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EXPLANATION OF SIGNIFICANT DIFFERENCES  
STOUGHTON CITY LANDFILL SITE  
RECORD OF DECISION DATED 9-30-91

Subsequent to the signing of the Record of Decision (ROD) on September 30, 1991, a change in the Remedial Action selected in the ROD has been proposed. This is a significant change to a component of the remedy with respect to its scope and cost. I am hereby approving this change to the ROD and providing public notice of this change in accordance with CERCLA Section 117(c).

INTRODUCTION

The Stoughton City Landfill is located in the Northeast section of Stoughton, Dane County, Wisconsin. A Remedial Investigation and Feasibility Study (RI/FS) was conducted by Uniroyal Plastics, Inc. and the City of Stoughton and on September 30, 1991, U.S. EPA issued a ROD that selected the cleanup remedy at the site. The Wisconsin Department of Natural Resources (WDNR) reviewed and provided comments on the RI/FS and the ROD as these documents were developed. The State of Wisconsin also concurred on the remedy selected by the ROD.

One of the components of the remedy was the "Excavation of wastes in contact with the groundwater in the southeastern and northeastern sections of the site, and consolidation of these wastes under the cap".

During predesign activities the current depth and extent of waste materials in the landfill was evaluated. In addition the sediment and surface water adjacent to the landfill were sampled and the results were used to determine the impact of this waste on the landfill. Based on this evaluation, it is apparent that a more limited waste consolidation than selected in the ROD would still achieve the requirements of CERCLA and the National Contingency Plan (NCP), as well as the recommendation goals stated in the ROD. This change will improve the remedy by limiting the impact of construction on the adjacent wetland and the potential for further releases of waste constituents into the wetland.

SITE HISTORY, CONTAMINATION PROBLEMS AND THE SELECTED REMEDY

The City of Stoughton purchased the original 40-acre site in July 1952, and annexed it in September 1952, when landfill operation began at the site. Between 1952 and 1969, the site was operated as an uncontrolled dump site. During this time, refuse was usually burned or covered by dirt. In 1969, the site began operation as a State-licensed landfill. In 1977, the Wisconsin

Department of Natural Resources (WDNR) required that the site be closed according to State regulations. Closure activities included construction of a trash transfer station, placement of cover material borrowed from the northwest portion of the site and from an agricultural area, and seeding. From 1978 to 1982 only brick, rubble, and similar construction materials were accepted at the site while closure work was performed. The landfill was officially closed in 1982.

Common municipal waste and both dry and liquid wastes were disposed at the Stoughton City Landfill. Dry waste included sludge materials, empty rejected metal spray containers (used for storing multi-purpose lubricants), and used appliances. Some sludge materials containing 2-butanone, acetone, tetrahydrofuran, toluene and xylene mixtures, were disposed at the site from 1954 until 1962. During this period, the liquid wastes were commonly poured over garbage and burned. It was also reported that some liquid wastes were poured down holes drilled to test auger drilling equipment in the west-central portion of the landfill.

The Stoughton City Landfill is currently an inactive facility. Vehicular access to the site is controlled by a set of gates that are kept locked at all times. In addition, snow-fencing was installed along the southern property boundary upon initiation of the RI. Warning signs were placed along the snow-fencing and on signposts installed on the west, north, and east property boundaries.

The site was placed on the National Priorities List (NPL) in June 1986. In March 1988, Uniroyal Plastics, Inc. and the City of Stoughton (the Potentially Responsible Parties or PRPs) entered into an Administrative Order by Consent ("AOC", or "the Order") with U.S. EPA and WDNR for the conduct of a Remedial Investigation and Feasibility Study (RI/FS).

RI field activities began in March 1989. The first round of groundwater monitoring occurred in May and June 1989. Routine analyses were run for Target Compound List (TCL) inorganics and organics as well as for non-standard volatile organics; tetrahydrofuran (THF), trichlorofluoromethane and dichlorodifluoromethane. A second round of groundwater sampling occurred in May and June 1990. At that time background surface water and sediment samples were taken from the wetlands east of the site and from the area between the Yahara River and western edge of the Site.

