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1-20-2011

January 20, 2011

Mr. Barry VandeBrink
Town Board Chairman
Town of Ripon
W13964 Oak Haven Drive
Ripon, WI 54971-9280

RE: Institutional Control Plan
Ripon FF/NN Landfill (Ripon City Landfill) National Priorities List (NPL) Site

Dear Mr. VandeBrink,

The US Environmental Protection Agency (EPA) and Wisconsin Department of Natural Resources (WDNR) have requested that an Institutional Control Plan (ICP) be prepared for the FF/NN Landfill. The FF/NN Landfill PRP Group (Cooper Industries, City of Ripon, Town of Ripon and others) has contracted GeoTrans, Inc. to prepare the ICP. The purpose of the ICP is to provide a comprehensive approach to limiting human exposure to contaminants from the FF/NN Landfill NPL Site through implementation and monitoring of institutional controls until the principal threat has been eliminated.

Institutional controls in place for the Site include, but are not limited to:

- Forbidding construction of a potable or non-potable well within 1200 feet of the Site
- A well advisory area that specifies potable wells must be constructed or reconstructed to more stringent standards within certain areas around the Site.

The attached figure outlines these areas.

One of the mechanisms we are proposing to monitor compliance with these controls is to have the Town of Ripon notify the FF/NN Landfill PRP Group of the following items if feasible:

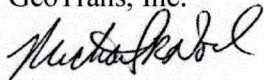
- Vicinity Building Permits: Section 13.2 of Article XIII of the Town of Ripon zoning ordinance requires a permit for any building, structure or mobile home. We would request that the Town Board notify the PRP Group on an on-going basis if the board receives an application for a building permit for any parcel within the south ½ of Section 7 or the north ½ of Section 18 T16N, R14E (see attached map). This is a backup control measure to make sure the permit requester is aware of the well casing advisory and setback requirements.
- Vicinity Special Use Permits: Sections 6.4 and 11.2 of the Town of Ripon zoning ordinance require a permit when requesting a use not permitted by an Ordinance in a Zoning District. We would request that the Town Board notify the PRP Group on an on-going basis if the board receives an application for a special use permit for any parcel within Sections 7, 8, 17 or 18 T16N, R14E (see attached map) that involves surface water or groundwater dewatering activities such as

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mineral extraction operations. This is a control that provides a mechanism for the PRP Group to evaluate the location and proposed activities and provide public comments, if necessary, during the public notice period. An example of this occurred in June, 2009 when the WDNR and Ripon FF/NN Landfill RPs were alerted by the Town Board and were able to submit comments to the Town Board regarding a special use permit application submitted for a sand and gravel pit operation on the Roger Washkovic property located southeast of the landfill.

