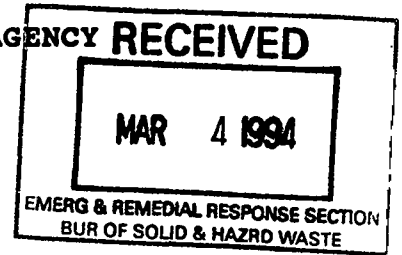


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



DATE: February 4, 1994

SUBJECT: Documentation of a "Non-Significant Change" to the Record of Decision for the Stoughton City Landfill site

FROM: Mary Tierney *MT*
Remedial Project Manager

TO: Administrative Record file

PURPOSE

The purpose of this memorandum is to document a minor change in the Record of Decision (ROD) for the Stoughton City Landfill site in Stoughton, Wisconsin. The ROD was signed on September 30, 1991. The minor change pertains to timeframes specified in the ROD for completion of additional field work and submittal of a Groundwater Assessment Report. The intent of including the timeframes in the ROD was to ensure that the work was completed within a reasonable length of time. Circumstances that arose after the ROD was signed, however, resulted in the original deadlines being unrealistic. Because modifying these timeframes does not significantly affect the scope, performance, or cost of the remedy, the change is considered non-significant.

NON-SIGNIFICANT CHANGE

The non-significant change involves four references to a 12-month time period on page 17 of the ROD. In all four instances, the time period should be revised to be 30 months instead of 12. Specifically, in the first sentence of Section IX.2 on page 17 of the ROD, "12-month period" is changed to read "30-month period", and in the first sentences of Sections IX.1, IX.2, and IX.3 on page 17, "within 12 months" is changed to read "within 30 months".

EXPLANATION OF NEED FOR NON-SIGNIFICANT CHANGE

Part of the selected remedy for the Stoughton City Landfill site was a contingency plan to conduct groundwater extraction and treatment unless additional work indicated that treatment would not be necessary in order to achieve compliance with State groundwater quality standards. This additional work, which included the installation of additional monitoring wells,

sampling and analysis of new and previously existing monitoring wells, and sampling and analysis of City of Stoughton Municipal Wells No. 3 and No. 6, was to be completed within 12 months of the effective date of the ROD. At the time the ROD was written, it was assumed that the Potentially Responsible Parties (PRPs) would be doing the additional work. Timeframes for completion of the additional work were included in the ROD to provide the PRPs with a deadline. However, due to delays caused in part by the need to transfer the work to an EPA contractor, monitoring wells were not installed until Summer 1993. Groundwater sampling was completed in October 1993. To make the ROD consistent with when the work was actually completed, the changes documented in this memorandum are necessary.

Note: This is the second Documentation of Non-significant Change. The 12-month deadline discussed in this memorandum was initially changed to 24 months, as documented in the memorandum to the Administrative Record file dated September 28, 1992.

cc: Mark Giesfeldt, WDNR
Gary Edelstein, WDNR
Linda Meyer, WDNR
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