A ROD was signed on September 30, 1991. Remedial measures for the site included:

- \* Site security measures including the placement of a fence around the entire Site perimeter;

- \* Placement of a solid waste disposal facility cap (NR 504 cap) over the Site;
- \* Extraction and treatment of contaminated groundwater, unless additional monitoring indicates that groundwater extraction is not required to achieve compliance with the State's ch. NR 140, Wis. Adm. Code, groundwater quality standards, and subsequent discharge to the Yahara River of the treated groundwater in compliance with Wisconsin Pollution Discharge Elimination System (WPDES) effluent limitations;
- \* Excavation of wastes in contact with groundwater in the southeastern and northeastern sections of the Site, and consolidation of these wastes under the cap;
- \* Land use restrictions to prevent the installation of a well within 1200 feet of the property boundary and to prevent residential development of the site;
- \* Long-term groundwater monitoring to confirm the effectiveness of the other components of the selected remedial action.

**DESCRIPTION OF THE DIFFERENCE IN THE ESD AND THE BASIS FOR THE DIFFERENCE.**

The ROD provided for the "excavation of wastes in contact with the groundwater in the southeastern and northeastern sections of the site, and consolidation of these wastes under the cap".

During predesign activities the U.S. EPA contractor evaluated the current depth and extent of waste materials in the landfill. The sediment and surface water adjacent to the landfill were sampled and the results used to determine the impact of this waste on the wetland. Based on this evaluation, a limited waste consolidation activity that will achieve the intent of ROD, but limit the disturbance of waste materials and reduce the potential for further releases into the wetland is proposed. Waste will be excavated from the edge of the landfill/wetland interface to approximately 20 feet into the body of the landfill. The waste will be dewatered and consolidated in the control portion of the landfill. Exposed waste and debris lying in the wetland will also be brought back inside the limits of the landfill. Following removal of waste, the site would be graded and the cover system constructed. The need to cover any wetland area will be minimized. About 5000 cubic yards of material will be excavated and consolidated under the cap instead of the 40,000 cubic yards proposed in the ROD. This limited waste consolidation will minimize the volume of water managed, thereby minimizing the potential for odor generation or additional

release/mobilization of contaminants into the wetland. The cost of the waste removal will also be greatly reduced.

A Preliminary Ecological Assessment was completed on June 11, 1991. The report concluded that attempts at sediment remediation in the wetlands would likely do more harm than good. Removing only the wastes along the wetland boundary will minimize the impact of the excavation and consolidation on the wetland and the surrounding community.

The wetland would be protected from the waste which remains in place by the cap which will be vertically keyed into the edge of the wetland. A base will be constructed at the edge of the wetland which will support the cap.

#### WISCONSIN DEPARTMENT OF NATURAL RESOURCES

The Wisconsin Department of Natural Resources concurs with the limited removal and consolidation of wastes at the site provided that a yearly wetlands sediment and water test program is implemented. The need to continue this testing will be evaluated at the five year review.

#### PUBLIC PARTICIPATION ACTIVITIES

A copy of the ESD is available for review at the:

Stoughton Public Library  
304 South 4th Street  
Stoughton, WI.

Stoughton City Hall  
381 East Main Street  
Stoughton, WI.

Stoughton Utilities Office  
211 Water Street  
Stoughton, WI.

#### AFFIRMATION OF STATUTORY DETERMINATION

Considering the reduction in the amount of waste to be excavated and placed under the cap, U.S. EPA believes that the remedy remains protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to this remedial action and is cost effective.

The remedy selected in the ROD uses permanent solutions and alternative treatment technologies to the maximum extent practicable for this site.

