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**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES**

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**Matthew J. Frank, Secretary**  
**Ron Kazmierczak, Regional Director**

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October 21, 2009

Nelson Olavarria (Representative for the Ripon FF/NN Landfill Potentially Responsible Party (PRP) Group)  
Cooper Industries  
600 Travis Street, #5600  
Houston, TX. 77210

**SUBJECT: Evaluation of Feasibility Study (FS) and Monitored Natural Attenuation  
Monitoring Plan for the Ripon HWY FF/NN Landfill,  
License #467, Ripon, WI.  
WDNR BRRTS #02-20-000915**

Dear Mr. Olavarria:

The Department and the EPA have determined that in order to allow the PRP Group to evaluate monitored natural attenuation (MNA) as a potential remedy for the groundwater at the Ripon FF/NN Landfill, additional time is needed to collect and evaluate the data which would support this remedy. Therefore the Record of Decision Amendment will be postponed until July of 2011. An updated feasibility report should be submitted around January 2011 with updated costs and associated information.

The Department received a workplan for a monitored natural attenuation (MNA) analysis on August 12, 2009. Within this workplan, a new MNA sampling schedule was suggested with additional MNA parameters. Semi-annual sampling was suggested for the MNA monitoring. The Department does not agree that semi-annual sampling will be sufficient for a determination that MNA is working at the site in the limited timeframe available. Quarterly sampling is recommended for this timeframe until the end of 2010 when MNA will be re-evaluated as a possible remedy for the downgradient plume. A reduction in groundwater parameters can be discussed after evaluating the data at that time.

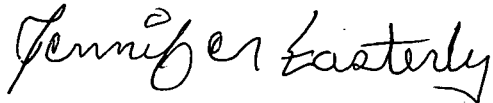
The following are items that can be conditionally approved if the following modifications are made:

1. Private well sampling should stay at quarterly VOC sampling.
2. Quarterly MNA/VOC sampling at selected MNA wells.
3. Water level monitoring should also stay at quarterly. As a side note, municipal well #9 will be turned back on in a few weeks at the latest and groundwater flow may once again change in the deeper aquifer due to this draw on the groundwater aquifer.
4. Change the semi-annual gas VOC sampling to quarterly in the gas wells/vents and gas probe.
5. NA Parameters – change sulfide to sulfate, and switch nitrite to nitrate. Add Baneck, Gaastra and Rhode private wells for MNA analysis.

Although the Department is conditionally approving this MNA workplan, if the evidence from these samplings do not support that MNA is occurring, the PRP Group will need to look at other active alternatives to deal with the groundwater plume. We strongly recommend that the PRP Group continue evaluating other options for the groundwater plume.

The Department appreciates your efforts to restore the environment at this site. Should you have any questions regarding this letter, please call me at (920) 303-5447 or email me at [jennifer.easterly@wisconsin.gov](mailto:jennifer.easterly@wisconsin.gov). Thank you for your cooperation.

Sincerely,



Jennifer Easterly  
Hydrogeologist  
Remediation & Redevelopment Program

cc: NER Oshkosh File  
Bernard Schorle, EPA – ecopy - [schorle.bernard@epa.gov](mailto:schorle.bernard@epa.gov)  
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