Vitale, Matthew J - DNR

From: Miller, Anthony W. <awmiller@GFNET.com>
Sent: Friday, April 4, 2025 2:38 PM
To: Vitale, Matthew J - DNR
Cc: Bob Fuller; Hager, Jim; Leah Ziemba; Wright, Clifford C.; Payne, Chelsea J.
Subject: Response to WDNR Questions & Comments Regarding Work Plan for Proposed Sampling & Analytical Methods – WRR/PFAS (55929.007)

Matt –

We appreciate your quick review and comments on Gannett Fleming's March 11, 2025, Work Plan for Proposed Sampling & PFAS Analytical Methods. Please see my responses to your questions and comments in blue below and let me know if you have any additional questions.

Thanks, Tony

Anthony W. Miller, P.S.S. | Project Manager | Senior Environmental Scientist
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From: Vitale, Matthew J - DNR <Matthew.Vitale@wisconsin.gov>
Sent: Thursday, April 3, 2025, 2:14 PM
To: Miller, Anthony W. <awmiller@GFNET.com>
Cc: Bob Fuller <bfuller@WRRES.com>; Hager, Jim <hagerjl@wrres.com>; Leah Ziemba <lhziemba@michaelbest.com>; Wright, Clifford C. <cwright@GFNET.com>; Payne, Chelsea J. <cpayne@GFNET.com>
Subject: RE: Submittal Confirmation - BRRTS: 02-18-587957 Work Plan for Proposed Sampling & PFAS Analytical Methods - WRR (55929.007)

Tony,

I am reviewing the request to use the HydraSleeve and alternate PFAS sampling methods. I had a productive discussion with some of our specialists, and there are a few questions before I can grant the request.

1. The submittal mentions Gannet Flemming has used HydraSleeves on other sites. Can you share a few examples? Have they been used by GF for PFAS sampling before?
   Gannett Fleming (GF) field staff have used HydraSleeves (HSs) to collect groundwater (GW) samples at the National Presto Industries (NPI) Superfund site (BRRTS #02-09-000267) in Eau Claire for:
   - PFAS in Aug and Dec 2018, when Howard Caine/USEPA and Mae Willkom/WDNR were the agency project managers.
   - Dissolved cadmium and VOCs in select monitoring wells/piezometers since Jun 2011. Currently, Glenn Lautenbach/USEPA and you are the agency project managers.

2. ITRC's review of Hydrasleeves includes a few limitations to consider. Do these apply to the WRR site?
   - Residence time of the HydraSleeve depends on aquifer and well flow conditions. **How long is GF planning to leave samplers in the wells? 24-hrs? The full time between sampling events?** GF plans to install the HSs about 1-2 weeks before the upcoming groundwater sampling event in May 2025. New HSs will be installed after each round of samples are collected and will remain in the

wells until the next sampling event, when they will be replaced with new HSs again after those samples are collected.

- Sample volume may be limited to the amount of water in the saturated screen and the size of the selected sampler device. For 2-inch wells, the maximum sampling volume is 1.5 liters; for 4-inch wells, the maximum sampling volume is 2.1 liters. **Will this be manageable with wells where PFAS + VOCs + 1,4-Dioxane, + MNA parameters are collected?** GF plans to collect the PFAS, VOC, and 1,4-Dioxane (1,4-D) samples using the HSs in most wells/piezometers. However, if a well is having MNA parameters measured, then GF plans to use a peristaltic pump to collect all parameters, including PFAS, VOC, and 1,4-D, so that MNA parameters can also be measured in the field and lab samples. Currently, only eight wells located in or downgradient of areas that were injected with reducing reagents are routinely sampled for MNA parameters – W-32 through W-36 and SVE-4 through SVE-7.
- 2-liter samplers that are 5 feet long may pose logistic challenges during retrieval and when filling sample bottles. GF is aware that there may be some logistical issues with the long HSs, so we plan to use two field staff to collect those samples.
- Special considerations should be taken when evaluating using at sites with NAPL. **Any NAPL present?** To date, NAPL has not been encountered in any of the wells or borings sampled at this site, and we don't expect that will be an issue in the future.
- Sampler handling and transfer to sample jars may need two technicians and may be challenging due to the nonrigid nature of device and spillage. Understood – GF plans to use two field staff to collect the HSs samples if/when warranted.

