



May 1, 2019

Ms. Amber Thomas
Village of Grafton
675 North Green Bay Road
Grafton, WI 53024

Subject: Request for Status Update
Grafton Lime Kiln Park and Lime Kiln Park Grafton Village, Green Bay & Falls Roads, Grafton
BRRTS #: 02-46-549906, FID #: 246036780
BRRTS #: 02-46-000743, FID #: 246036780

Dear Ms. Thomas:

In a letter dated September 9, 2011, the Department of Natural Resources (DNR) sent a letter reminding the Village of Grafton to assess the vapor intrusion pathway in relation to the contamination at the sites referenced above. In 2018, based on an informal DNR review of the 2017 groundwater monitoring report for the West Plume, the DNR notified your consultant, in an email dated July 24, 2018, that a vapor intrusion analysis was needed, and again reminded you and your consultant of that requirement in an on-site meeting on October 17, 2018. To date the DNR has not received the vapor assessment. The purpose of this letter is to request that you direct your consultant to provide the DNR with a vapor intrusion pathway screening analysis, and an updated groundwater monitoring report. [Note that surface water samples are not adequate to assess the vapor intrusion pathway in the subsurface]

Background

In 1997, chlorinated volatile organic compounds (CVOCs) contamination was detected in several residential private water supply wells to the southeast of the Lime Kiln Park Landfill. In May of 1997, the DNR directed the Village of Grafton to hire a consultant to investigate the former landfill as the likely source of the contamination found in the wells. In 1998, the Village's consultant began extensive groundwater investigations to delineate the extent and degree of contamination that came from the landfill, and in the process, also identified an additional groundwater contaminant plume (the West Plume) from a different source. In 1999 the Village received a grant from the DNR to cover investigation costs, and the Village signed an agreement to take responsibility for the West Plume, as well as the Lime Kiln Park landfill contamination.

Work Needed

- Pursuant to Wis. Admin. § NR 716.07(7), provide to the DNR a vapor intrusion screening of nearby receptors. The Manchester Drive subdivision is of concern because of a Wis. Admin. § NR 140.10 Enforcement Standard exceedance for TCE that was identified in water table well MW-8A. In addition, homes along Green Bay Avenue in the West Plume should be assessed for vapor intrusion potential. DNR guidance document RR-800 provides methods and considerations for making this evaluation.

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- Pursuant to Wis. Admin. § NR 700.11(1)(a), submit an updated groundwater monitoring and progress report. Submit a groundwater monitoring and progress report annually thereafter, with both Lime Kiln Park Landfill and West Plume BRRTS activities addressed in the same report.
- Correct the errors, and resubmit (in electronic format) in the report, *Site Investigation and Preliminary Remedial Action Identification*, AECOM, February 2017. Two shallow wells, MW-2A, and MW-8A, as described on Page 20 of the report, were mis-labeled as piezometers with a "P" designation rather than "MW" in the tables, cross section, and maps. Also, MW-8A and P-8B need to be labeled and indicated on Figures 7 and 8.

Schedule

The DNR is requesting that you have your consultant submit the vapor intrusion screening analysis, and the groundwater monitoring and progress report by June 4, 2019. Include a written response to the items bulleted above in this letter in the report. The DNR suggest that at any time after the above activities are complete, you submit a request, with a fee for technical assistance, for a DNR review and of these cases with a written response.

If you have any questions or concerns regarding this letter, please contact me, the DNR Project Manager, at (920) 893-8523, or by email at johnm.feeney@wisconsin.gov.

Sincerely,



John Feeney, PG
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources

Cc: Mr. Jeff Maletzke, AECOM
Mr. David Buser, DNR WMM Program
SER File