

To: DNR Secretary  
101 S. Webster St.  
PO Box 7921  
Madison, WI 53707-7921  
and DNR Service Center  
1300 W. Clairemont Ave  
Eau Claire, WI 54701

January 23, 2016  
Neil C. Koch  
N7238 520<sup>th</sup> St  
Menomonie, WI 54751  
1-715-235-4250  
hiltop5336@sbcglobal.net

and electronic mail to Dunn County Health, Dunn County PRD committee, area State legislators, and media

To Whom It May Concern

I have determined that there are about 150 septage (septic tank waste) landspreading sites in Dunn County that are located in areas that do not meet the percolation standards required in NR-113 which states that soil percolation rates greater than 6 inches per hour can not be used as septage landspreading sites. I feel that this may be the tip of the iceberg in that this may be a problem throughout the State.

To give you some background as to how I learned about this; I am a retired hydrologist and have been giving talks to educate people about groundwater and how to protect groundwater from being polluted and depleted. I now give power point talks about groundwater and three things that need to be done to have groundwater for the next generation. I organized the Dunn County Groundwater Guardian Community, one of eight in Wisconsin, which is a national organization. To be a part of this organization there must be an ongoing project. Our project was to develop a map showing recharge rates to the aquifer in Dunn County. I used 91 soil types and classified them into five groups from excellent, very good, good, fair, and poor recharge to groundwater. This map (entitled "Location of Recharge Areas to the Sandstone Aquifer in Dunn County, Wisconsin" by Neil C. Koch 2005) can be seen on the Dunn County website and is available from the Dunn County GIS Division. The Town of Menomonie in 2013 established an ordinance entitled "Groundwater Recharge Protection Overlay District Ordinance" which used the recharge map as the basis for protecting the groundwater. This ordinance does not allow septage landspreading sites to be located in the excellent and very good recharge areas in the Town of Menomonie. When locating about 400 septage landspreading sites in Dunn County I found about 150 sites in areas where the soil percolation rate was from 5 to 20 inches per hour. The soils used in the map were from a soil survey approved in 2004. The existing DNR sites may have been established using old soil surveys.

For the health and welfare of people using groundwater the DNR needs to reexamine all the sites in Dunn County (and probably in Wisconsin) and remove those that do not meet NR-113 standards. This will be difficult to do because there is only one DNR person in charge of septage landspreading for 17 Counties in northwestern Wisconsin. The county is allowed to take over septage landspreading; however the requirements listed in NR-113 are so demanding that no county would ever take on that responsibility.

It's amazing to me how one person can handle 17 counties? One way to handle this problem and eliminate state cost is for the State to pass legislation requiring septage pumped from septic tanks to be taken to nearby municipal waste water treatment plants. Michigan has such legislation but where there are no nearby municipal waste water treatment plants landspreading can still occur.

This situation was first brought to the public through an editorial published in the Dunn County News on July 5, 2013. In Wisconsin septage landspreading has resulted in health problems from people using groundwater in the area. It is time that the 150 sites in Dunn County and other sites in Wisconsin that don't meet standards in NR-113 are shut down. If you lived next to one of these sites you would quickly demand it be shut down. It is not right when we know there could be a health problem and we do nothing I would appreciate your help and cooperation in correcting this problem.

Sincerely,

Neil C. Koch  
Retired hydrologist