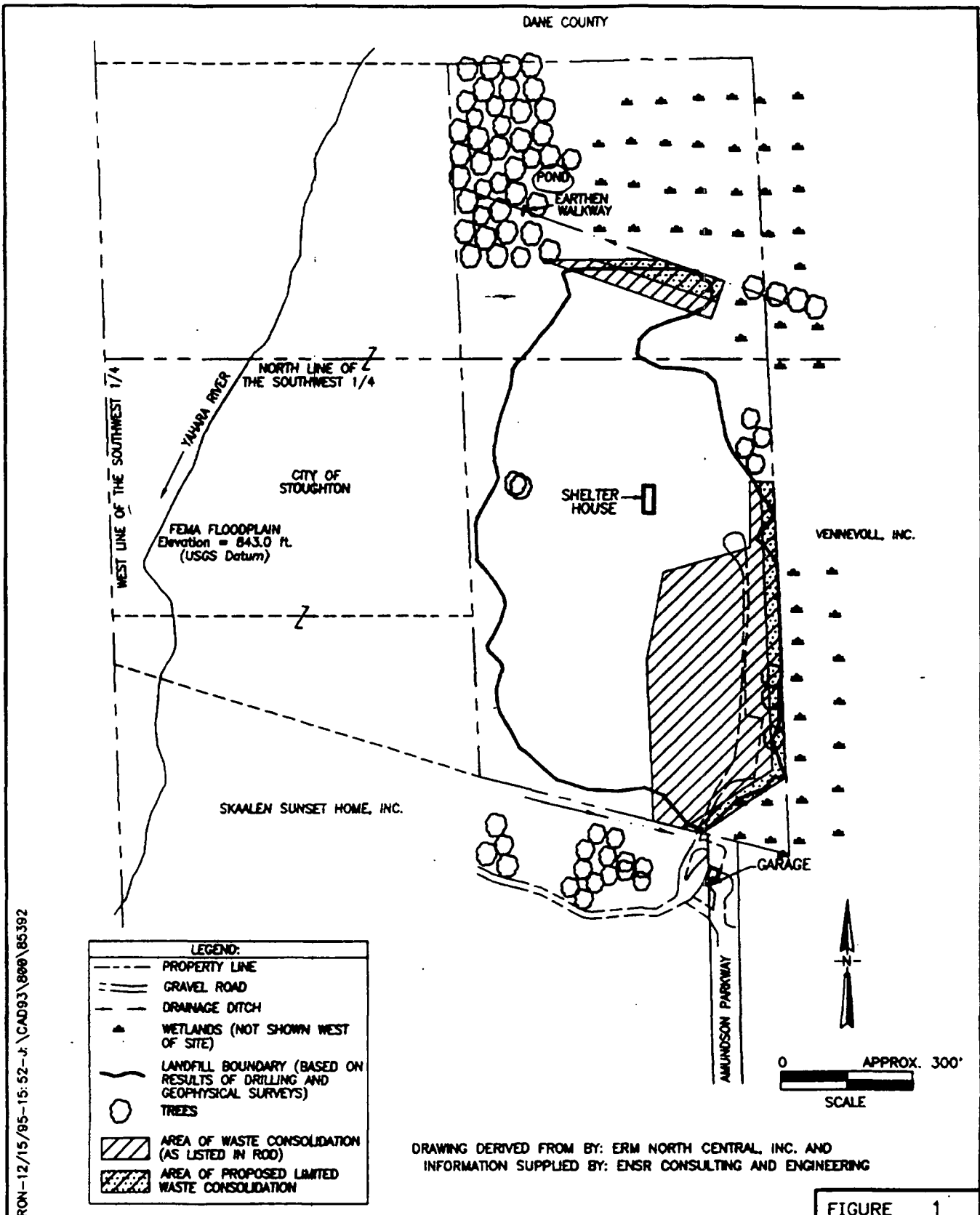
This remedy will result in less contamination and disruption of the surrounding community and the wetland while protecting the environment and do so at a lower cost than the original consolidation plan. Because the remedy selected in the ROD will

result in hazardous substances remaining on-site, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

  
WILLIAM E. MUNO, DIRECTOR  
SUPERFUND DIVISION

2/29/96  
DATE

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LEGEND:	
	PROPERTY LINE
	GRAVEL ROAD
	DRAINAGE DITCH
	WETLANDS (NOT SHOWN WEST OF SITE)
	LANDFILL BOUNDARY (BASED ON RESULTS OF DRILLING AND GEOPHYSICAL SURVEYS)
	TREES
	AREA OF WASTE CONSOLIDATION (AS LISTED IN ROD)
	AREA OF PROPOSED LIMITED WASTE CONSOLIDATION

DRAWING DERIVED FROM BY: ERM NORTH CENTRAL, INC. AND  
 INFORMATION SUPPLIED BY: ENSR CONSULTING AND ENGINEERING

FIGURE 1

ALTERNATIVE REMEDIAL CONTRACTING STRATEGY  
 U.S. EPA CONTRACT No. 68-W8-0089  
 WORK ASSIGNMENT No. 54-5NT2  
 DOCUMENT CONTROL No. 4500-54-AMDU

LIMITS OF WASTE  
 CONSOLIDATION ACTIVITIES  
 STOUGHTON CITY LANDFILL  
 Stoughton, Wisconsin

ADDITIONS TO THE ADMINISTRATIVE RECORD

<u>Report</u>	<u>Author</u>	<u>Date</u>
Preliminary Ecological Assessment for Stoughton City Landfill Site	Douglass Beltman Eileen Helmer	June 11, 1991
Letter from Roy F. Weston Inc. to Tony Rutter	William Karlovitz	October 4, 1995