  From <https://psu-1.itrcweb.org/5-passive-sampling-technologies/#5_1>

3. Will the smaller analyte lists of Method 8327 and 537M cover the PFAS compounds detected in the previous sampling at WRR? Yes and no. Except for some of the soil samples collected in December 2023, which were analyzed using ASTM D7968, all previous samples were analyzed for PFAS using 537M, so all those compounds would be included in future analysis using that method. Soil and groundwater samples collected from borings and temporary wells during future site investigation activities would be screened in the laboratory using Method 8327, which includes the list of compounds as ASTM D7968. The screening sample results would primarily be used to determine areas where no/low or elevated PFAS are present in the soil and groundwater. PFAS concentrations measured in the screened samples would be used to determine if additional samples would be submitted from that boring, sample interval, or temporary well for screening using the Method 8327 or for additional analysis using other methods discussed in GF's attached March 11, 2025, work plan. As discussed in that work plan, all groundwater, surface water, and private water well samples collected during the upcoming groundwater monitoring event scheduled for May 2025 would be analyzed using Method 1633. See the list of compounds included with each analytical method in Attachment C of the March 2025 work plan.
4. Is GF planning to replace *all* groundwater monitoring at the other WRR site, BRRTS # 02-18-000274 with the HydraSleeve? No. Groundwater samples from the groundwater recovery wells, the MNA wells listed above, and WRR's production well (PW-1) and drinking water well (DW-1) will be collected using bailers, peristaltic or dedicated submersible pumps, as has been done in the past.

Matthew Vitale
Pronouns: He/Him/His
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Matthew.Vitale@wisconsin.gov

From: Miller, Anthony W. <awmiller@GFNET.com>
Sent: Tuesday, March 11, 2025, 2:20 PM
To: Vitale, Matthew J - DNR <Matthew.Vitale@wisconsin.gov>
Cc: Bob Fuller <bfuller@WRRES.com>; Hager, Jim <hagerjl@wrres.com>; Leah Ziemba <lhziemba@michaelbest.com>; Wright, Clifford C. <cwright@GFNET.com>; Payne, Chelsea J. <cpayne@GFNET.com>

Subject: Submittal Confirmation - BRRTS: 02-18-587957 Work Plan for Proposed Sampling & PFAS Analytical Methods - WRR (55929.007)

Matt –

Attached is a copy of Gannett Fleming, Inc.'s *Work Plan for Proposed Sampling & Analytical Methods* to be used during the next phases of PFAS investigation and monitoring at the WRR Environmental Services, Inc. site in Eau Claire (BRRTS: 02-18-587957). A copy of the work plan was uploaded to the WDNR's portal (see email confirming submittal below) and a hard copy with check will be mailed to you today. Please review the work plan and let me know if you have any questions or need additional information to complete your review.

Thanks, Tony

Anthony W. Miller, P.S.S. | Project Manager | Senior Environmental Scientist
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Phone: O 608.327.5041 **C** 608.354.7730 | awmiller@gfnet.com

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From: no-reply@wisconsin.gov <no-reply@wisconsin.gov>
Sent: Tuesday, March 11, 2025, 2:13 PM
To: Miller, Anthony W. <awmiller@GFNET.com>
Subject: 0218587957: Site Investigation Workplan (NR 716)

Please do not reply to this email.

Dear Anthony Miller

Thank you for your submittal.

Confirmation Number: 46926
BRRTS #: 0218587957
Site Name: WRR ENVIRONMENTAL SRVCS PFAS INVESTIGATION
Type of Report: Site Investigation Workplan (NR 716)
Fee Amount: 700.00
Name: Anthony Miller
Company: Gannett Fleming
Other DNR RR Contact: NA
PFAS - This submittal contains:

- A workplan proposing or discussing a field investigation or sampling of PFAS.

Vapor Intrusion - This submittal contains:

- None, submittal does not include new vapor data or Vapor Mitigation System Inspection Log.

Additional Information: Hard copy of work plan and check will be mailed on March 11, 2025.

If you are paying a fee please send a check and a copy of this confirmation email to:

DNR Service Center
Attn: HAYLEY SCHNAE
1300 W CLAIREMONT AVE
EAU CLAIRE 54701

The DNR will not begin review of an incomplete submittal. The submittal is considered complete when both the fee (when applicable) and an electronic copy of the document or report are received, per Wis. Admin. Code § NR749.04 (1) and § NR 700.11 (3g) respectively.

For more information please see the Guidance for submitting Documents to the Remediation and Redevelopment Program (RR-690).

If you have questions please contact:
HAYLEY SCHNAE
hayley.schnae@wisconsin.gov
(715) 456-1720

Be reminded that site investigations shall include an evaluation of hazardous substance discharges and environmental pollution including emerging contaminants in accordance with Wis. Admin. Code §NR 716.07, and evaluations shall be submitted as part of scoping to the Department in accordance with Wis. Admin. Code §NR. 716.09(2)(d).