



June 15, 2018

Reference No. 086165-05-09

Mr. Dan Harrington  
Wisconsin Department of Natural Resources  
810 West Maple Street  
Spooner, Wisconsin 54801

Dear Mr. Harrington:

**Re: Preliminary Wetland Excavation Plan  
Penta Wood Products Superfund Site  
Siren, Wisconsin**

On behalf of the Wisconsin Department of Natural Resources (WDNR), GHD Services Inc. (GHD) has prepared this letter providing a preliminary wetland excavation plan. Excavation is necessary to remove impacted soil and sediment from the wetland at properties adjacent to the Penta Wood Products Superfund Site (Site) located in Siren, Wisconsin. We request that the WDNR provide written confirmation that wetland permitting and mitigation is not required to complete the wetland excavation work. The wetland (designated as Area 29) and excavation location are shown on Figures 1 and 2.

### ***Background***

During 1999 and 2000, soil excavation work and associated sampling was conducted by CH2M HILL on behalf of the United States Environmental Protection Agency (USEPA). As documented in the Remedial Action Report (December 2000, CH2M HILL), the Area 29 wetland excavation was completed and confirmation soil samples were collected. However, following sample collection, a storm washed impacted material back into the wetland. The material was re-excavated, but confirmation samples were not collected. The impacted portion of the wetland is located within two separate parcels. Based on current Burnett County records, Mr. Erik Johnson is the owner of the property at Parcel Identification Number 07-006-2-38-17-11-4-01-000-011000 and Mr. Ken and Mrs. Sheri Nelson are the owners of the property at Parcel Identification Number 07-006-2-38-17-12-3-02-000-011000.

As of September 1, 2014, the WDNR assumed responsibility from the USEPA for continuing the remedial action at the Penta Wood Products Superfund Site. WDNR has retained GHD to conduct the remedial action. WDNR directed GHD to collect soil/sediment samples from the Area 29 wetland to confirm the results of the previous USEPA sampling and delineate the extent of the impacted area.

A total of 39 soil samples were collected on January 16, January 17, April 28, and May 1, 2017 from 15 soil boring locations. Samples were collected from the borings at depths ranging from the ground surface to 6 feet below the ground surface. The samples were submitted to an independent laboratory, TestAmerica Laboratories, Inc. of North Canton, Ohio, for analysis of pentachlorophenol (PCP). The soil sample locations are shown on Figures 1 and 2.



The soil sample PCP results are summarized below.

Sample Location	Sample Identification	Sample Depth (feet below ground surface)	Concentration (µg/kg)
GP-1	S-170116-PS-01	0	1200
GP-1	S-170116-PS-02	3	Not detected
GP-1A	S-170501-PS-22A	0	220J
GP-1A	S-170501-PS-22B	3	Not detected
GP-2	S-170116-PS-03	0	1700
GP-2	S-170116-PS-04	3	Not detected
GP-2	S-170116-PS-05	5	Not detected
GP-3	S-170117-PS-23	0	730J
GP-3	S-170117-PS-24	3	Not detected
GP-4	S-170116-PS-06	0	1400
GP-4	S-170116-PS-07	3	Not detected
GP-4	S-170116-PS-08	6	Not detected
GP-5	S-170116-PS-09	0	3200
GP-5	S-170116-PS-10	3	Not detected
GP-5	S-170116-PS-11	6	Not detected
GP-6	S-170116-PS-12	0	1500
GP-6	S-170116-PS-13	3	Not detected
GP-6	S-170116-PS-14	5	Not detected
GP-7	S-170116-PS-15	0	1100
GP-7	S-170116-PS-16	3	890
GP-7A	S-170501-PS-23A	0	350J
GP-7A	S-170501-PS-23B	3	Not detected
GP-8	S-170116-PS-17	0	360
GP-8	S-170116-PS-18	3	2700
GP-8	S-170116-PS-19	6	Not detected
GP-9	S-170116-PS-20	0	210J
GP-9	S-170116-PS-21	3	Not detected
GP-9	S-170116-PS-22	6	Not detected
GP-10	S-170428-PS-16A	0	4800
GP-10	S-170428-PS-16B	3	Not detected
GP-10	S-170428-PS-16C	6	72J
GP-11	S-170428-PS-17A	0	Not detected
GP-11	S-170428-PS-17B	3	Not detected
GP-12	S-170428-PS-18A	0	110J
GP-12	S-170428-PS-18B	3	Not detected
GP-12	S-170428-PS-18C	6	Not detected
GP-13	S-170428-PS-19A	0	110J
GP-13	S-170428-PS-19B	3	Not detected
GP-13	S-170428-PS-19C	6	Not detected



