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June 28, 2007

Ms. Pat Chung
Wisconsin Department of Natural Resources
Southeast Region Headquarters
2300 North Dr. Martin Luther King Jr. Drive
Milwaukee, WI 53212-3128

Subject: **ORE West Plume Correspondence**
Village of Grafton
Lime Kiln Landfill
Earth Tech Project No. 30250

Dear Ms. Chung:

Earth Tech, on behalf of the Village of Grafton, is submitting this letter in response to your May 29, 2007, correspondence to the Village, regarding the ORE West Plume and the Lime Kiln Landfill projects in the Village. This letter clarifies several statements in the May 29 letter.

The WDNR references the FID number used for the Lime Kiln Landfill for both the ORE West Plume and Lime Kiln sites. While we understand the two sites share some data, we consider the two sites separate. We request the use of separate FID numbers for each site because they are two separate projects. We also request that FID 246036780 stay with the Lime Kiln site because that site has received grants under that FID and it has much more work under that FID than the ORE West Plume project.

We did not expect to discuss the Lime Kiln Landfill regarding the notice of violation for the ORE West Plume. We have responded to every WDNR request for the Lime Kiln project and have actively worked toward closure. As mentioned at the meeting, it was good to talk about the Lime Kiln project, and certainly the projects are related to the degree that the plumes are in the same area of the Village and may share a few monitoring wells. However, the Lime Kiln project status should not be in question and discussion of its status at the notice of violation meeting might have been misplaced.

Specific comments are as follows:

Conference Agreement Bullet 1: Earth Tech will make recommendations for future sampling of the existing wells monitoring the Lime Kiln plume. Earth Tech did not agree to recommend additional piezometers. At the May 23, 2007 meeting, John Feeney wondered aloud if additional piezometers would be beneficial. When John has asked this question before, Earth Tech has always responded the same way. We realize that monitoring for downgradient protection is warranted until levels are stable or decreasing. In the 1999 RI, we made the argument, and the WDNR agreed that the plume's nature and extent were adequately defined. The monitoring wells used in the RI are still sampled quarterly in the current monitoring plan. Earth Tech had also sampled at depth during the RI in several private wells that were later abandoned. There is



Ms. Pat Chung - WDNR
ORE West Plume Correspondence
June 28, 2007
Page 3

a significant confining layer below the site in the Waukesha Dolomite that has extremely low porosity and hydraulic conductivity. We also have no reasonable place to put additional piezometers in alternate locations because the river and associated wetlands are inaccessible. The current system adequately monitors the plume as it attenuates.

Conference Agreement Bullet 2: Earth Tech is preparing a sampling plan for submittal to the WDNR for the ORE West Plume investigation. At the meeting, we discussed and agreed upon one additional well to compliment the 10 wells that are already in place to monitor the plume. This well will be placed to monitor the south edge of the plume along Green Bay Road. We are not considering adding more than one well at this time, per our discussion and agreement on May 23.

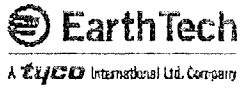
Discussion Paragraph 5: Private wells were helpful in 1999 for determining the southern extent of the ORE West Plume. Not all private wells are abandoned along Green Bay Road, and these wells will be used again to evaluate the plume extent. One new discrete monitoring well will be proposed at a location along Green Bay Road that is dependent upon property access.

Discussion Paragraph 8: We have shown that natural attenuation is occurring through several processes. After 2004, we submitted our updated monitoring plan to the WDNR recommending that sampling be reduced to VOCs only, because natural attenuation was clearly documented as occurring. We did not submit the review fee at that time because it was our understanding that it was not necessary. We did make John aware of the plan to sample only VOCs. Earth Tech will continue to monitor the VOC trends within the plume, and to ensure downgradient users that their drinking water was suitable for use. Our intent was not to request closure, it was simply to reduce the monitoring plan after 5 years, as we had previously outlined in 1999. The site does require continued monitoring because one well shows an increasing trend of TCE breakdown products.

Discussion Paragraph 8: The WDNR did not request additional wells. John Feeney has forwarded only one correspondence to the Village since 2005 that is specific to the Lime Kiln Plume. His August 10, 2005, letter was received and we responded to that letter via phone call and e-mail, and submittal of the 2004 Annual Report. There was no specific request for additional piezometers in that letter. I spoke with John after receiving the letter. According to my phone log, he mentioned that he was working on a more specific letter regarding the Lime Kiln Plume. I explained that deep piezometers were not feasible or necessary for several reasons, which are detailed in the annual report and the RI. We agreed to wait until John's letter to have a further discussion. To my knowledge, the Village had not received a letter specifically requiring additional piezometers. We have heard nothing further from the WDNR regarding the Lime Kiln Plume until the ORE West Plume notice of violation meeting.

Discussion Paragraph 8: Please note that Sigma is not involved in this project.

Discussion Paragraph 8: The Village has a draft of the 2006 Lime Kiln Annual Report. Earth Tech will submit the Annual Report before June 30, 2007.



Ms. Pat Chung - WDNR
ORE West Plume Correspondence
June 28, 2007
Page 3

If you have any questions or comments, please let me know. It was good to speak with you and we look forward to working with the WDNR to close the ORE West Plume in a timely manner.

Sincerely,

Earth Tech, Inc.

BJ.LeRoy

Digitally signed by BJ LeRoy
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B.J. Le Roy
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