

**From:** [Nave, Bradley S](#)  
**To:** [Richard, Philip E - DNR](#); [Saari, Christopher A - DNR](#)  
**Cc:** [Pooler, Cary](#); [Schmidt, Eric](#)  
**Subject:** 5-25-2022 WDNR and Chemours Meeting Recap  
**Date:** Wednesday, June 1, 2022 9:44:49 AM  
**Attachments:** [Barksdale 2022 Presentation to WDNR 5-25-2022.pdf](#)

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Greetings Phil and Chris:

Thank you for taking the time to meet virtually with Cary Pooler and me last week regarding the investigation and remediation progress at the Barksdale site. I have attached a portable document format (PDF) file of the slide deck we referenced during the call and per Phil's request, this email documents the highlights of our discussion, which are outlined below.

**1. WisDOT Soil Grading at Hay Barn Area**

- a. Bretting Development Corporation (BDC) representatives are aware and in agreement with grading plan. Official notification to occur this month.
- b. A plan for inspection of the soil after grading is under development.
- c. Plan will be simplified.
- d. Plan will be temporary until Use Area or site closure at which time the need for continued inspections will be revisited.
- e. Erosion control after initial grading will be per the existing WPDES permit for the site.
  - i. Annual inspections thereafter – after snow melt, when vegetation is dormant and a potential for erosion is greater.
  - ii. Grading and reseeded will be conducted if necessary based on inspections.
- f. Plan will include internal notice with Bretting Development Corporation for any change in area conditions (BDC).

**2. Near-Term Reports to WDNR**

- a. The annual hazardous waste remediation variance (HWRV) progress report was sent on 5/31/2022 - due date of June 1 each year.
- b. Annual site investigation and remediation progress report will be transmitted late in the week ending June 3<sup>rd</sup> or early the following week.
- c. Current conditions report for Use Area PAJ will be transmitted in late June or early July timeframe.
  - i. Completion of investigation and remediation of Use Area PAJ warrants revisiting approval of site-specific residual contaminant levels (SSRCLs).
  - ii. WDNR stated this would make sense and that Erin Endsley would provide WDNR risk assessment support.

**3. Site Investigation/Bio-Pilot/Remedial Technologies**

- a. Significant milestones achieved in the last field season are listed below and were documented at a high level in the December 2021 public mailer that WDNR reviewed:
  - i. Completed investigation and remediation of Use Area PAJ.
    1. All samples below SSRCLs for recreational use or even more conservative non-industrial criteria in many cases.
    2. Reporting to occur as mentioned above via CCR.
  - ii. Constructed the heating cell permitted in the last HWRV modification and completed first phase of soil heating test on unaffected soil.
    1. Discussed graph in attached presentation file.

- 2. Path forward in 2022 is to test affected soil and refine process.
  - b. HWRV permit expires in 2023.
    - i. Chemours wants to engage in the near-term regarding future planning and action items.
    - ii. Interim remedial action plan is dependent on success of the continued heating testing in 2022.
4. **Open Discussion**
- a. Discussed WDNR site visit later in the field season now that COVID restrictions for the agency are less stringent.
    - i. Chris mentioned that Phil is taking on a new case assignment and that his availability may be subject to change.
  - b. WDNR requested that we search for some old files related to an open records request they received.
    - i. Chris sent email on May 26 that identified which files WDNR needed to replace several that were stored on a damaged disc.
      - 1. Barksdale 1999 Groundwater Monitoring June 2000
      - 2. Barksdale Works Resident Well Sampling 4/04, Report & Appendix A
  - c. Discussed timing for the next update meeting and late October/early November was selected.
  - d. It was agreed that discussions related to the SSRCLs should occur in mid to late July.
  - e. Conceptually identified late June as a good time for an initial meeting regarding the path forward discussion for HWRV and IRAP.

Please let me know if you have any questions or comments regarding the above. We will send invitations related to the above referenced meetings in the near-term.

Thanks again for your time last week.

