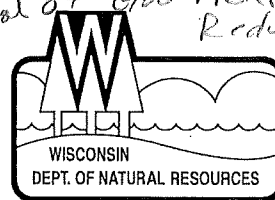


State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
101 S. Webster Street  
Box 7921  
Madison WI 53707-7921

*A.C. 99 - Approval of GW Mon. Reduction*

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711



December 2, 2013

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

SUBJECT: Conditional Approval of Revised Reporting Requirements for the Ripon HWY FF/NN  
Landfill  
Ripon HWY FF/NN Landfill  
License #467, Ripon, WI  
**WDNR BRRTS #02-20-000915**

Dear Mr. Olavarria:

The Department and US EPA have completed the review of your request for revisions to the approved quarterly reporting requirements, prepared for you by Tetra Tech Inc., received on October 28, 2013. The Department is approving the revisions subject to the following conditions.

1. The following addition will be made to all quarterly reports:  
Section 3.4 LF Cap Inspection
2. [Optional condition] The following addition is recommended to be added to all quarterly reports:  
Section 3.3 Private Well Sampling
3. Groundwater monitoring well VOC charts:  
Provide charts quarterly for all wells where the enforcement standard (ES) for trichloroethene, cis-1,2-dichloroethene, or vinyl chloride is exceeded until all levels fall below the ES for those compounds for at least a year. If they fall below the ES for those compounds for at least a year, but then exceed the ES in a subsequent round, then the charts would be provided again until they fall below the ES for those compounds for at least a year.

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](mailto:gary.edelstein@wisconsin.gov). Thank you for your cooperation.

Sincerely,

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

## Edelstein, Gary A - DNR

---

**From:** Edelstein, Gary A - DNR  
**Sent:** Monday, December 02, 2013 11:13 AM  
**To:** 'Noel, Mike'; Olavarria, Nelson (Nelson.Olavarria@CooperIndustries.com); Lori Rich (lrich@cityofripon.com)  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval  
**Attachments:** Revised\_Reporting\_Approval.pdf

Mike, attached is the formal approval. I've dropped the hard copy in the mail to Nelson.

As we agreed, no changes to the 10/7 Quarterly Report are required. The revised reporting requirements apply to the next report.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

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---

**From:** Noel, Mike [mailto:Mike.Noel@tetrattech.com]  
**Sent:** Tuesday, November 26, 2013 11:26 AM  
**To:** Edelstein, Gary A - DNR; Olavarria, Nelson (Nelson.Olavarria@CooperIndustries.com); Lori Rich (lrich@cityofripon.com)  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Gary,  
We're OK with your last email. Are you going to formalize this in a letter? Also, the only change to the 10/28/13 quarterly monitoring report would be adding in a one sentence statement about the cap inspection. I'm not sure it makes sense to reissue the report for that. If you want we can send a changed page addendum, or just pick it up in the next report which would be our preference.  
Mike

---

**From:** Edelstein, Gary A - DNR [mailto:Gary.Edelstein@wisconsin.gov]  
**Sent:** Wednesday, November 20, 2013 2:19 PM  
**To:** Noel, Mike; Olavarria, Nelson (Nelson.Olavarria@CooperIndustries.com); Lori Rich (lrich@cityofripon.com)  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Mike,

For the private wells, repeating the information that the wells are only sampled annually is nice, but I guess is not absolutely necessary.

While a full formal inspection of the cover is an annual event, the discussion has been updated every quarter. It seems to me if the cover conditions are generally observed quarterly, then that should be reported. Given the past history of cover issues and the fact that the fence around the site has gaps and is not ideal, I would prefer the quarterly observations and discussion continue.

I'm OK with your well chart discussion.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
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Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

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**From:** Noel, Mike [<mailto:Mike.Noel@tetrattech.com>]  
**Sent:** Friday, November 15, 2013 3:45 PM  
**To:** Edelstein, Gary A - DNR; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Gary,

Thanks for your response to our request. With respect to your proposed changes we have the following questions/comments:

- Additions to all quarterly reports: Private well sampling and cap inspection are only annual events conducted during the April sampling event. If there is nothing to report for the other quarters of the year I'm not sure why we would add those sections to the report. What would we report?
- Groundwater monitoring well VOC charts: There are currently only 4 wells that meet the criteria you suggest and the charts for all 4 of those wells were provided in the last report:
  - P-107D (last ES exceedence was 4/26/13)
  - P-111D (last ES exceedence was 7/2/13)
  - P-114 (last ES exceedence was 4/26/13)
  - P-115 (last ES exceedence was 4/26/13)
  - P-107 was also provided in the report but its last ES exceedance was in 4/4/12 which would not require submittal under your current proposal.

Based on these facts/results I don't believe there is anything to add to the last report or to the next reports until April. Please confirm.

Mike

---

**From:** Edelstein, Gary A - DNR [<mailto:Gary.Edelstein@wisconsin.gov>]  
**Sent:** Wednesday, November 13, 2013 10:16 AM  
**To:** Noel, Mike; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Mike,

We and EPA have reviewed your request. We are willing to accept the proposal with the following additions. If this is acceptable, then please let me know and I'll prepare a formal approval letter and you should add the information to the 10/28/13 quarterly monitoring report and submit those additions for that report to the agencies. Subsequent reports would then follow the new approved changes.

