

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE:

SUBJECT: Regional Decision Team Strategy Decision Summary for the
Sanitary Transfer & Landfill - Delafield site, Wisconsin (WID988610176)

FROM: Jodi Traub, Associate Division Director
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TO: File

Attached is the Regional Decision Team (RDT) strategy decision summary for the Sanitary Transfer & Landfill - Delafield site, Wisconsin. Due to a disagreement between State and Regional members of the Site Assessment Team (SAT), two strategies were presented by SAT members on May 26, 1994. The RDT proposed a compromised strategy which is described in the attached decision summary.

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

REGIONAL DECISION TEAM STRATEGY DECISION SUMMARY
FOR THE SANITARY TRANSFER & LANDFILL - DELAFIELD
DELAFIELD, WISCONSIN
(WID988610176)

STATEMENT OF PURPOSE

On May 26, 1994, the Site Assessment Team (SAT) for the Sanitary Transfer & Landfill - Delafield (STL) site presented to the Regional Decision Team (RDT) two different strategies, due to a disagreement between Regional and State members of the SAT. This decision summary presents both approaches as well as the strategy approved by the Region 5 RDT.

STRATEGIES

U.S. EPA RECOMMENDATIONS

Based on the evaluation of site characterization, analytical data, removal investigation, ecological risk evaluation, and health consultation, the U.S. EPA members of the SAT believe that the site lacks the critical requirements of a National Priorities List (NPL) caliber site and a time-critical action will sufficiently reduce any health and environmental threat that the site may pose. Based on the non-NPL caliber of the site, the U.S. EPA members of the SAT understand that no additional site assessment work should be funded with Federal monies. However, the Region showed willingness to re-evaluate the case if new information warrants further consideration.

The U.S. EPA SAT members recommended a No Further Remedial Action Planned (NFRAP) designation for the site based on the information summarized as follows:

- There are health concerns over drinking water with elevated levels of manganese, which were found in five residential wells above Maximum Contaminant Level Goal (MCLG). However, one of these homes was able to reduce the level of manganese from 700 $\mu\text{g/l}$ to less than 15 $\mu\text{g/l}$ by using an ordinary water softener. Therefore, the removal program will have water softeners installed in the other affected homes. This will alleviate the health concerns associated with ingestion of the groundwater.

~~Concerns about the contents of the landfill leachate, VOCs in the landfill vents, and the possibility of methane entering nearby homes will also be addressed.~~ It was shown that even in its most concentrated form (prior to dilution that would occur in the groundwater), the leachate currently being collected has few exceedences of Maximum Contaminant Levels (MCLs) or levels equivalent to 10^{-6} (or Hazard Quotient = 1) risk. As such, the leachate does not appear to be extremely toxic. With respect to the VOCs in the landfill vents and the potential methane seepage, the removal program proposed to conduct air monitoring around the perimeter of the landfill for VOCs and in some nearby basements for methane. Because of the levels of VOCs currently found at the vents and the absence of homeowner complaints of landfill gas odors in their basements, neither are expected to pose a problem.

- Time-critical action, requested through the issuance of a Notice Letter, to install water softeners, conduct air monitoring sampling for VOCs and methane will address removal assessment findings and health consultation concerns. Please note that 1,2-dichloroethane was found at or below its MCL of 5 µg/l (or parts per billion, ppb) and therefore is no longer considered a concern to the Region.

- The State has not been able to present a solid score above 28.5 supported by a well-documented HRS package. Few final packages have been scored using only pollutants or contaminants and no sites have gone final with manganese as the only observed release substance. For U.S. EPA Headquarter's approval, a pollutant or contaminant must be shown to be present in high enough concentrations and in a form or state in which it would be considered hazardous to human health or the environment. This type of listing would also be problematic for cost recovery. Due to the documented information from the site (e.g., nature of the leachate) a quality assurance approvable package is not likely to be prepared.

- Regional effort to accommodate the State's request for a Potentially Responsible Party (PRP) search will be done through the inclusion of 104(e) information request questions in the Notice Letter. A costly and thorough PRP search was not recommended due to the non-NPL caliber designation by the Region.

- No present ecological risk at the site.

STATE RECOMMENDATIONS

The Wisconsin Department of Natural Resources (WDNR) believes the site is NPL caliber because it meets both the U.S. EPA/Headquarters and U.S. EPA Region 5's definition of NPL caliber due to the fact that the site has the potential to score greater than 28.5. In addition, Region 5 has added to that definition the need for environmental or human health risks posed by the site. The Health Consultation conducted by ATSDR and reviewed by the Wisconsin Division of Health concludes that this site poses a health hazard based on groundwater and air problems at the site. The State proposed the following actions:

- The WDNR recommended to use existing Cooperative Agreement (CA) monies to conduct a limited Expanded Site Inspection (ESI) at the site including the use of a geoprobe for collecting groundwater samples. This would obtain additional groundwater information to further document additional hazardous substances in the groundwater. Since there is an absence of this type of groundwater information at this time, WDNR believes this lowers U.S. EPA's priority for this site. Should additional hazardous substances be found at the site, which the State believes is likely given the nature of the leachate being generated, the priority of this site will likely be raised. No new funding is requested for this action.

- The WDNR requested a PRP search to be conducted at the site. The State does not have the enforcement capabilities (i.e., authority) at landfills to require generators and transporters to take remedial actions through our solid waste program. The State believes a thorough PRP search and subsequent notification letters will likely result in saving Federal resources in the long term. Since U.S. EPA policy encourages early PRP searches for NPL caliber sites prior to their placement on the NPL, the WDNR is requesting such actions take place at this site. The State believes this will provide positive results of U.S. EPA, the WDNR, as well as the health of those living in close proximity to the site. Should potentially responsible parties be found for the site, it is likely Superfund resources would not be necessary for future actions at the site,

saving both State and Federal resources.

The WDNR supports the recommendations of the ATSDR to conduct additional air quality monitoring, including methane monitoring around the site. The State believes this will help protect those living in close proximity to the site.

CONCLUSION

Due to the health concerns presented by the ATSDR and the WDNR representatives during the RDT meeting, the RDT members concluded that it would not be appropriate to NFRAP the site at this time. The RDT understands that the site conditions warrant the benefit of the installation of a newly-constructed or clearly reliable downgradient monitoring well. Therefore, the RDT recommended the use of Federal Site Assessment CA monies for the installation of a maximum of three monitoring wells to further characterize the groundwater and evaluate the potential threat to human health. This sampling event should take the form of an ESI.

In addition, the RDT agreed that the proposed time-critical removal action presented by the U.S. EPA members should be conducted to address the health consultation concerns, with the exception of the collection of leachate seepage samples due to data QA concerns raised by the State. Therefore, the State's sampling event will include the collection of the leachate seepage samples proposed by the Removal Program.

It was the consensus of the RDT that this is the most appropriate strategy at this time, and therefore, is approved.