Sincerely,

Brad

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# Barksdale 2022 Site Investigation and Remediation Plans

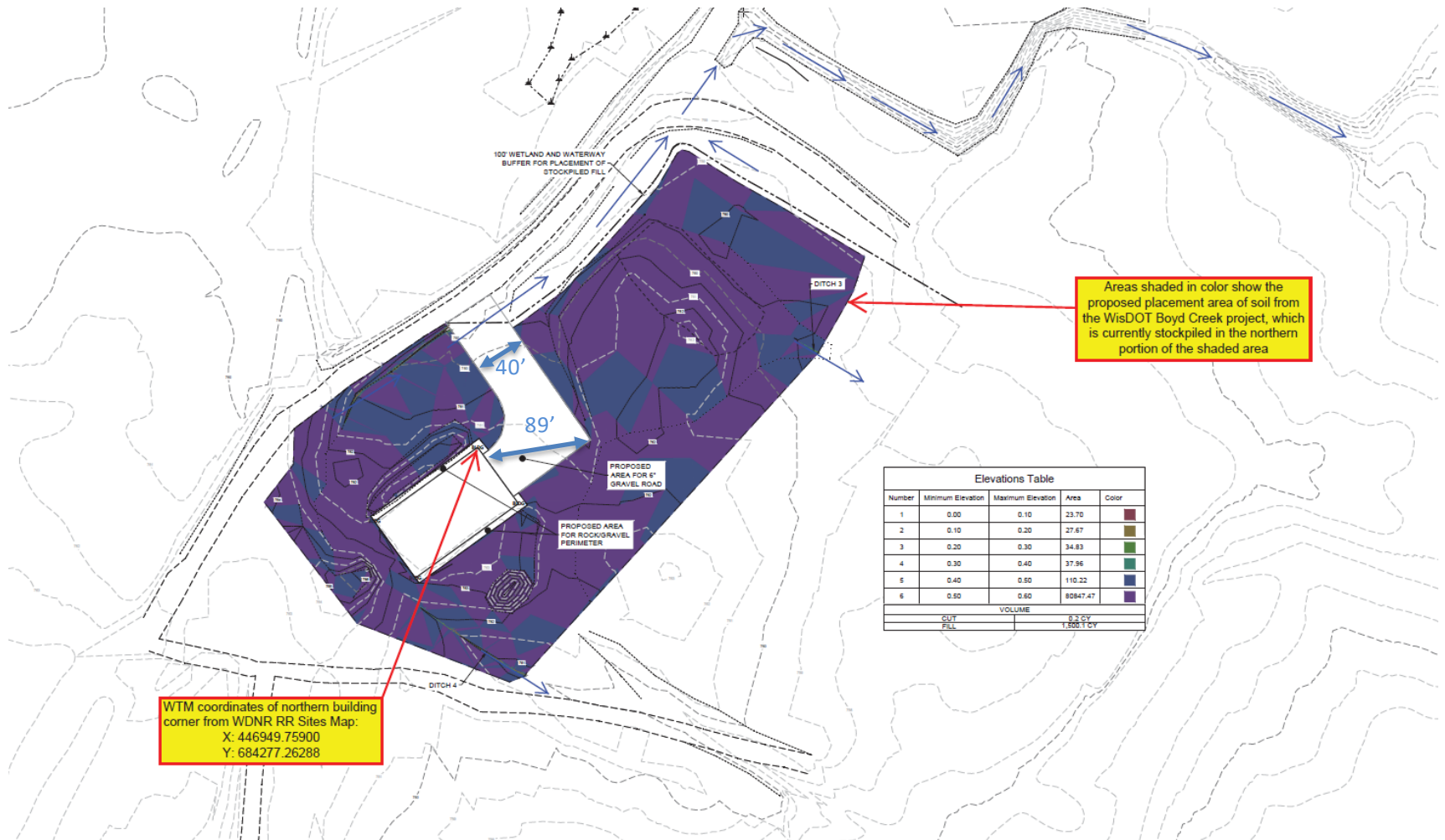
May 25, 2022

# Chemours Barksdale

## 2022 Planned Work Summary

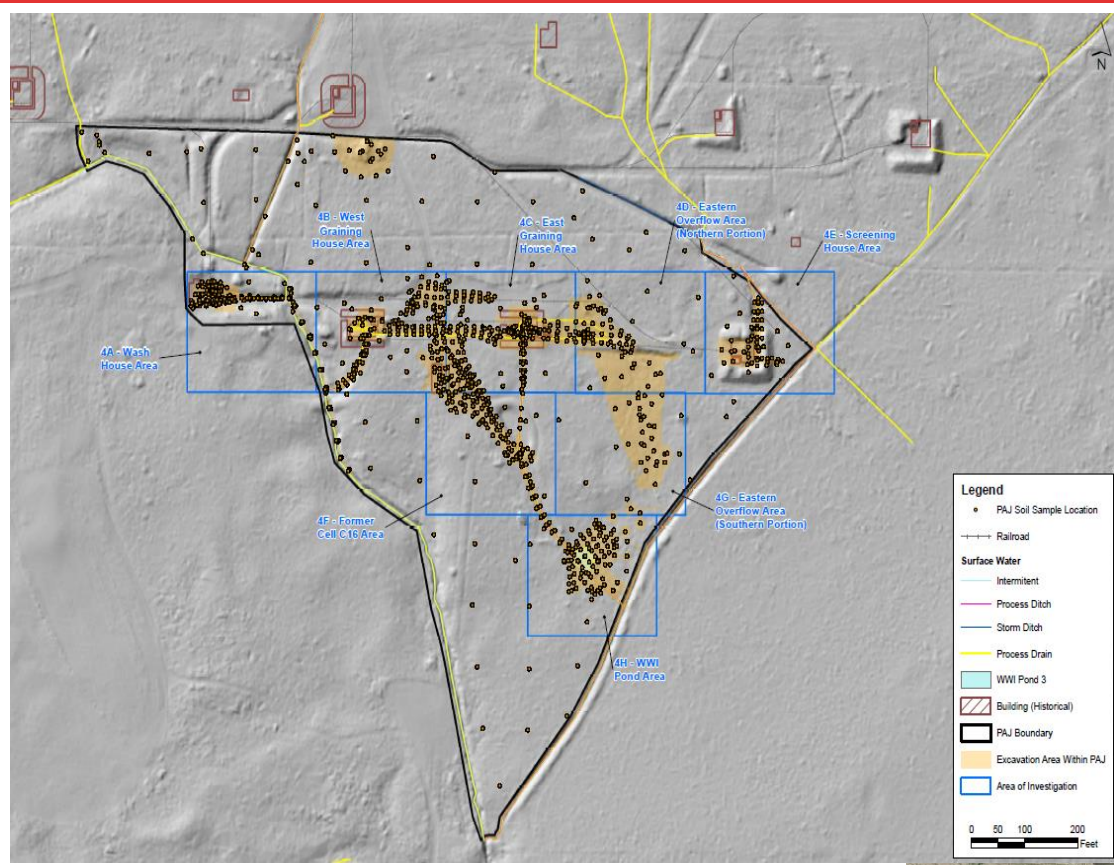
- WisDOT Soil Grading
  - Erosion maintenance plan under development
- Reports to Agency
  - Hazardous Waste Remediation Variance (HWRV) progress report (annual)
  - Site investigation progress report (annual)
  - PAJ Current Conditions Report (CCR) Update
    - Documents remediation of Use Area PAJ to recreational criteria
    - Will support a No Further Action (NFA) request to WDNR for continued recreational use
- Planned Site Investigation Work
  - Perimeter sediment and surface water sampling
    - Completed – in process at the lab
  - Excavation focus is in Use Area PAH & cell C12 in western area
    - C12 to support continued soil heating pilot
- Soil Heating and Continued Bio-Pilot Work
  - Construct new cells, as needed to support site investigation.
    - Near heating cell and in PAH
  - Continue soil heating test