Additions to all quarterly reports:

Section 3.3 Private Well Sampling  
Section 3.4 LF Cap Inspection

Groundwater monitoring well VOC charts:

Provide charts quarterly for all wells where the enforcement standard (ES) for trichloroethene, cis-1,2-dichloroethene, or vinyl chloride is exceeded until all levels fall below the ES for those compounds for at least a year. If they fall below the ES for those compounds for at least a year, but then exceed the ES in a subsequent round, then the charts would be provided again until they fall below the ES for those compounds for at least a year.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

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**From:** Noel, Mike [<mailto:Mike.Noel@tetrattech.com>]  
**Sent:** Monday, October 28, 2013 1:02 PM  
**To:** Edelstein, Gary A - DNR; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Gary,  
Per your request attached is a letter with proposed changes to quarterly reporting requirements.  
Mike

---

**From:** Edelstein, Gary A - DNR [<mailto:Gary.Edelstein@wisconsin.gov>]  
**Sent:** Monday, October 21, 2013 10:38 AM  
**To:** Noel, Mike; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Mike, Lori and Nelson,

I note the July 2013 progress report, which I received as hard copy on 10/11/13 and electronic on 10/7/13, has a number of elements that were not included in either the printed or the electronic versions submitted as compared to previous submittals.

While we discussed options for reducing submittal elements after the email below was sent, there was no agreement during that discussion. Such a reduction must be formally approved in writing, as I indicated below. To my knowledge,

there was no agreement on what would be submitted, other than what I outlined below in our last offer, which would have to be approved in writing, if we agreed.

Please submit the rest of the information, or as an alternative, contact me immediately so we can discuss this further.

Thank you for your attention to this.

Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
P.O. Box 7921  
Madison, WI 53707  
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Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

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---

**From:** Edelstein, Gary A - DNR  
**Sent:** Friday, August 02, 2013 11:25 AM  
**To:** 'Noel, Mike'; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR  
**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Mike, Lori and Nelson,

Bernie, Kevin and I have discussed your request to reduce the formal report submittal (with charts and maps) to annual and submit the data quarterly only to our GEMS system. At this point, we believe it is important for the agencies to receive the report results discussion, data results, maps and plots quarterly. Our GEMS system will not substitute for the submittal of that information.

At other Superfund sites we have agreed to allow certain portions of this sort of submittal to be submitted electronically via email and on optical disc for the file in lieu of printing all the information. It appears to me that all the data tables and attachments A through D could be submitted that way, given that it will be prepared anyway. Printed versions of the rest of the information would still be submitted to me, Bernie and Kevin. Kevin would get the optical disc for the file.

If this is acceptable to you, then please let me know and I will prepare a formal response. If you would prefer to discuss it further, please let me know.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

---

**From:** Noel, Mike [<mailto:Mike.Noel@tetrattech.com>]  
**Sent:** Wednesday, July 24, 2013 9:08 AM  
**To:** Edelstein, Gary A - DNR  
**Cc:** Schorle, Bernard; McKnight, Kevin - DNR; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich

([Irich@cityofripon.com](mailto:Irich@cityofripon.com))

**Subject:** RE: Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Gary,  
Attached is the quarterly status report for the April sampling event. A hard copy is also being sent. The cover letter from the City of Ripon also presents a request for revised reporting. Let me know if you have any questions.  
Mike

---

**From:** Edelstein, Gary A - DNR [<mailto:Gary.Edelstein@Wisconsin.gov>]

**Sent:** Thursday, April 18, 2013 1:18 PM

**To:** Noel, Mike

**Cc:** Schorle, Bernard; McKnight, Kevin - DNR; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Irich@cityofripon.com](mailto:Irich@cityofripon.com))

**Subject:** Ripon FF/NN Landfill Groundwater Monitoring Revisions Conditional Approval

Mike,

Attached is the signed conditional approval for the revisions to the groundwater monitoring program.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
P.O. Box 7921  
Madison, WI 53707  
(608)267-7563  
Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

---

**From:** Noel, Mike [<mailto:Mike.Noel@tetrattech.com>]

**Sent:** Friday, March 15, 2013 12:04 PM

**To:** Edelstein, Gary A - DNR

**Cc:** Lilek, Christine F - DNR; Lauridsen, Keld B - DNR; Schorle, Bernard; McKnight, Kevin - DNR; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Irich@cityofripon.com](mailto:Irich@cityofripon.com))

**Subject:** RE: Ripon FF/NN Landfill Progress Report

Sorry, attached is the full version.

---

**From:** Edelstein, Gary A - DNR [<mailto:Gary.Edelstein@Wisconsin.gov>]

**Sent:** Friday, March 15, 2013 11:59 AM

**To:** Noel, Mike

**Subject:** RE: Ripon FF/NN Landfill Progress Report

Mike,

I don't see any figures, charts or appendices, just cover pages for them.

Thanks, Gary E

Gary A. Edelstein, P.E., Waste Management Engineer  
Wisconsin Department of Natural Resources  
Bureau for Remediation and Redevelopment - RR/5  
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Madison, WI 53707  
(608)267-7563  
Internet E-Mail => [Gary.Edelstein@wisconsin.gov](mailto:Gary.Edelstein@wisconsin.gov)

**From:** Noel, Mike [<mailto:Mike.Noel@tetrattech.com>]

**Sent:** Friday, March 15, 2013 11:41 AM

**To:** Edelstein, Gary A - DNR

**Cc:** Lilek, Christine F - DNR; Lauridsen, Keld B - DNR; Schorle, Bernard; Olavarria, Nelson ([Nelson.Olavarria@CooperIndustries.com](mailto:Nelson.Olavarria@CooperIndustries.com)); Lori Rich ([Lrich@cityofripon.com](mailto:Lrich@cityofripon.com))

**Subject:** Ripon FF/NN Landfill Progress Report

Gary,

Attached is the FF/NN Landfill progress report for the January 2013 sampling event. A hard copy is also being sent.

Mike

**Michael R. Noel** | Vice President, Principal Hydrogeologist

Office: 262-792-1282 x 223 | Fax: 262-792-1310 | Mobile: 262-853-4983

[mike.noel@tetrattech.com](mailto:mike.noel@tetrattech.com)

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