

rec 10/28/97



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Annex
4041 N. Richards Street, Box 12436
Milwaukee, WI 53212-0436
TELEPHONE 414-229-0800
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October 22, 1997

File: Grafton Lime Kiln General

Joan Underwood
Rust Environmental & Infrastructure
PO Box 1067
Sheboygan, WI 53082-1067

re:Request to Retain Potable Wells for Monitoring in Lime Kiln Park Investigation, Town of Grafton

Dear Ms. Underwood:

It is inconsistent with this region's policies to allow use of contaminated private wells for long-term monitoring. There are numerous problems which have arisen from this practice in the past, including:

1. Continued degradation of aquifer water quality due to migration of contaminants thru wells with large open intervals in rock formations,
2. "Orphaned wells", where years after personnel and owners have changed no one seems to know who is responsible for the disposition of the wells,
3. Access problems and lack of control of the site where owners capriciously object to disruption of landscaping, privacy etc. and engage in unauthorized well use.

I agree that these wells are an invaluable resource to gather information on zones of hydraulic conductivity etc.. It is indeed a shame not to use the opportunity they afford. Therefore, your request to study these wells is reluctantly granted, pursuant to Wisconsin Administrative Codes s.NR812.26 and s.NR812.43, *strictly conditional upon the following:*

1. That easement rights be obtained from each owner in a written, legally binding format, which clearly prohibits unauthorized use, allows access for testing etc., and specifies the duty of the Village and it's assigns to perform the proper abandonment of the well by October 1, 1998.
2. That after **October 1, 1998 any wells which are desired for long term monitoring obtain specific approvals to convert the well to a monitoring point consistent with the construction requirements of Wisconsin Administrative Code s.NR141.** This means that for any wells kept after this date it is expected that smaller diameter liners, grout seals and other measures will be proposed to restrict monitoring to discreet zones of the aquifer. This is intended to preclude contaminant transport within the borehole and to eliminate unauthorized residential use. Such reconstruction will require re-negotiation of long term easement rights from each property owner.



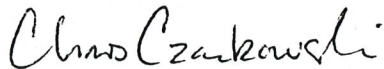
(Joan Underwood, Rust Environmental, October 22, 1997)

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It is this department's recommendation that these residential wells be properly abandoned and that site-specific monitoring wells be designed in publicly accessible right-of-ways.

Please submit the owner easement agreements for each of the proposed wells to this department no later than January 1, 1998.

Sincerely,



Chad Czarkowski

Drinking Water and Groundwater Specialist

c:DG/2 - Private

Mark Gottlieb - Village of Grafton
Charles Sweeney - Michael Best and Friedrich
Ken Theisen - EPA
John Feeney, WDNR
Sharon Schaver, WDNR
McCormack
Aldenhoff
Hospel
Indresano
Goetz
Uihlein
Rusch
Altenbach
Gandt
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