



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD (SR-6J)  
CHICAGO, ILLINOIS 60604-3590

REPLY TO THE ATTENTION OF: SR-6J

August 19, 2021

Michael L. Peterson, P.E.  
Waste Management  
Closed Sites Management Group  
Waste Management, Inc.  
W124 N9355 Boundary Road  
Menomonee Falls, Wisconsin 53051

**VIA ELECTRONIC MAIL**

Re: Required Information and Documentation to Support Pilot Shutdown of Active Remediation Systems at the Hagen Farm Site, Stoughton, WI

Dear Mr. Peterson,

With the sixth five-year review behind us, I would like to focus on the pilot shutdown which involves rebound testing of the active remediation systems—low-flow air sparge (LFAS) and soil vapor extraction (SVE) at the Hagen Farm site. Waste Management of Wisconsin, Inc. (WMWI) plans to use the data collected under the pilot shutdown to support a future remedy change from active remediation to monitored natural attenuation (MNA).

In July 2019, WMWI indicated to the U.S. Environmental Protection Agency (EPA) via a letter/scope of work that it would be undertaking a pilot shutdown of the active remediation systems in order to conduct a rebound study. The study commenced in September 2019. EPA provided comments detailing revisions to the scope of work which would result in an acceptable workplan in September 2020. A revised workplan was submitted by WMWI in December 2020. In January 2021, EPA requested additional revisions to the workplan and that the Quality Assurance Project Plan (QAPP) be updated as required. EPA is awaiting these revised documents. For your convenience, I have attached the January 2021 letter from EPA which provides more detail.

The two-year pilot test is scheduled to end in September 2021. As you have indicated, WMWI plans to request approval to continue the pilot study based on the rebound test data collected so far. EPA is in the process of reviewing this data. When we have completed our assessment, we will be able to determine how well the data support continuing the pilot shutdown as well as some indication of the potential effectiveness of MNA as a final remedy. However, continuation of the pilot study is also contingent upon a final approved workplan and updated QAPP

documents. A Record of Decision (ROD) Amendment cannot be supported without all of the necessary foundational documents.

WMWI is ultimately proposing to request a change to the selected remedy from SVE and LFAS for the source control and groundwater control operable units, respectively, to MNA. For EPA to make and defend such a decision, there must be clear lines of evidence demonstrated by the monitoring data from the rebound testing, as well as sufficient documentation to support an MNA ROD Amendment. The workplan and updated QAPP will ensure that the necessary and appropriate information is provided (e.g., rationale, methods, procedures, etc.) and that the current and future data produced under this pilot study are defensible and can support a change from the current remedy. Upon receipt of these documents, I will make every effort to expedite the review process.

I hope this letter clarifies EPA's expectations. If you have any questions, please do not hesitate to contact me.

Best regards,

*Sheila A. Sullivan*

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Attachment

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