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RUST Rust Environment & Infrastructure Inc.

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December 10, 1997

Mr. John Feeney
Department of Natural Resources
4041 N. Richards Street
Box 12436
Milwaukee, WI 53212-0436

Re: Plan Approval Letter

Dear John:

On behalf of the Village of Grafton, I am writing in response to your Plan Approval letter dated December 3, 1997, for the Lime Kiln Landfill site in Grafton, Wisconsin. We have reviewed the letter and ask for the two conditions to be modified as discussed below.

The first condition which asks for the P2 well location to be drilled as a deep boring should be modified so that it will become a deep boring only after the upgradient well, landfill wells, and private wells have been sampled and sampling results are inconclusive on whether groundwater impacts are at least partly from the landfill. If this sampling is inconclusive, then P2 will be drilled as a deep boring. If this sampling indicates that the landfill does contribute to groundwater impacts, then deep information from this well is not necessary.

We believe deep information will not be necessary because constituents are likely to be mixed throughout the length of the open private wells, approximately 200 feet deep, and because the wells within the landfill will be the best indication of whether constituents are coming from the landfill. It is unlikely that we would find contamination deeper and not in the landfill wells. In addition, preferential flow zones will have been investigated both through the upgradient and private well sampling and if target zones exist, they will be identified.

If the proposed data collection does not indicate whether the Lime Kiln Landfill is a contributor to groundwater impacts, then a deep well may indicate whether an upgradient source may be the cause of impacts. This would be shown if cleaner groundwater exists above more impacted groundwater with depth. If nonimpacted groundwater is found beneath the site, it is likely that the landfill was not a significant contributor to the groundwater impacts.



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The second condition requests another deep well near the two quarry areas south of the known area of the Lime Kiln Landfill. We do not believe this well is necessary because these quarries did not receive waste. Quarry 2 (the middle quarry) was never filled and Quarry 3 (the southern-most quarry), appears to contain fill material but no waste based on the geophysical survey. We completed the geophysical survey proposed in the Work Plan so that it would be done prior to a significant snowfall. Results of the EM survey indicated an electrical signature not indicative of waste material in the areas of Quarries 2 and 3. We will confirm this through the geoprobe borings proposed in the Work Plan. Because these areas do not contain waste, we do not believe a deep, costly well installation is warranted at this time.

If you have questions concerning this letter, please do not hesitate to call me at 920-451-2465. Thank you for your review of these conditions.

Sincerely,

RUST ENVIRONMENT AND INFRASTRUCTURE



Joan E. Underwood, PG
Project Manager

c: Mark Gottlieb, PE; Village of Grafton
Buck Sweeney, Michael, Best, and Friedrich