

August 11, 2021

Mr. B.J. LeRoy  
Wisconsin Department of Natural Resources  
2300 N Martin Luther King Jr Dr  
Milwaukee, WI 53212-3128

Subject: Proposed Groundwater Monitoring Program Modifications  
FF/NN Landfill NPL Site, Ripon, Wisconsin  
BRRTS No. 02-20-000915

Dear Mr. LeRoy:

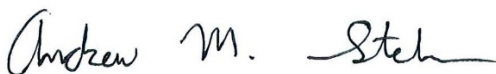
TRC, on behalf of the Potentially Responsible Party (PRP) Group, is proposing changes to the existing Groundwater Monitoring Program (GMP) for the FF/NN Landfill NPL Site. The current GMP follows the plan approved by the Wisconsin Department of Natural Resources (WDNR) in the Conditional Approval of Revised Groundwater Monitoring Program letter dated April 18, 2013 and amended by the Proposed Second Replacement Sentinel Monitoring Well Work Plan Approval letter dated June 8, 2017. The current GMP is summarized in Table 1 and generally calls for quarterly sampling of most wells within the groundwater plume for volatile organic compounds (VOCs) and monitored natural attenuation (MNA) parameters, with semiannual, annual, or no sampling at other site wells. One private water supply well (Rohde) is sampled annually for VOCs. Two other private wells included in the 2013 plan (Baneck/Perry and Gaastra) were later dropped from the monitoring plan after the residences served by these wells were connected to the municipal water supply in 2015.

The current GMP for the site, as summarized in Table 1, includes four quarterly monitoring events. Existing data for the site indicates that changes in contaminant concentrations develop on the time scale of multiple years to decades, with little variation on a quarterly timescale. As a result, continued quarterly monitoring of the site is no longer warranted. TRC proposes to reduce groundwater sampling frequency from four quarterly events to two semiannual events per year. The proposed semiannual monitoring plan, including sampling points, frequencies, and parameters, is summarized in Table 1. The proposed monitoring plan includes annual sampling of natural attenuation parameters to continue to monitor MNA conditions at the site. Wells with chlorinated VOC (CVOC) detections will be sampled semiannually for VOCs to continue to monitor CVOC concentration trends. The proposed sampling frequency for MW-3B and P-113B is reduced to annual because these wells are outside the VOC plume. The proposed parameters and frequency of monitoring will allow for the continued monitoring of plume extents and natural attenuation processes at the site while maintaining timely information of potential plume changes. Site data and sampling results will be submitted to the WDNR in a semiannual monitoring report following each semiannual sampling event.

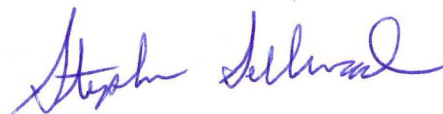
We request WDNR approval of the proposed semiannual GMP. If you have any questions about the proposed plan, please contact Andrew Stehn at 608-807-8112 or Steve Sellwood at 608-347-8594.

Sincerely,

TRC



Andrew M. Stehn, P.E.  
Senior Project Engineer



Stephen Sellwood, P.G.  
Senior Hydrogeologist

Attachment: Table 1 – Current and Proposed Groundwater Monitoring Plan

cc: Jeff Tracy – Geosyntec (electronic)  
Adam Sonntag – City of Ripon (electronic)

**Table 1: Current and Proposed Groundwater Monitoring Plan  
FF/NN Landfill  
Ripon, Wisconsin**

| Well/Point ID                     | Current Monitoring Plan |        |        |        | Proposed Monitoring Plan |    |
|-----------------------------------|-------------------------|--------|--------|--------|--------------------------|----|
|                                   | Q1                      | Q2     | Q3     | Q4     | S1                       | S2 |
| <b>Layer 1 Monitoring Wells</b>   |                         |        |        |        |                          |    |
| MW-101                            |                         | WL     |        |        | WL                       |    |
| MW-102                            |                         | WL     |        |        | WL                       |    |
| MW-103                            |                         | V + NA | V + NA |        | V + NA                   | V  |
| MW-104                            |                         | V      |        |        | V + NA                   |    |
| MW-106                            |                         | WL     |        |        | WL                       |    |
| MW-107                            |                         | V      |        |        | V + NA                   |    |
| MW-108                            |                         | WL     |        |        | WL                       |    |
| MW-111                            |                         | WL     |        |        | WL                       |    |
| MW-112                            |                         | V + NA | V + NA |        | V + NA                   | V  |
| <b>Layer 2 Piezometers</b>        |                         |        |        |        |                          |    |
| P-101                             |                         | WL     |        |        | WL                       |    |
| P-102                             |                         | WL     |        |        | WL                       |    |
| P-103                             |                         | V + NA | V + NA |        | V + NA                   | V  |
| P-104                             |                         | WL     |        |        | WL                       |    |
| P-106                             |                         | V      |        |        | V + NA                   |    |
| P-107                             |                         | V      |        |        | V + NA                   |    |
| P-108                             |                         | WL     |        |        | WL                       |    |
| P-111                             |                         | WL     |        |        | WL                       |    |
| <b>Layer 3 Piezometers</b>        |                         |        |        |        |                          |    |
| MW-3B                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | WL |
| P-103D                            | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-111D                            | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-113B                            | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | WL |
| P-114                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-115                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-116                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-117                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-118                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| <b>Layer 4 Piezometers</b>        |                         |        |        |        |                          |    |
| MW-3A                             | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-107D                            | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| P-113A                            | V + NA                  | V + NA | V + NA | V + NA | V + NA                   | V  |
| <b>Private Well</b>               |                         |        |        |        |                          |    |
| Rohde (8")                        |                         | V*     |        |        | V*                       |    |
| <b>Landfill Monitoring Points</b> |                         |        |        |        |                          |    |
| LC-1                              |                         | L      |        |        | L + NA                   |    |
| LC-2                              |                         | L      |        |        | L + NA                   |    |
| LC-3                              |                         | L      |        |        | L + NA                   |    |

Notes:

Q1, Q2, Q3, Q4 = quarterly sampling events

S1, S2 = semiannual sampling events

V = measure water level and collect groundwater sample for VOCs analysis (EPA 8260C)

V\* = collect groundwater sample for VOCs analysis (EPA 524.2)

NA = collect groundwater or leachate sample for sulfate (EPA 9056A), nitrate+nitrite (EPA 353.2), and dissolved Mn (EPA 6010C) analysis

WL = water level measurement only

L = collect leachate sample for VOCs analysis (EPA 8260C)

Updated by: A.Stehn 08/10/2021

Checked by: S.Sellwood 08/10/2021