PCP was detected above the USEPA criteria of 900 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ) in eight of the soil samples. These soil sample results were generally consistent with the results previously reported by USEPA. However, a statistical evaluation of these results indicates that the soil/sediment within the sampling area requires additional measures to meet the cleanup objectives for the Site and surrounding properties.

#### *Preliminary Wetland Excavation Plan*

WDNR proposes to excavate the soil/sediment with PCP concentrations exceeding 900  $\mu\text{g}/\text{kg}$  within the wetland and remove the excavated material from the privately owned properties. The final disposition of the excavated material is yet to be determined. Disposal options include placing the material within the corrective action management unit (CAMU) on the Penta Wood property or transporting the material to an authorized offsite disposal facility.

The wetland excavation depth is expected to be less than 5 feet. The size of the excavation is expected to be approximately 1 acre. Assuming an average excavation depth of 3 feet, the estimated quantity of soil/sediment to be excavated is approximately 5,000 cubic yards. The expected excavation limits are shown on Figures 1 and 2.

Excavation would likely be conducted with tracked excavation equipment. Mats would be placed under the equipment to allow access across the wetland and to stay on top of the saturated soil/sediment. Mats would also be used to allow loaders to transport the excavated material out of the wetland. The excavation would proceed from the outer limits of the impacted area toward the south/west preventing the equipment from having to work in submerged conditions.

Silt fence would be installed along the perimeter of the working area within the wetland prior to beginning the excavation to help ensure that discharges outside of the excavation do not occur. It is preferred that the excavation be conducted during winter/frozen conditions to further reduce the chance of stormwater runoff and discharges.

The excavation would not be backfilled. It is anticipated that the excavation area would fill with water, creating a shallow pond, and vegetation would be allowed to be restored naturally. GHD has confirmed that the preliminary wetland excavation plan is generally acceptable to the property owners. More details would be provided to the property owners for their final approval after a specific plan is developed and approved by WNDR and USEPA.



We appreciate your cooperation and request that the WDNR provide written confirmation that wetland permitting and mitigation is not required to complete this wetland excavation work. If you have any questions, please contact me at (651) 639-0913 or Phil Richard (WDNR project manager) at (715) 762-1352.

Sincerely,

GHD

A handwritten signature in blue ink, appearing to read 'Tim Ree', with a stylized flourish at the end.

Tim Ree

TR/sb/1

Encl.

cc: Phil Richard, WDNR Park Falls (via email)  
Keith Patrick, WDNR Rhinelander (via email)  
Stephanie Linebaugh, USEPA Region 5 (via email)



Source: DigitalGlobe 2011



**LEGEND**

- ▲ EXTRACTION WELL NEST
- UNCONFINED MONITORING WELL
- SEMICONFINED MONITORING WELL
- ⊕ WATER SUPPLY WELL
- ⊙ BIOVENTING WELL
- ▲ SOIL GAS WELL NEST
- APPROXIMATE CAMU LIMIT
- SITE PARCEL BOUNDARY
- - - ADJACENT PARCEL BOUNDARY
- PRIOR EXCAVATION AREA



