

Ackerman, Jeffrey A - DNR

From: Ackerman, Jeffrey A - DNR
Sent: Friday, August 20, 2021 2:30 PM
To: treese@the-reese-group.com
Cc: sw@millenniumforms.com
Subject: Millennium Forms Site Investigation Work Plan - request for revisions and clarifications

Hello Tina,

I reviewed the [workplan](#) you submitted on June 28 for the MILLENNIUM FORMS LLC, case #0265587693.

The contents of the workplan were compared to the requirements of sections NR 716.07 and NR 716.09, Wisconsin Administrative Code, and other associated regulations. I include relevant NR code section references in brackets below.

Based on my review, the following items need to be addressed before I can issue an approval:

1. The workplan is missing a scoping statement regarding the need to test for emerging contaminants, such as poly- and per-fluorinated compounds and 1,4-dioxane. [NR716.07]
2. The drilling methods should be described. [716.09(2)(f)1]
3. The plan should include a discussion of quality control samples, such as field blanks and duplicate samples. [716.09(2)(f)5]
4. The monitoring well development and groundwater sampling discussion is not clear with respect to your planned activities. The text should clarify, or address:
 - a. What type of pump will be used for the low-flow groundwater sampling? [716.09(2)(f)1]
 - b. Will you allow the monitoring wells to rest for a period following well development? [716.09(2)(f)1]
 - c. The code requirement is for eight groundwater sampling events. [726.09(2)(e)] You are only planning one. Explain your rationale and/or clarify your thinking.
5. Confirm the surveying methods will obtain the required accuracy (1-foot horizontal, 0.01 foot vertical). [141.065(2)]
6. Explain the details of the high volume vapor purge and sampling process, and associated quality control procedures. [716.09(2)(f)1 and 716.09(2)(f)5]
7. Confirm the Site Investigation Report will incorporate all relevant existing data, and not just the new information from the proposed sampling. Alternatively, include a discussion on how you will relate the new data to the existing data. [716.09(2)(f)8]
8. Also a request: Can you provide a map showing the Phase II data along with the proposed sampling locations to help put the proposed work into context?

Please make the needed revisions and clarifications to the workplan and re-submit it through the electronic portal at your earliest convenience, and no later than 60 days from now.

Feel free to contact me with questions.

Thank you.

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Jeff Ackerman, P.G.

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