Message

From: Mikalian, Charles [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1216B33DD74E4765879B195C82564527-CMIKALIA]
Sent: 8/27/2018 6:00:53 PM
To: steve.elmore@wisconsin.gov
Subject: Talking Points for September 4 Meeting

If EPA were to issue a SDWA 1431 Order, it would expect to address the following five topics:

1) Investigation and sampling to identify the universe of impacted wells that are downgradient of the AGC fields;

   In the "study area," there are as many as 1,000 residences that have not been addressed by EPA or County sampling. It's unknown how many of those residences have drinking water wells. The Coalition needs to develop and implement a methodology and schedule for outreach to the residences and for the sampling of any drinking water wells at those residences.

2) mitigation of the public health risk (options include providing bottled water, installation of treatment, drilling new wells, etc.);

   The Coalition needs to offer bottled water, and to offer installation and maintenance of well treatment systems, to all residences with wells (either currently owned or newly identified) with nitrate contamination above 10 mg/l. For wells not susceptible to treatment systems, the bottled water commitment should continue until the groundwater collected at the residence no longer exceeds health-based standards, as evidenced by repeated quarterly sampling.

3) maintaining any remedy until the levels in the source water are below health standards;

   Provision of bottled water or maintenance of treatment systems to ensure effective treatment must continue until the groundwater collected at a residence no longer exceeds health-based standards, as evidenced by repeated quarterly sampling.

4) monitoring of the remedy to ensure that it is remains effective in the future, as long as groundwater levels are above health-based standards;

   For wells at which treatment systems are installed, the Coalition should monitor the drinking water exiting the treatment system on a quarterly basis to ensure treatment system effectiveness. Such monitoring shall occur until the Coalition demonstrates, on the basis of repeated quarterly sampling, that the groundwater at that well no longer exceeds health-based standards.

5) monitoring of wells downgradient of the AGC fields to ensure wells do not become affected in the future.

   All down gradient wells without treatment systems should be periodically monitored to determine whether the groundwater collected in those wells exceeds health-based standards. Offers for bottled water and well treatment/well replacement must be made to the owners of each newly identified well with nitrate contamination exceeding health-based standards.

In addition, we have identified at least the following additional issues to discuss at the meeting:

6) geographic scope of the MOU
7) status of treatment system approval

If you can think of more topics, please add them to this list. We should send to the County and to the Coalition as soon as possible. I am waiting from direction from my management on sending these talking points to the Coalition.

Thanks, Chuck

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