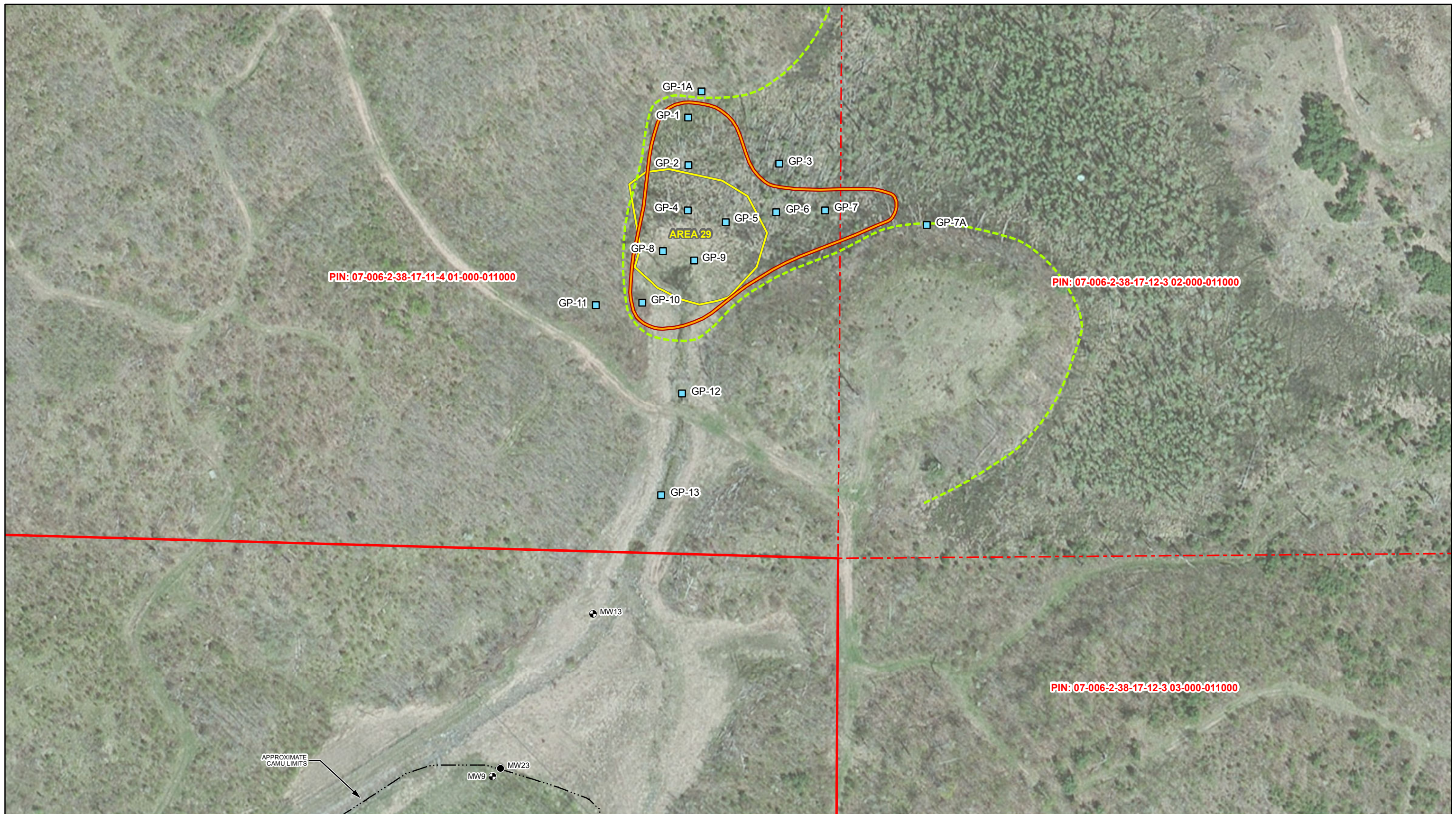
PENTA WOOD PRODUCTS SUPERFUND SITE  
SIREN, WISCONSIN  
PRELIMINARY WETLAND EXCAVATION PLAN

SITE PLAN

086165-05-09

Jun 14, 2018

FIGURE 1



Source: DigitalGlobe 2011



**LEGEND**

- SOIL SAMPLE LOCATION
- UNCONFINED MONITORING WELL
- SEMICONFINED MONITORING WELL
- - - - - APPROXIMATE WETLAND LIMIT
- APPROXIMATE EXCAVATION EXTENT
- - - - - PRIOR EXCAVATION AREA
- - - - - APPROXIMATE CAMU LIMIT
- SITE PARCEL BOUNDARY
- - - - - ADJACENT PARCEL BOUNDARY



PENTA WOOD PRODUCTS SUPERFUND SITE  
SIREN, WISCONSIN  
PRELIMINARY WETLAND EXCAVATION PLAN

WETLAND EXCAVATION LOCATION

086165-05-09  
Jun 14, 2018

FIGURE 2