# WisDOT Soil Grading

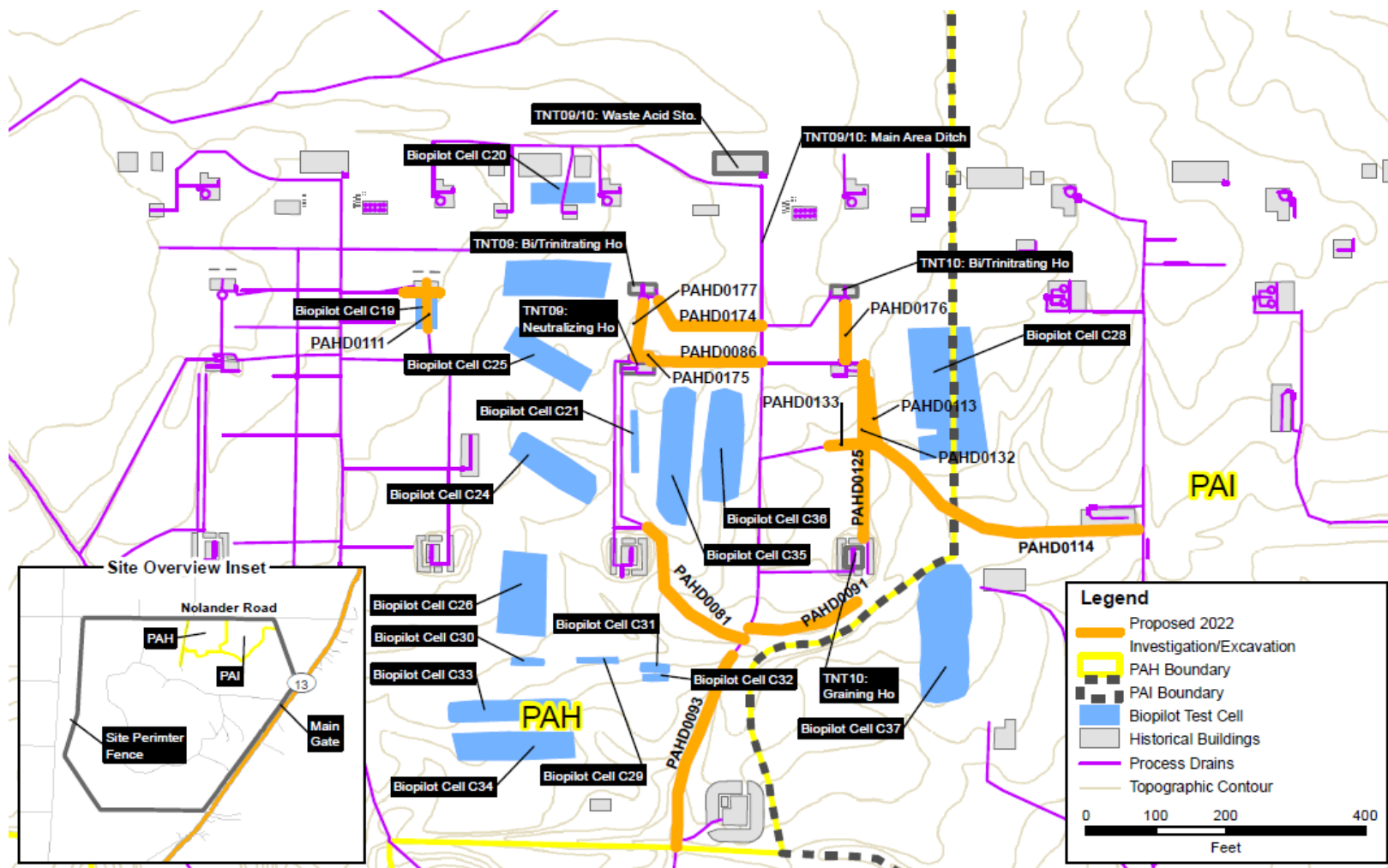




# Use Area PAJ CCR



# Use Area PAH - 2022 Work Summary





# Soil Heating Pilot





# Soil Heating Pilot - Performance

Internal Heating Cell Temp Trends  
Barksdale Soil Heating Pilot

