

**From:** Feeney, John M - DNR  
**Sent:** Monday, June 22, 2020 1:39 PM  
**To:** 'Stollenwerk, Marita'  
**Cc:** Amber Thomas (athomas@village.grafton.wi.us)  
**Subject:** RE: Compliance Assistance Address - COVID 19 - Lime Kiln Landfill, BRRTS #: 02-46-000743, and BRRTS #: 02-46-549906

Hi Marita. Here is the DNR's response to the 2<sup>nd</sup> COVID 19 Compliance Assistance Request for Lime Kiln Park, having to do with the investigation of potential vapor intrusion at homes on Manchester Drive and Green Bay Avenue:

On June 9, 2020, you submitted a Compliance Assistance Request for the Grafton Vil (BRRTS No. 02-46-000743) and Grafton Lime Kiln Park (BRRTS No. 02-46-549906) projects. You stated that field work related to vapor testing was delayed due to the Governor's Safer at Home order for the COVID-19 pandemic. Based on the information provided, the DNR has the following recommendations:

- At this time, DHS generally recommends that all vapor investigations and mitigation work move forward, especially when trichloroethylene ("TCE") is present due to acute health risks, following recommendations from the Centers for Disease Control and Prevention (CDC) regarding physical distancing and wearing proper protective gear. An exception would be if one of the buildings of concern is especially susceptible to COVID-19 such as a nursing home or hospital where a local health order restricting access may be in place. Consultation with DHS and the local health department will then be necessary.
- Regardless, after reviewing the details of this site, it became clear that the priority is to first collect information necessary to determine if this site "screens in" for needing a vapor investigation as outlined in Section 3.4.2 of RR-800, Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin. We understand that previous conversations between DNR and the consultant for the Village took place with the understanding that TCE is present above the enforcement standard in shallow groundwater (meaning groundwater contamination in monitoring wells screened across the water table), which translates into the need to quickly assess demographics and investigate for vapor intrusion as outlined in Section 3.4.1 of RR-800 and in compliance with Wis. Admin. Code chs. NR 708 and 716. However, further review of site data revealed that it is unclear if shallow groundwater (meaning groundwater contamination in monitoring wells screened across the water table) contamination exists and must first be determined.
- Your compliance assistance request stated that you plan to submit a workplan to assess the presence of shallow groundwater contamination. Due to the potential for acute vapor risk related to TCE, this work should occur as soon as possible.

Please let me know if you have any questions as you develop the work plan.

Thank you.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

**John Feeney**

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**From:** Stollenwerk, Marita <MStollenwerk@trccompanies.com>  
**Sent:** Tuesday, June 09, 2020 11:53 AM  
**To:** Feeney, John M - DNR <JohnM.Feeney@wisconsin.gov>  
**Cc:** Amber Thomas <athomas@village.grafton.wi.us>  
**Subject:** Compliance Assistance Address - COVID 19 - Lime Kiln Landfill, WDNR License 3602

Hello John,

In response to your COVID19 Compliance Assistance update request you indicated on our call that we could provide an update using a similar format as last provided. Please let myself or Amber Thomas (cced on this email) know if you have any questions.

1. Name of the facility/site – Lime Kiln Park – **Grafton Vil (BRRTS No. 02-46-000743), Grafton Lime Kiln Park (BRRTS No. 02-46-549906)**
2. Contact information for the central point of contact for the facility/site:
  1. Name of person notifying – **Marita Stollenwerk, TRC on behalf of Amber Thomas, Director of Public Works, Village of Grafton**
  2. Address – **675 N. Green Bay Road**
  3. City/Town – **Grafton**
  4. State/Province - **WI**
  5. Zip/Postal Code - **53024**
  6. Email Address – [athomas@Village.Grafton.wi.us](mailto:athomas@Village.Grafton.wi.us) / [mstollenwerk@trccompanies.com](mailto:mstollenwerk@trccompanies.com)
  7. Phone Number – **Amber 262-375-5325 / Marita 262-328-4528**
  8. Primary DNR Contact for Site or Facility – **Amber Thomas**
3. State what specific statute/rule/permit condition the individual party is looking for flexibility from.

**The WDNR Request for Status Update letter dated May 1, 2019 noted that pursuant to Wis Admin § NR 716.07(7) a vapor intrusion screening is required of nearby receptors. The previous environmental consultant for the Village of Grafton submitted a response dated July 2, 2019 proposing sub-slab vapor and indoor air sampling at three residences in the Manchester Drive area (1767, 1749, and 1741 Manchester Drive). The Village of Grafton is requesting flexibility for this sub-slab vapor investigation in light of concerns regarding interior access during the pandemic.**

4. Include the reasoning/rationale for the request and related to the COVID19 emergency (1 paragraph summary on why the COVID19 emergency justifies the assistance sought and what actions the requestor took prior to the request to meet the requirement).

**The Village requests flexibility with sampling requirements to avoid interior access to private residences during the pandemic. The Village will submit a letter workplan detailing an alternate approach to assess shallow groundwater concentrations as an alternative to sub-slab vapor and indoor air sampling during the pandemic. In addition, well MW-8A was incorrectly stated to be a water table well in the February 2017 *Site Investigation and Preliminary Remedial Action Identification Report* updated in the July 2, 2019 *Request for Status Update* letter. Based on information provided by Marita Stollenwerk to John Feeney and Joseph Martinez of the DNR via email on May 27, 2020, MW-8A is not screened at the water table, but rather is screened from 105 to 115 ft below ground surface.**

**Of note, the WDNR requested information on the demographic makeup of the Town of Grafton neighborhood overlying the plume. While this specific detail was not able to be obtained in this response period, according to the attached 2016 Ozaukee County Health Data Report, approximately 16.5% of the population in Ozaukee**

County are considered women of childbearing age (between 15-44 years of age). We have a request in to the Washington/Ozaukee County Health Department for more specific detail and will send that to you as soon as received from them.

5. Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any).

**A letter workplan detailing an alternate approach to assess shallow groundwater concentrations for the vapor screening assessment will be provided shortly with a review fee of \$700. If acceptable, this scope of work will be implemented upon receipt of approval from the WDNR.**

6. Specify the specific time period that the request is for including the rationale.

**This request extends throughout this pandemic. An alternate scope of work will be proposed to assess shallow groundwater concentrations to resolve the WDNR concerns regarding vapor.**

Please let me know if you have any questions.

Thank you,

Marita

**Marita D. Stollenwerk, P.G.**  
Senior Project Manager  
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