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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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December 18, 2001

Ray Roder (Representative for the Ripon FF/NN landfill Potentially Responsible Party (PRP) Group)
Reinhart, Boerner, Van Dueren, Norris, and Rieselbach
22 E Mifflin Street, Suite 600
Madison, WI 53701

Subject: Interim measures at Ripon City Landfill, HWY FF/NN, Ripon, WI
BRRTS # 02-20-000915

Dear Mr. Roder:

The results of recent private well testing indicates that conditions have changed significantly at the Ripon City Landfill at HWY FF and NN. These changes warrant immediate action as they involve chemical exposures above levels of health concern. This letter identifies a number of actions expected from the Ripon FF/NN PRP group. Although no formal letter has been previously sent, the PRP group and their consultant, has begun working towards some of these actions, and that is appreciated. Because of the complexity of this problem additional discussion is appropriate. To that end, a meeting is proposed at the end of this letter.

Annual private well samples were collected on October 9th, 2001 as scheduled. Results from one private well (Ron Altnau) showed an enforcement standard exceedance for vinyl chloride. Additional samples were collected the following week by both WDNR and the PRP groups consultant. In addition a new home (Allen Ehster is owner) was built this spring with a private well on Charles Street. This well has never been sampled for VOCs and WDNR sampled the private well on November 6th, 2001. Both samples (Altnau and Ehster) collected by WDNR came back with vinyl chloride detected. In fact, the vinyl chloride level in the Ehster well was elevated enough that a flush only advisory (dated November 19th, 2001) was issued by the Department of Health and Family Services (DHFS). WDNR issued a drinking water advisory (dated November 15th, 2001) to the Altnau family based on the level of vinyl chloride detected.

Drinking water advisories are issued when chemical contaminants are found in private wells above the groundwater enforcement standard (0.2 ug/L for vinyl chloride). A DHFS "flush only" advisory is issued when contaminant levels are high enough that exposure through other uses of the water (showering, dish washing, etc.) pose a significantly elevated risk (1.8 ug/L for vinyl chloride). Although the level of vinyl chloride in the Altnau well is not above the flush only advisory level, bottled water does not sufficiently address concerns about long-term non-drinking water related exposures. For this reason a whole house drinking water solution should also be sought for the Altnau residence. This action is less time critical than if a more stringent advisory had been issued. DHFS recommends that action be taken to reduce non-drinking water related exposures to vinyl chloride above the enforcement standard if a whole house solution cannot be established within six months. WDNR supports this recommendation and would expect the PRP group to move forward with this action.



Thus far both Ehster and Altnau have been supplied with bottled water and a treatment system is being investigated for the Ehster well. Additional water quality samples were collected in order to ensure effective installation of the treatment system. Those results have been forwarded to the PRP groups consultant, and I have been informed that they are moving forward with submitting the treatment system application to the WDNR. The WDNR is expecting that the system be installed in the Ehster residence as soon as possible. If this action is not taken, the Department will install the system and cost recover from the PRP group. In addition, the WDNR currently views the treatment system(s) as a temporary solution for this emergency situation. Once the degree and extent of the plume is defined and we have a better understanding of what is occurring, a more permanent solution should be proposed.

As an interim measure, sampling of the private wells (Altnau, Ehster, Weiss, Miller, Rohde, Hadel, Gaastra, and Baneck) should be increased to quarterly for VOCs, metals (arsenic, barium, cadmium, copper, chromium, iron, lead, manganese, selenium, silver, zinc), NR 507 indicator parameters (alkalinity, chloride, COD, field conductivity, field pH, field temperature, and hardness) color and odor. The metals sampling may be a two time event to acquire some baseline information. The old Bosveld well had some high levels of chromium and zinc and I would like to determine if these levels are also seen in the private wells. This quarterly monitoring will be necessary to help in determining seasonal fluctuations. After we understand the fluctuations, we may be able to decrease the frequency of sampling with DNR approval.

Additional private wells outside of the ones mentioned above, will need to be sampled. We are currently unable to determine the extent to which the plume has traveled away from the landfill. There are potentially more private wells at risk. The PRP group needs to identify these at risk wells as soon as possible.

Additional work will be required in order to protect human health, determine the degree and extent of contamination and select a remediation plan. The PRP groups consultant should prepare a workplan to address these issues. Because we need to understand why the private wells are just now being impacted, we are requiring that the existing monitoring wells be sampled on a quarterly basis for VOCs, metals (arsenic, cadmium, iron, manganese), and NR 507 indicator parameters. It is possible that past remediation efforts may not be effective and additional remediation measures need to be put into place. The PRP groups consultant should submit a workplan for this additional investigation. Once again, this increased sampling may be for an interim period until we can better understand what is happening.

I would like to suggest having a meeting soon in Ripon to discuss this situation and to jointly visit the site. I think it would be beneficial to all parties involved. With the holidays approaching, I suggest an early January meeting date. Due to the understandable concern among the neighbors, I plan on having a meeting in late January to talk with the residents in the area. I would welcome your presence and participation in that meeting. I will know more in early January of the meeting date.

In addition, it is my understanding that as you are the representative of the Ripon FF/NN landfill PRP group, you are forwarding this correspondence to all the PRPs. If this is not the situation, please send me an updated address listing of the PRPs and I will send this and all future correspondence to them individually.

Thank you for your cooperation. If you have any questions, feel free to call me at 920-303-5447.
Please use the BRRTS # on all correspondence to the WDNR.

Sincerely,



Jennie Pelczar
Remediation and Redevelopment Program

cc: NER Oshkosh File
 Gerry DeMers - Geotrans Inc.
 Bernard Schorle - EPA
 Liz Heinen - WDNR Mishicot
 Carol Schmidt - WDNR Oshkosh
 Mark Gordon - WDNR RR/3
 Chuck Warzecha - DHFS