



September 1, 2020

Ms. Amber Thomas  
Village of Grafton  
675 North Green Bay Road  
Grafton, WI 53024

Subject: Site Investigation Workplan Approval  
Grafton Lime Kiln Park and Lime Kiln Park Grafton Village, Green Bay & Falls Roads, Grafton  
BRRTS #: 02-46-549906, and BRRTS #: 02-46-000743

Dear Ms. Thomas:

On July 8, 2020 the Department of Natural Resources (DNR) received the report, *Site Investigation Workplan, Lime Kiln Park and West Plume Area*, from your consultant TRC Companies Inc. (TRC) with a fee and a request for a written response from the DNR.

### Background

In 1997, chlorinated volatile organic compounds (CVOCs) contamination was detected in several residential private water supply wells to the southeast of the Lime Kiln Park Landfill. In May of 1997, the DNR directed the Village of Grafton to hire a consultant to investigate the former landfill as the likely source of the contamination found in the wells, and at that time, many of the private water supply wells were connected to municipal water under a US EPA order. In 1998, the Village's consultant began extensive groundwater investigations to delineate the extent and degree of contamination that came from the landfill, and in the process, also identified an additional groundwater contaminant plume (the West Plume) from a different source. In 1999 the Village received a grant from the DNR to cover investigation costs, and the Village signed an agreement to take responsibility for the West Plume, as well as the Lime Kiln Park landfill contamination.

In a letter dated September 9, 2011, the Department of Natural Resources (DNR) sent a letter reminding the Village of Grafton to assess the vapor intrusion pathway in relation to the contamination at the sites referenced above. In 2018, based on an informal DNR review of the 2017 groundwater monitoring and site investigation report for the West Plume, the DNR notified your consultant, in an email dated July 24, 2018, that a vapor intrusion analysis was needed, and again reminded you and your consultant of that requirement in an on-site meeting on October 17, 2018, and again on May 1, 2019 in a letter. In a meeting on May 27, 2020, the DNR and your consultant, TRC, agreed on a basic approach to conduct the vapor intrusion screening investigation by sampling shallow groundwater near the homes on Green Bay Avenue, and Manchester Drive.

### Proposed Work Summary

TRC proposes to sample shallow groundwater within five feet of the water table surface from four Geoprobe temporary wells using a Screen Point 16 sampler. The results of this groundwater investigation will be evaluated to determine if additional groundwater sampling and/or vapor intrusion sampling is necessary. Two temporary wells will be advanced on Green Bay Avenue, and two temporary wells will be advanced on Manchester Drive, in proximity to residential homes. TRC will evaluate the data and make recommendations for next steps.

Review

The DNR reviewed the above listed documents on August 11, 2020 and found the site investigation work plan to be in substantial compliance with Wis. Admin. ch. NR 716 and is therefore approved. Figures and data of known contamination were not provided in the work plan, so the DNR referenced figures and data from the 2017 site investigation report and the 2019 site investigation report addendum, both from AECOM. Please note that additional work will likely be needed if chlorinated solvents are detected in the shallow groundwater above Wis. Admin. ch. NR 140 standards.

Wis. Admin. Code ch. NR 141 Exemption

The work plan requests DNR approval to install four temporary monitoring wells. In accordance with Wis. Admin Code § NR 141.29, the DNR approves the request to install and sample four temporary monitoring wells as detailed in the work plan.

If you have any questions or concerns regarding this letter, please contact me, the DNR Project Manager, at (262) 416-8643, or by email at [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,



John Feeney, PG  
Remediation & Redevelopment Program  
Wisconsin Department of Natural Resources

Cc: Ms. Marita Stollenwerk, TRC  
Mr. David Buser, DNR WMM Program