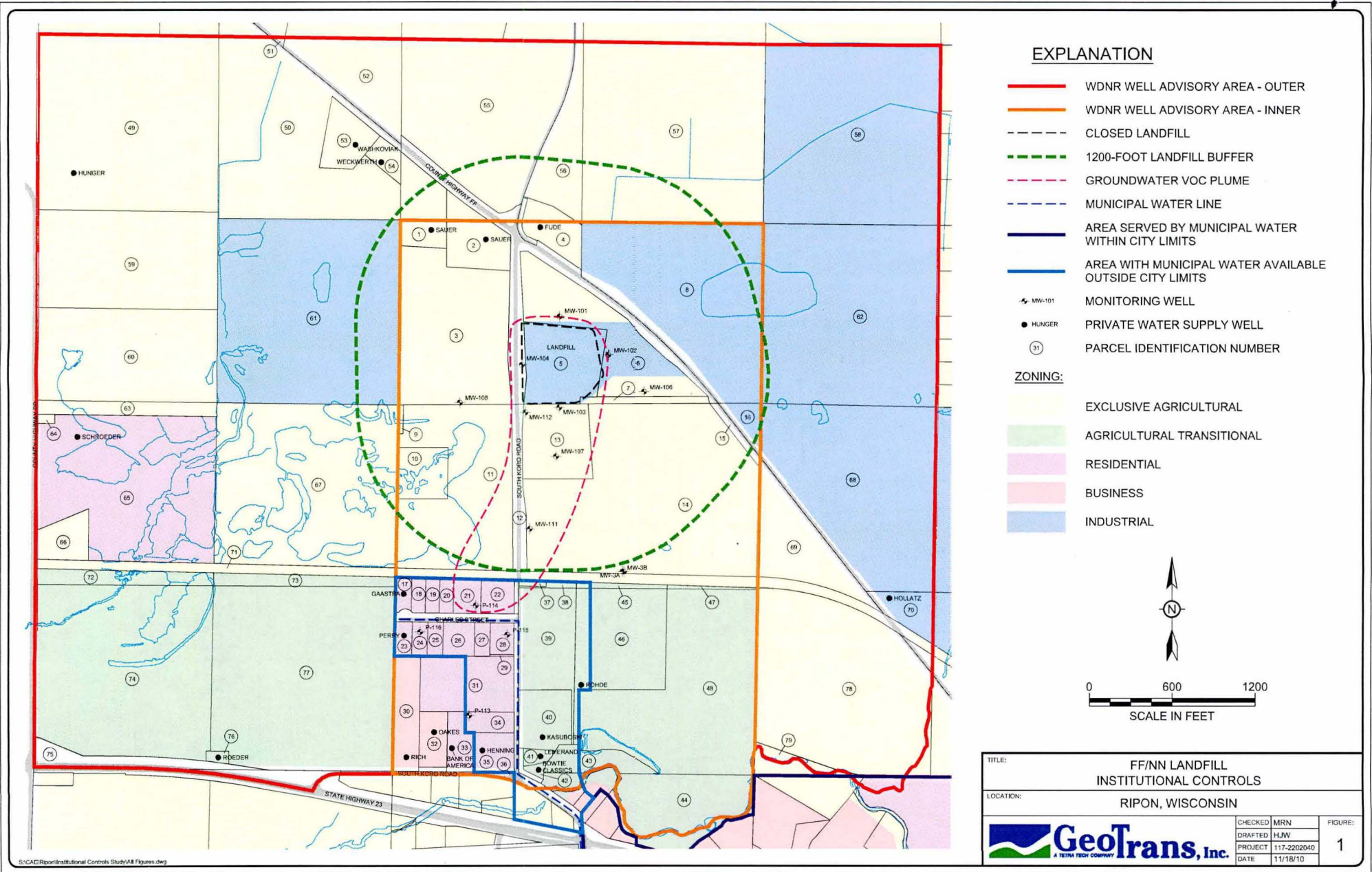
Please let me know whether or not the Town is willing to provide these notifications to the FF/NN Landfill PRP Group.

Sincerely,
GeoTrans, Inc.



Michael R. Noel, P.G.
Vice President, Principal Hydrogeologist

cc: Nelson Olavarria, Cooper Industries
Lori Rich, Interim City Administrator, City of Ripon

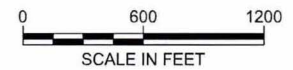
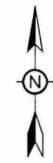


