information that may support obtaining off-site exemptions for Oshkosh based on suitable evidence. However, when delineating soil impacts, we propose limiting the PFAS analytes to those compounds already detected in soil which in each case represent the source-area impacts we are seeking to define.

As we attempt to align with the Department's objectives, we offer the following responses for your consideration:

1. Site Investigation Completeness. The Department is requiring the completion of an NR 716 site investigation which requires delineation of degree and extent of impaired media including soil and groundwater. The Department indicates that "PFAS without proposed standards" are considered environmental pollution and require the delineation of the degree and extent, and that "site-specific soil and groundwater standards may be proposed for use". Oshkosh intends to continue to evaluate the extent of PFAS in affected media utilizing and calculating site-specific values for the PFAS detected using the DHS' Cycle 10 and Cycle 11 recommendations for groundwater NR 140 standards as a guide. Again, given the body of information already collected on our sites that have aided in narrowing the detectable PFAS analytes, we plan to focus

the analyte list for soil samples to those PFAS already detected but include the list of 33 PFAS in groundwater. However, PFAS detected but not having proposed standards in either Cycle 10 or Cycle 11, will not be the focus of our delineation of the extent of impact.

2. Off-Site Exemption. These sites are in an industrial area adjacent to an airport with low-levels of PFAs detected in soil and groundwater on-site. The Department indicates that additional data will be required for an off-site exemption. Our Work Plan development for these sites will begin with compiling regional groundwater flow information which will be used to select locations for on-site upgradient groundwater monitoring wells at each site. A minimum of 3 or 4 wells at each site will be installed to confirm the site-specific groundwater flow direction. The PFAS composition found in upgradient and source area wells combined with the physical flow conditions will be used to understand the likelihood of PFAS impacts originating upgradient of the sites from other sources, and based on weight of evidence, would be the basis for which Oshkosh propose an off-site exemption be granted.
3. Waukau Lot – Sediment Question. The samples collected by GZA in the drainage ditch for all intents and purposes can be considered soil samples. The labeling as sediment samples are making no distinction of their origin other than characterizing the soils in the base of the ditch. Limited delineation adjacent and beneath these samples will be used to understand the extent of soil impacts in this area. As previously stated, for delineation of PFAS in soils, we propose to limit the analytes to those being detected in shallow soils and are indicative of source-area impacts.
4. West Plant – Sediment. For the West Plant sample, the outfall where it was collected can periodically be influenced by Glatz Creek during high flow events. Therefore, off-site sources may impact this area and delineation from the storm sewer outfall may be limited. A phased step out investigation pattern will be used to focus on the immediate area of the outfall to delineate impacts apart from Glatz Creek sediment deposition or impacted surface water. We anticipate coupling soil and area groundwater data to aid in drawing conclusions regarding localized versus off-site sources.

We will follow up with a call to you early next week, 3/21 or 22/2022, to discuss the approaches described above. Once confirmed, GZA on behalf of Oshkosh will prepare and submit work plans that describe our next phase of investigation at these two sites.

We appreciate your cooperation and assistance.

**Kevin M. Hedinger**

**Senior Project Manager/ Hydrogeologist**

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