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ENVIRONMENTAL CONSULTATION & REMEDIATION

KPRG and Associates, Inc.


COMMENT RESPONSE LETTER

February 27, 2020

RECEIVED

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Mr. Mark Drews, P.G.
Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188

BY: 

VIA E-MAIL and FEDEX

KPRG Project No. 11717

Re: Former Navistar/RMG Foundry – Response to 2/20/20 E-mail
BRRTS # 02-68-098404

Dear Mr. Drews:

On February 3, 2020, KPRG and Associates, Inc. (KPRG) submitted an Injection Exemption Request and a WPDES Discharge Management Plan for Remediation as part of planning for an upcoming groundwater treatment injection pilot test at the above referenced facility. On February 20, 2020, after reviewing the WPDES Discharge Management Plan for Remediation, you issued an e-mail with five questions and/or comments. Each item is addressed below.

WDNR Item 1: Why is the pilot test injection zone from 20-60 feet bgs and not shallower?

Response: Based on boring logs from monitoring wells MW-23, MW-24 and MW-30, depth to bedrock in the vicinity of the proposed injection pilot test is 15' (MW-23 and MW-24) and 17' (MW-30) feet below ground surface (bgs) with water levels approximately coincident with the top of bedrock. Therefore, the main groundwater impact plume beneath this portion of the site is within bedrock. In order to get a good seal at the top of rock for focused injections, it was decided for the purposes of this injection pilot test to seal off the approximate upper 5 feet of bedrock so that short-circuiting will not occur at the weathered bedrock interface which will allow for a better understanding of the injection radial dispersion from the injection point through the local fractures. It is noted that this does not preclude including some injection at the bedrock interface as part of subsequent full-scale plume injection design.

WDNR Item 2: Is well MW-23D a new proposed well to be installed just for the pilot test? If yes, what screened interval will the well have?

Response: This well was already installed specifically for the purposes of this injection pilot test. It was constructed as a multi-port well with sampling port intervals from 25'-30', 35'-40', 45'-50'

and 55'-60'. All four intervals will be monitored as part of the injection pilot test. The well will be labeled MPW-23D as opposed to MW-23D to highlight that it is a multi-port well.

WDNR Item 3: Are you planning to monitor MW-30 during and after the injection? If not, I would suggest to add the well to the monitoring since that well has the highest TCE concentrations.

Response: Yes, it was intended to include well MW-30 within the pilot test sampling program. It was inadvertently not included in the list of wells to be monitored within the WPDES Discharge Management Plan for Remediation submittal.

WDNR Item 4: Is there any concern about pushing the contaminants into the storm sewer or sanitary sewers?

Response: No. Within the area of the pilot injection test, the sanitary and storm sewers are located shallower with the bottom invert elevation being approximately 4-9 feet above the top of groundwater which is approximately coincident with the top of bedrock in this area (see Response to Item 1). Injections will be via packered intervals starting at 20 feet bgs and extending to 60 feet bgs.

WDNR Item 5: Provide a Remedial Action Plan prior to implementation of the full-scale remediation.

Response: Yes. If the results of the proposed pilot test indicate good treatment results, an Interim Remedial Action Plan (IRAP) focusing on full-scale groundwater injection design will be developed and submitted to WDNR.

Navistar will continue to voluntarily complete the site investigation and appropriate remedial action activities for the site. If there are any questions, please contact Ferdinand Alido of Navistar at 331-332-6364 or Richard Gnat of KPRG at 262-781-0475.

Sincerely,
KPRG and Associates, Inc.



Richard R. Gnat, P.G.
Principal



Joshua Davenport, P.E.
Sr. Engineer

cc: Ferdinand Alido, Navistar (e-mail only)
Beata Rodriguez, Navistar (e-mail only)