



June 20, 2013

Linda Benfield  
Foley & Lardner  
777 E. Wisconsin Avenue  
Milwaukee, WI 53202

Lester Bartel, Chairman  
Town of Grafton  
1230 Eleventh Avenue  
PO Box 143  
Grafton, WI 53024

Dear Ms. Benfield and Mr. Bartel:

**Subject:** Approval of your Revised Remedial Design Report, Denow Landfill Site, Grafton, file reference FID #246 048000, BRRTS #0246000735.

Thank you for submitting a revised remedial design plan to the department. Your plan is to continue groundwater sampling in order to demonstrate that natural attenuation is occurring at the site, and to demonstrate that the contaminant plume concentrations are decreasing and/or are stable, and to continue to maintain the landfill cap. Your remedial design report includes a very detailed sampling schedule in the form of a table. Some wells are designated to have as little as two years biannual sampling (twice yearly), and some wells are designated to be sampled quarterly for two years, then sampled biannually for three additional years. The Wisconsin DNR has reviewed, and approves your plan for the Denow Landfill with the following conditions:

- Determine vapor intrusion risk to the two houses to the west of the landfill (nearby monitoring well MW-13 has TCE contamination). The department suggests that you put in a shallow (ground water table) monitoring well west of MW-13 to determine if the contaminant plume is shallow enough to pose a risk in that direction.
- The private water supply wells in the sampling plan on Edgewater Drive near the river should be sampled more frequently in light of the recent PAL exceedance there for vinyl chloride (2246 Edgewater Drive). The department requires bi-annual (twice yearly) sampling, at a minimum, over the five year monitoring period for these wells. As called for in your plan, these results should be sent to the department within 10 working days of your consultant's receipt of the analysis. Send me these results directly, at the Plymouth WDNR office, tabulated and attached to a letter. If there are VOC detects, you must offer the home owner(s) a copy of the results.
- If there is a PAL exceedance in an in-use potable well, you must inform the home owner(s) in the form of a letter and attach the results. Re-sampling must occur within 90 days (not just in the case of an ES exceedance as called for in your plan).

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- The Town must come up with a plan to protect any future potable well installations within or near the contaminant plume. This may include requiring written permission from the WDNR prior to well installation.
- The department reserves the right to require remedial action or other actions if any monitoring wells show that the concentrations are increasing dramatically and continuously (for example, order, or orders of magnitude increase in vinyl chloride concentrations), or if the contaminant plume size becomes dramatically bigger. The department does not accept a natural attenuation argument based on a “decreasing chlorine number”, a number that is weighted to parent product concentrations. This is due to the increased toxicity of vinyl chloride over its parent products.

I have responsibility for this case now. I am taking over from Nancy Ryan, the former WDNR project manager. If you have any questions about this letter, please call me at 920-892-8756, extension 3023.

Sincerely,



John Feeney

Wisconsin Department of Natural Resources

Cc: Environ  
Stantec  
SER File