EXPLANATION

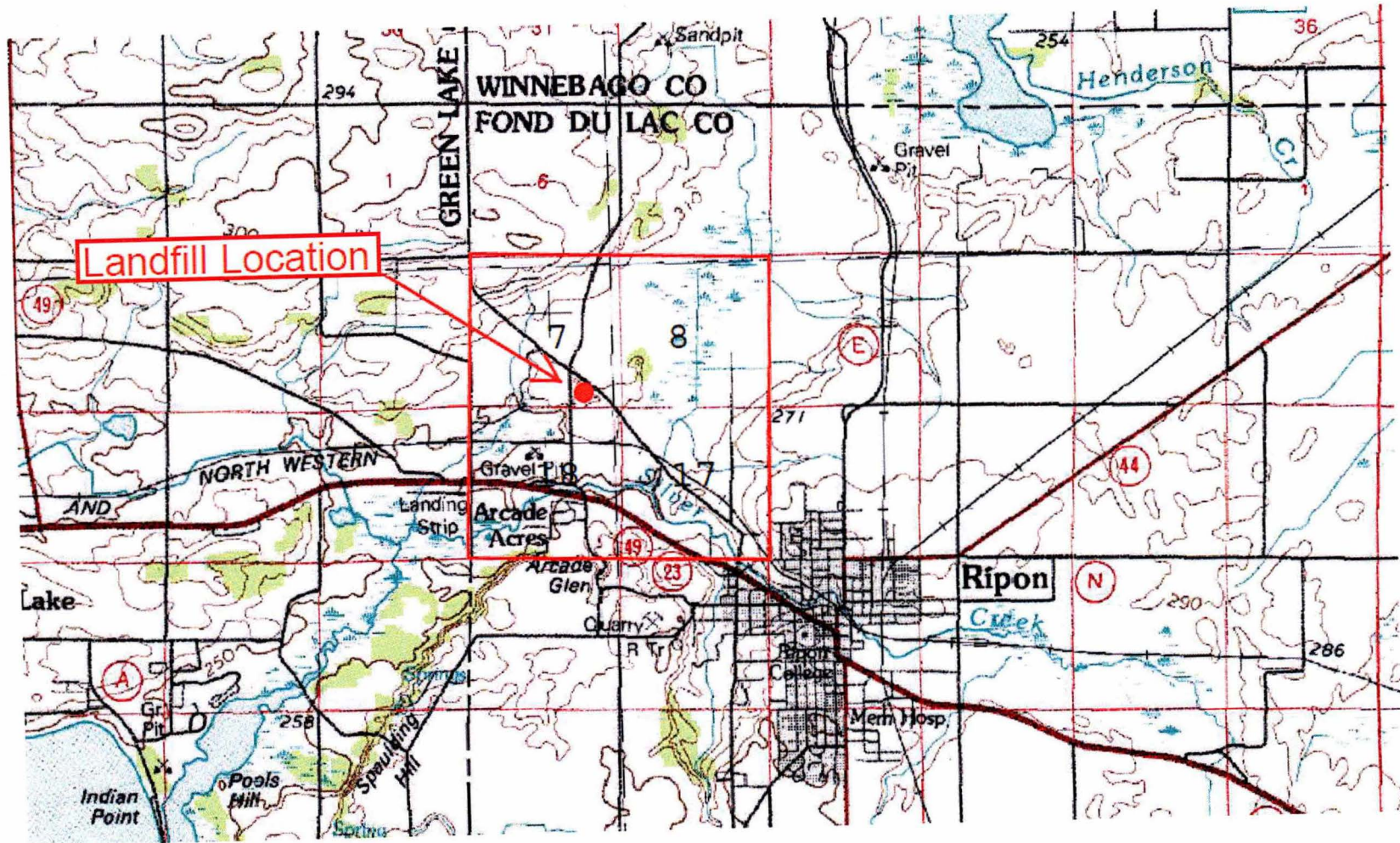
- WDNR WELL ADVISORY AREA - OUTER
- WDNR WELL ADVISORY AREA - INNER
- - - - - CLOSED LANDFILL
- - - - - 1200-FOOT LANDFILL BUFFER
- - - - - GROUNDWATER VOC PLUME
- - - - - MUNICIPAL WATER LINE
- AREA SERVED BY MUNICIPAL WATER WITHIN CITY LIMITS
- AREA WITH MUNICIPAL WATER AVAILABLE OUTSIDE CITY LIMITS
- MW-101 MONITORING WELL
- HUNGER PRIVATE WATER SUPPLY WELL
- 31 PARCEL IDENTIFICATION NUMBER

ZONING:

- EXCLUSIVE AGRICULTURAL
- AGRICULTURAL TRANSITIONAL
- RESIDENTIAL
- BUSINESS
- INDUSTRIAL



TITLE:		FF/NN LANDFILL INSTITUTIONAL CONTROLS	
LOCATION:		RIPON, WISCONSIN	
	CHECKED	MRN	FIGURE: 1
	DRAFTED	HJW	
	PROJECT	117-2202040	
	DATE	11/18/10	



Sections 7, 8, 17 and 18