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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor Darrell Bazzell, Secretary Ron Kazmierczak, Regional Director Oshkosh Service Center 625 East County Road Y, Suite 700 Oshkosh, WI. 54901-9731 Telephone 920-424-3050 FAX 920-424-4404

April 25, 2002

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: Comments on Status update for the Ripon City Landfill,

HWY FF/NN, Ripon, WI BRRTS # 02-20-000915

Dear Mr. Roder:

The Department has received the status update dated March 21, 2002 from GeoTrans. The Department has some concerns on the following items and requests your action as follows:

- 1. The 8 routine monitoring wells(MW-101, MW-103, MW-104, P-106, MW-107, P-107, P107D and MW-112) in addition to MW-111, P-111 and P-111D are to be sampled for VOC's. In addition, NR 507.19 (3) indicator parameters should also be sampled as they are required by code and they provide baseline information to compare with private well data. These indicator parameters will aid in determining the potential for other private wells downgradient being impacted. This analysis should be added to the analyte list from now on.
- 2. Leachate wells should once again be added to the list for sampling and continue to be sampled when the monitoring wells are sampled. If the leachate wells are dry, an attempt should be made to come back when they contain leachate and be sampled at that time.
- 3. The 8 private wells that are normally sampled should be sampled for at least 1 year on a quarterly basis. Due to the recent impacts, these wells need to be monitored closely. The Department does not feel comfortable going back to an annual sampling program until we have a full year of data from these wells that may reflect seasonal variations. After 4 quarters the Department can review a recommendation for a modified sampling schedule. In addition the NR507.19(3), indicator parameters should also be sampled every time the private wells are sampled for the above stated reasons.
- 4. Several selected private wells downgradient (further downgradient from the 8 routine private wells) should be sampled for indicator parameters. Several of the private wells have shown elevated chloride levels which are indicative of the front of a plume and it is these wells that should be sampled. Since we do not know the extent of the plume the Department is asking for this data until we have the plume defined.
- 5. Please submit an updated comprehensive groundwater elevation table every time groundwater at the landfill is sampled.

The Department understands that the next round of groundwater sampling and gas sampling is to be completed in May of 2002 and we hope that the above concerns will be addressed. The Department is looking forward to the next workplan for the site investigation to define the degree and extent of the contaminant plume. After the plume is defined a remedial action plan should be submitted.



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

Jerry DeMers - Geotrans Inc.

Bernard Schorle - EPA

Liz Heinen - WDNR Mishicot Chuck Warzecha - DHFS