

From: Krueger, Sarah E - DNR
Sent: Thursday, June 24, 2021 4:38 PM
To: Andrew G Cawrse
Cc: Dombrowski, Frank J; Brian G Hennings
Subject: RE: BRRTS Activity 02-45-000042 APPLETON CTY (COAL TAR) MGP - Well Abandonment

Good Afternoon Andrew,

MW-10 can be abandoned, and at this time not replaced as the well is likely to be damaged or lost as part of construction and did not historically have impacts. Being that MW-10 is one of the upgradient wells and hasn't been sampled for SVOCs or VOCs since 1997 I recommend collecting a final round of sampling prior to abandoning MW-10. The sampling could occur immediately prior to abandonment. Please be aware that there may be a need in the future to have a well installed in the vicinity of the former MW-10 location.

Thank you,
Sarah

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Sarah Krueger, P.G.

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From: Andrew G Cawrse <Andrew.Cawrse@ramboll.com>
Sent: Thursday, June 24, 2021 11:53 AM
To: Krueger, Sarah E - DNR <sarah.krueger@wisconsin.gov>
Cc: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>; Brian G Hennings <Brian.Hennings@ramboll.com>
Subject: BRRTS Activity 02-45-000042 APPLETON CTY (COAL TAR) MGP - Well Abandonment

Hi Sarah,

On behalf of Frank Dombrowski, please see the well abandonment request below for the Former Appleton MGP site:

The City of Appleton is planning to construct a temporary gravel access road from West Water Street down to the Fox River on the City owned property located southwest of the former Appleton MGP site. Monitoring well MW-10 is located directly in line with the curb cut/driveway opening for the access road so the City is requesting that MW-10 be converted to a flushmount well or abandoned. Due to utilities and the location of the existing driveway opening, the City is unable to relocate the access road. As such, we are requesting to abandon well MW-10. The following background information has been provided for MW-10:

- MW-10 was installed in approximately 1995 on the southeast side of West Water Street on the former WWTP property (see attached Figure 2). We were unable to locate information (boring logs, well construction forms, etc.) related to the installation of MW-10.

- The exact well screen elevation is unknown; however, the total depth of MW-10 is around 28 feet which is a similar depth to shallow well MW-19S located 250 feet to the northeast (see attached Figure 2). Both wells MW-10 and MW-19S monitor shallow groundwater upgradient of the former MGP Site.
- MW-10 was sampled for VOCs and SVOCs in 1996 and 1997. SVOCs were not detected either year. The only VOC detected in 1996 was chloroform which was detected at concentrations (11 ug/L) exceeding the Enforcement Standard. VOCs, including chloroform, were not detected in the sample collected in 1997.
- MW-10 was sampled for chloride, cyanide, sulfate, and field parameters from 2001 through 2003. Chloride, cyanide, and sulfate were all detected at concentrations below the Preventive Action Limit.
- MW-10 was unable to be located following the August 2003 sampling event. The well was relocated following the demolition of the WWTP in 2012.
- NAPL has not been observed in MW-10.
- MW-10 is one of four wells (along with MW-8, -9, and -19S) north of the Fox River Canal that are only being monitored for groundwater elevations. Elevations continue to be collected to monitor groundwater in the shallow subsurface outside of the ISS Treatment Area (see attached Figure 2).

Justification for abandoning MW-10:

- There is a high likelihood of the well becoming lost/damaged during construction and use of the access road if it is converted to a flushmount.
- Contaminants of concern were either not detected or detected at very low levels during the groundwater sampling events. In addition, NAPL has not been observed in this well.
- MW-10 is only used for water levels, no groundwater parameters are analyzed at this well. Nearby well MW-19S also monitors shallow groundwater and water levels will continue to be collected from this well.
- The water level information collected from MW-10 is not used for creating groundwater contours provided in the Annual Reports for the site.

Based on the above information, it is our opinion that well MW-10 may be abandoned without replacement to accommodate the City's access road and are therefore requesting WDNR's approval to proceed with well abandonment. Also, please note that the City is planning to start construction soon so a response in a timely manner would be much appreciated.

Thanks,

Andrew Cawrse

Environmental Scientist

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