



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

January 6, 2015

Tauren Beggs  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, WI 54313

RE: ARARs for Aniwa Arsenic Site

Dear Mr. Beggs:

U.S. EPA's Emergency Response Branch is preparing to mitigate the threats posed by abandoned arsenic pesticides at the Aniwa Arsenic Site located on Marsh Road between the Towns of Aniwa and Birnamwood in Shawano County, Wisconsin. The U.S. EPA has conducted an investigation and determined that the property owner, the Town of Aniwa, is not able to conduct the necessary clean up. Additionally, U.S. EPA has determined that conditions at the property present an imminent and substantial endangerment to public health, welfare, or the environment.

U.S. EPA proposes the following actions to address the threats posed by the elevated concentrations of arsenic in the surface and sub-surface soils as well as the groundwater at the Aniwa Arsenic Site:

1. Develop and implement a Site-specific Health and Safety Plan, an Air Monitoring Plan, an Emergency Contingency Plan, and a Site Security Plan;
2. Conduct test trenching and field screening to identify the location and source of residual arsenic pesticides remaining at the Site;
3. Excavate and properly dispose of abandoned pesticide materials and associated containers buried at the Site as well as surface soils and subsurface soils that exceed the Arsenic Removal Management Level (RML) for residential soils (67 ppm);
4. Collect and properly dispose of contaminated groundwater generated during excavation activities;
5. Backfill excavated area with clean material;
6. Restore excavation area with vegetative cover;

7. Design and install a water treatment system (e.g., Reverse Osmosis Point of Entry system) for any residences that EPA finds have been affected by groundwater contamination from the site such that arsenic concentrations exceed or are reasonably expected to exceed the Arsenic Maximum Contaminant Level (MCL), 0.010 ppm, in the near future; and
8. Perform any other actions to investigate and address contamination on the property that EPA may determine to be necessary.

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

It is U.S. EPA Region 5's policy to request that WDNR identify any state applicable or relevant and appropriate requirements (ARARs) which apply to this removal action. Any ARARs which you identify within 30 days will be complied with to the extent practicable. If you have any questions or comments, please contact me at 920-662-5424.

Sincerely,



Kathy Halbur  
On-Scene Coordinator