From: warren hohn < warrenhohn4919@gmail.com>

Sent: Thursday, April 2, 2020 2:57 PM

To: Beggs, Tauren R - DNR; Tammy@reschinsurance.com

Subject: Town of Aniwa 2020 Monitoring Plan

Attachments: 04022020_144414_Town of Aniwa 2020 proiposal.pdf

Tammy: This is what I sent to WDNR for comment. Warren Hohn

TOWN OF ANIWA ARSENIC DISPOSAL SITE GROUNDWATER MONITORING PLAN FOR THE YEAR 2020

Groundwater and soil monitoring done by the Town of Aniwa in the years 1989-2013 indicated groundwater dissolved arsenic levels were increasing especially during high water events in the monitoring wells found at the disposal site. Levels of dissolved arsenic were extremely high in monitoring wells next to the pit and down gradient to the southeast. The Town of Aniwa did not have the resources to clean up the site and applied to the Wisconsin DNR for remediation and closure assistance. Closure was denied by the WDNR. WDNR and the Town of Aniwa requested assistance from the Environmental Protection Agency (EPA) Emergency Response Branch in September 2014. From June 1-19, 2015 the EPA supervised/assisted the removal of 1,019 tons of pretreated arsenic contaminated soil to an EPA non-hazardous approved landfill in central Wisconsin.

A condition of the removal was the Town of Aniwa develop a groundwater monitoring plan for the years 2016-2019 for the 7 monitoring wells currently found at the site (B-10, B-11, B-12, B-13R, B-19R, B-20 and B-21) and the TIMM private drinking water well 300 ft. northwest of the burial pit. Monitoring done in 2016-2018 indicated the wells of most concern were B-12, B-13R and B-21 because of arsenic levels above 10 ug/L As. The TIMM private well was supplied with a arsenic treatment unit and is also monitored to make sure it is working properly.

All of the monitoring wells were sampled for the year 2019 including the TIMM private well in June 2019. Wells will be sampled for dissolved arsenic, field filtered and acidified with HNO₃. Additionally were monitored for depth to water, field pH, specific conductance, field temperature and the amount of water bailed from the wells. Further Wells B-10, B-11 and B-19R were sampled for dissolved lead. Lead levels appear to be background levels and arsenic was again high in B-13R (4970-4230 ug/L with high groundwater levels) The TIMM well was 3.4-6.1 ug/L As but lowered with proper maintenance. The bailings were put in a barrel in a secured small shed on site and disposed of properly. The samples were be analyzed by Pace Labs, Inc., Green Bay, WI., a WDNR and EPA certified water and wastewater lab.

Additional soil sampling was required in the area surrounding the EPA cleanup in 2015. Twelve composite soil borings were spaced 30 feet (9.1 meters) apart surrounding the perimeter originating @ Marsh Rd. and just south of the swamp to the north and on the eastern and western edges of the cleanup. Soil samples were taken with a 4 inch stainless steel bucket auger at 6 inch (15 centimeter) intervals to a depth of 2 feet (60 centimeters), similar to

sampling done in 1990. Samples were digested and analyzed for arsenic by Pace Labs, Inc., Green Bay, WI. (See Attached Map).

Sampling was done in June 2019 as the weather permitted. The goal of this sampling was to see if the existing site meets the WDNR Soil-Arsenic Background Threshold Value (BTV) statewide of 8ppm for surface soils in Wisconsin. 3 samples exceeded the threshold value on the western perimeter (38.1, 27.5, 31.6 ppm) west of the EPA cleanup area as well as the south east corner (30.6 ppm) by the original entrance and one in the northeast area (12.20 ppm) a total of 5 of the 12 borings. The area will be expanded in 2020 to see how much area of additional removal or capping will be required. See attached drawing.

Additionally, all of the monitoring wells currently found at the site (B-10, B-11, B-12, B-13R, B-19R, B-20 and B-21) will be sampled for the year 2020 including the TIMM private well in June 2020. Wells will be sampled for dissolved arsenic, field filtered and acidified with HNO₃. Additionally all will be monitored for depth to water, field pH, specific conductance, field temperature and the amount of water bailed from the wells. Results will be sent to Tauren Beggs, WDNR Northeast region hydrogeologist, Remediation and Redevelopment Division

WARREN A. HOHN CST# 227723 4/02/2020

SIGNED: Wanen A. Hohn

