State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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March 13, 2003

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 of Feasibility Study Workplan (FSWP) for Ripon City Landfill, HWY FF/NN, Ripon, WI **BRRTS # 02-20-000915**

Dear Mr. Roder:

The Department has received the GeoTrans report titled "Work Plan For Focused Feasibility Study Sandstone Aquifer" dated January 8, 2003 to evaluate remedial options at the Ripon FF/NN landfill. The goal of this workplan is to determine what remedy will stop the migration of the expanding plume in all aquifers and better treat the source area to regain and maintain compliance with **ch.** NR140**, Wis. Adm. Code** groundwater standards.

The following items are both the Departments and EPAs response to the FSWP:

1. Please note that the PRPs response objectives under NR140.24 (2) is to "prevent any new releases of the substance from traveling beyond the design management zone (DMZ)…". This is anNR140 requirement and should be obtained with the remedial alternative.

2. This GeoTrans report states that the objective of this focused FSWP is to address the vinyl chloride impacted groundwater in the "sandstone aquifer" to meet the NR140 groundwater standards. The Department does not agree that the FSWP only address the sandstone aquifer. This FSWP should cover all impacted aquifers, not just the sandstone aquifer.

3. The ARARs in the February 26, 1996 ROD are no longer frozen as of the date of the ROD. It is necessary to consider other ARARs that need to be observed. This focused feasibility should not focus on only one state requirement…groundwater. The Department agrees that the groundwater impacts to the private wells is the main issue, however other ARARs are applicable and should not be overlooked.

4. Within the FSWP, GeoTrans references the 1988 EPA guidance on RI/FS at CERCA sites. Please consider also referencing "Conducting Remedial Investigation/Feasibility Studies for CERCLA Municipal Landfill Sites" (EPA, 1991). This is the most up to date EPA reference for landfills.

5. Currently, the landfill cap has not adequately controlled the migration of the groundwater plume and has not improved the groundwater quality. The plume has expanded to the residential area on Charles Street. Vinyl chloride was detected in two private wells in October of 2001. These private wells have been monitored for many years. The detection of VOCs in these downgradient wells proves that the groundwater plume from the landfill has in fact expanded downgradient. In addition, landfill gas has been detected outside the waste mass above the lower explosion limit (LEL) over the years

since the cap was installed. Monitoring landfill gas in monitoring wells is not acceptable under NR500. Proper landfill gas probes should be installed. Please submit a plan to address this issue with the feasibility study report.

6. The Department has talked with Jerry DeMers at GeoTrans preliminarily about the workplan. The Department does not have a problem with the technologies that were suggested. However, several of the technologies will not stop the plume from expanding. Options 3.1, 3.2, 3.3, and 3.4 will not stop the plume. Therefore, the Department does not consider these options as a final remedy but may be implemented with a combination of the other viable options.

7. The Department has suggested another option be considered; this option is vapor extraction at the landfill (the source). It is common knowledge within the Department's waste program that vapor extraction aids in the reduction of VOCs within the groundwater, by removing them before they become part of the groundwater problem. One thing to keep in mind when putting this FS together is that the goal of the FS is to implement a remedial action that will stop the groundwater plume from expanding.

8. Additional monitoring wells have been installed to aid in determining the degree and extent downgradient. However, the groundwater contaminant plume has not been defined to date. Therefore, you will need to determine that there is no dense non-aqueous phase liquid (DNAPL).

9. Please provide current hydraulic gradients for each of the aquifers.

10. Current data shows that the groundwater quality in MW-112 has changed significantly. The water in this well was black in color and the vinyl chloride levels have increased significantly. With this noted, the Department is requesting that additional investigation of the downgradient wetland area be investigated.

11. The 1996 ROD has two operable units 1) Source control and 2) Groundwater monitoring plan. Operable unit 1 (OU-1) is not working and OU-2 needs to be modified through a NR500 Plan Modification. Greg Tilkens from the waste program at Department will be assisting in this plan modification and his hours for this involvement will be billed back to the PRP group. The 1996 ROD will be amended once a RA is determined for the site.

Please address the above issues in the next report to be submitted to the department.

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
Bruce Urben – NER GB
Joe Renville – LS/5