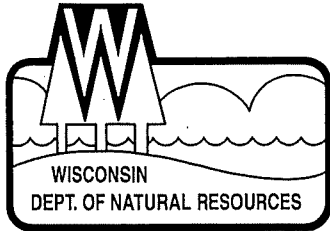


*File*



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

Jim Doyle, Governor  
Matthew J. Frank, Secretary

101 S. Webster St.  
Box 7921  
Madison, Wisconsin 53707-7921  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711

October 20, 2010

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

**SUBJECT:** Groundwater and Monitored Natural Attenuation (MNA) Monitoring Plan  
Schedule Modifications and Other Requests  
Ripon HWY FF/NN Landfill  
License #467, Ripon, WI.  
**WDNR BRRTS #02-20-000915**

Dear Mr. Olavarria:

The Department and the USEPA have reviewed a letter and attachment submitted for you by Michael Noel of GeoTrans dated September 2, 2010, requesting changes to the groundwater and NA monitoring plan for the above referenced site.

Monitoring Schedule and Parameters

We feel the VOC monitoring should continue quarterly for a few more rounds until we feel we have enough data to determine if there are seasonal variations and we know the results are fairly stable over time. Once we have a good data set over time, we are hoping there will be enough data to justify a Record of Decision (ROD) amendment to change the groundwater remedy to MNA with a contingency.

Based on the monitoring done so far, it appears that the VOC monitoring and certain field parameters are the most important lines of evidence at this site for possible NA contaminant reduction. The field parameters of nitrate and sulfate and lab parameter of dissolved methane are less important.

Therefore, we are not approving any change to the monitoring program schedule or parameters conditionally approved by our letter of October 21, 2009, except you may discontinue sampling for nitrate, sulfate and dissolved methane.

Request for Passive Diffusion Bag (PDB) Method Sampling

PDB sampling hasn't been done before at this site. It's important that sampling methods be as consistent as possible over the consecutive rounds so the results can be compared fairly. We may be willing to consider allowing PDB sampling instead of current methods provided you sample the wells it is proposed for with both methods at the same time and it can be shown the results are consistent.



### Skipped Sampling Round and Written Approvals

We learned after your request was submitted that the originally required August 2010 quarterly sampling event was not conducted due to an apparent misunderstanding on your part of what the monitoring program requirements were. We understand you have continued with the required quarterly monitoring this month.

Our letter of October 21, 2009 conditionally approved the current monitoring program. There were subsequent email messages from Jennie Easterly related to the monitoring, but they didn't generally modify the overall quarterly sampling schedule and allow skipping of the August sampling round while the program was under review. Jennie did agree to some VOC monitoring location changes in an email dated January 22, 2010, attached, but those changes only applied to the January, 2010 sampling round. That email didn't allow skipping of subsequent rounds. It probably would have been best if you had asked if you could skip subsequent rounds while the program is under review.

There are many areas of more minor day-to-day communication that we can handle by phone or email. Where necessary, minor changes agreed to by phone or email that need to be documented can be saved and summarized in subsequent written communications that are placed in the case file and kept for the record. The specified monitoring program schedule at the site isn't a minor item that can be changed without a formal written approval.

### Request for a Draft Institutional Control (IC) Plan

We had previously requested by email that you submit a draft IC Plan by November 30, 2010 to us and USEPA. This formalizes that request. Please submit a draft IC Plan by that date.

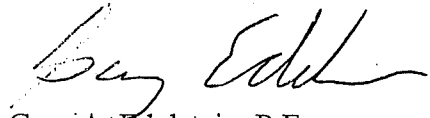
### Schedule for the Feasibility Study (FS) and ROD Amendment

Our October 21, 2009 letter indicated that we planned to schedule the ROD Amendment for July of 2011 and stated an updated FS should be submitted around January 2011 with updated costs and associated information.

Due to the State Project Manager change and resource constraints, we now believe this schedule is unrealistic. At this point it appears the ROD Amendment will not occur until later in 2011. Therefore, it is now acceptable to submit the revised FS before July 31, 2011. However, to ensure the FS is complete by then, we encourage you to submit a draft FS for review and comment only (not for formal approval/denial) before that date, preferably before March 31, 2011.

The Department appreciates your efforts to restore the environment at this site. Should you have any questions regarding this letter, please call me at (608)267-7563 or email me at gary.edelstein@wisconsin.gov. Thank you for your cooperation.

Sincerely,



Gary A. Edelstein, P.E.  
Waste Management Engineer  
Remediation & Redevelopment Program

Attach.

cc: NER Oshkosh File  
Bernard Schorle, EPA – ecopy - [schorle.bernard@epa.gov](mailto:schorle.bernard@epa.gov)  
Mike Noel, GeoTrans – ecopy – [mnoel@geotransinc.com](mailto:mnoel@geotransinc.com)  
Steve Barg, City of Ripon – ecopy – [sbarg@cityofripon.com](mailto:sbarg@cityofripon.com)

**From:** Easterly, Jennifer S - DNR [Jennifer.Easterly@Wisconsin.gov]  
**Sent:** Friday, January 22, 2010 4:00 PM  
**To:** Noel, Mike  
**Cc:** Olavarria, Nelson; Steve Barg; Lincicum, Kevin; Schorle.Bernard@epamail.epa.gov  
**Subject:** RE: FF/NN Landfill Progress Report

Mike,

I can agree to most of your proposed plan for the VOC groundwater monitoring changes for the January 2010 sample event with the following exceptions: I would like to see you keep MW-103, P-103, P-103D and P-116 for VOC groundwater sampling. Then go back to 1/4ly for the April 2010 event for all MNA wells. We can re-evaluate the August sampling event after we have this data. I'm under the assumption that MNA parameters, water levels and gas sampling shall remain at quarterly, as approved in my October 21, 2009 letter (as you only requested a reduction in VOC monitoring).

Please keep in mind that this data is to be used to provide information that MNA is working and you only have this year to collect the data before we go to the ROD amendment. If we do not have enough data to support MNA, it will not be selected as the remedy. It may seem like a big expense now...but compare it to the other remedial alternatives and their costs; the current monitoring costs, I'm sure, will seem less expensive.

One other item to note...I see in the private well notification letters sent to the homeowners from the City, chloromethane was once again detected. Has the lab provided any explanation for this compound? Can you ask the homeowners if they have recently chlorinated their wells, and when? Was there something wrong with the preservatives or were the samples shipped with other samples? Was there any change in the samplers method of sampling? Can you provide the COC form? I would recommend that a separate trip blank go with these 3 samples from now on and be analyzed for EPA method 524.2.

Call me if you have further questions.

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**From:** Noel, Mike [mailto:Mike.Noel@geotransinc.com]  
**Sent:** Tuesday, January 19, 2010 3:27 PM  
**To:** Easterly, Jennifer S - DNR  
**Subject:** FW: FF/NN Landfill Progress Report

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**From:** Noel, Mike  
**Sent:** Tuesday, January 19, 2010 2:59 PM  
**To:** Easterly, Jennifer S - DNR  
**Cc:** Olavarria, Nelson; Steve Barg; Lincicum, Kevin  
**Subject:** FF/NN Landfill Progress Report

Jennie,

Attached is the semiannual progress report for the 2<sup>nd</sup> half of 2009 for the FF/NN Landfill. A hard copy will be sent via mail. The results show continued vinyl chloride reductions in the groundwater. Based on these results it is proposed that the three private wells and only the monitoring wells with detectable vinyl chloride (4 wells) will be sampled during the next two quarterly events. The next quarterly event is planned for the last week in January 2010.

Mike