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To: [Alido, Ferdinand](#)
Cc: richardg@kprginc.com; [Drews, Mark D - DNR](#)
Subject: Navistar Interim Groundwater Remediation
Date: Thursday, April 1, 2021 10:45:28 AM
Attachments: [image001.gif](#)
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Ferdinand and Rich,

The Wisconsin Department of Natural Resources (DNR) has reviewed the "Groundwater Remedial Action Options Memorandum" dated March 3, 2021 and is requesting additional information. DNR generally agrees with the remediation proposal but has the following comments and is requesting the additional information listed below:

- DNR is concerned that the contaminant plume may be pushed towards wells MW-39, MW-27 or further north towards the new apartment buildings. Explain what measures should be taken to prevent further plume expansion due to the injection. Proposal states that pilot test indicated that the injection moved higher concentrations towards the northwest. A more complete evaluation of all wells in the northern area (on property and off property) should be provided to determine the full extent of plume movement. Should the injection rates be lowered in the northern portion of the site? Additional evaluation of projected movement of plume from MW-13/15 area and how that is currently being monitored - comparison of depth of wells (well screens) should be included in this evaluation.
- The proposal and evaluation of data should be supported by figures and cross sections. Cross sections should identify unconsolidated material, bedrock (and competency observations if available), water table depth, well screen depths, recent groundwater concentrations, and ground surface. Figures should identify monitoring wells to be used in the injection monitoring. Provide at least one figure with groundwater data for all these wells over the last year, to support evaluation of pilot test impacts.
- Provide a detailed description of injection plan, including timing and progression plan for injections and how this will be monitored to ensure plume expansion is not being caused. Identify potential receptors in the path of possible plume expansion and any potential impacts to be monitored.
- What other piezometers/monitoring wells exist at the MW-9D depth to monitor whether plume expansion is being caused at this depth?
- Evaluate other indirect field measurements that can be used to more quickly determine whether injections are causing plume movement. Propose to use these measurements during and immediately following the injection to provide indication of plume movement. Provide a schedule and identify the wells to be monitored. Show on a figure the monitoring wells to be used to monitor the injection.
- Provide emerging contaminants\PFAS scoping statement which must be reviewed before the injection approval can be provided.
- Submit an injection approval request and WPDES permit application.
- Monitor the Hobo Spring during the injection event and in subsequent groundwater

monitoring events to determine whether there are any impacts. Provide a contingency plan for the spring if impacts occur.

Provide the above information and DNR will provide a new response for the above request. Please call or e-mail me if you have additional comments or questions.

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Mark Drews

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