March 26, 2013

Mr. Pat Hodgins
Director of Safety
West Shore Pipeline Company

Dear Mr. Hodgins:

On July 17, 2013 a West Shore Pipeline Company (West Shore) pipeline ruptured in the Town of Jackson, Washington County, Wisconsin releasing approximately 54,000 gallons of gasoline. Starting immediately after the spill and continuing since, West Shore has implemented numerous remedial actions and responses to minimize the effects of the spill to the environment and water supplies in the area. These actions include removing contaminated soil, installing groundwater, and soil vapor extraction wells, sampling private water supply wells and installing point of entry treatment systems at many water supply wells.

The gasoline release has caused contamination of the aquifer used by private wells near the spill. The contamination from the spill has caused this aquifer to become unusable as a water source for many years to come. For that reason, the Department of Natural Resources (Department) requested that West Shore evaluate alternate water supply options for homes in the affected area.

On January 4, 2013 Arcadis, an environmental consulting firm, submitted on behalf of West Shore a document to the Department titled “Phase 2 Evaluation Report for Long Term Water Supply Alternatives, Jackson, Wisconsin”. The alternatives presented in Arcadis report include:

- Connecting properties in the affected area to the Village of Jackson public water supply system with the properties being direct customers of the Village;
- Creating a new sanitary district to be operated by the Town of Jackson with the source of water being:
  - The Village of Jackson where the new sanitary district would operate as a consecutive system to the Village system, or
  - New community water supply wells constructed for the new sanitary district.
- Fill and seal the affected private water supply wells and replace them with deeper wells. The replacement wells would be constructed to serve up to six homes where possible, and where not possible individual wells would be constructed.

The Department has reviewed this report and we think that it adequately and properly identifies the most viable options for providing a sustainable long term water supply for the affected properties. Even though all of these three options are viable, we have the following comments regarding water supplies for this area:

1. The Department believes that a public water supply option represents the best option for providing a sustainable long term water supply for these homes. Public water supplies are sampled on a regular basis, maintained and operated by professionals, and have a proven record of providing safe water to millions of people in Wisconsin and across the country.
2. Any source of water for a public system will need approval from the Department. The two potential sources evaluated in the report are the Village of Jackson municipal system or new community water supply wells constructed into the deeper aquifer. The Department agrees with the Arcadis assessment that the option of having the Village act as the source of water can be implemented more quickly than installing new wells because all the water quality characteristics of the Village supply are known. New community wells would require installing a test well and completing extensive analyses to determine water quality and whether treatment of that water will be necessary. As to whether homes in the affected area are served directly as customers of an extended Village water system, or whether a new sanitary district is a consecutive system to the Village, the Department believes both are viable options and the choice made is a matter of negotiation between the Town and the Village.

3. The Department believes that replacing private wells, while viable, is less favorable than a public water supply option for the following reasons:
   a. The water quality in the deeper aquifer isn’t certain and may require treatment.
   b. Each well constructed through the Maquoketa Shale creates a potential conduit for contamination in the upper aquifer to move into the deeper aquifer. Specialized drilling methods would be utilized to minimize this potential but that potential is still greater than if the wells are not constructed.

4. The Department agrees that a public water supply system is the best choice for a sustainable long term water supply in this area. However, we do not agree with all of the aspects of implementing the public water system as mentioned in the report. One specific item that the Department won’t allow is the proposal to keep the higher pumping capacity wells in place, discontinuing their use as a potable supply, but installing treatment and allowing continuing use of the wells for non-potable purposes. All private water supply wells contaminated with gasoline will need to be filled and sealed.

The Department recommends you work with officials from the Town of Jackson to begin steps for creating a public water system to serve areas affected by the gasoline pipeline spill.

Thank you for your continued efforts to remediate the contamination and provide a sustainable long term safe source of water for the homes in this area. Please feel to contact me at 414-263-8570 with questions.

Sincerely,

Eric Nitschke
Southeast Regional Director

Cc. Mark Giesfeldt, DNR Remediation and Redevelopment Bureau Director
   Jill Jonas, DNR Drinking and Groundwater Bureau Director
   Lloyd Eagan, DNR Water Division South District Natural Resource Manager
   Rhonda Volz, DNR Drinking and Groundwater Natural Resource Manager
   Pam Mylotta, DNR Remediation and Redevelopment Natural Resource Manager