



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-359

REPLY TO THE ATTENTION OF: SR-6J

December 23, 2022

Mr. Michael Peterson, P.E.
Waste Management
Closed Sites Management Group
Waste Management, Inc.
W124N9355 Boundary Road
Menomonee Falls, Wisconsin 53051

VIA ELECTRONIC MAIL

**Re: Quality Assurance Project Plan Updates for the Hagen Farm Superfund Site,
Stoughton, Wisconsin**

Dear Mr. Peterson,

This letter is to notify you that there has been updates to EPA specifications for preparing Quality Assurance Project Plans. The U.S. Environmental Protection Agency (EPA) has developed the Quality Assurance Project Plan (QAPP) as a tool for project managers and planners to document the type and quality of data needed for environmental decisions and to describe the methods for collecting and assessing those data. The development, review, approval, and implementation of the QA Project Plan is part of EPA's mandatory Quality System. The EPA Quality System requires all organizations to develop and operate management structures and processes to ensure that data used in Agency decisions are of the type and quality needed for their intended use. The QAPP is an integral part of the fundamental principles and practices that form the foundation of the EPA Quality System.

The September 27, 2007 Consent Decree between Waste Management of Wisconsin, Inc. and EPA (07-C-0424-C) includes Section VIII, Quality Assurance, Sampling, and Data Analysis. Paragraph 20 states "Settling Defendants shall use quality assurance, quality control, and chain of custody procedures in accordance with "EPA Requirements for Quality Assurance Project Plans (QA/R5)" (EPA/240/B-01/003, March 2001), "Guidance for Quality Assurance Project Plans (QA/G-5)" (EPA/600/R-98/018, February 1998), and subsequent amendments to such guidelines upon notification by EPA to Settling Defendant of such amendment". As such this letter serves to notify you that there have been amendments and updates to the guidance documents that were used to prepare the Operation and Maintenance Plans for the Groundwater

Control Operable Unit (GCOU) dated April 1995, and for the Source Control Operable Unit In-Situ Vapor Extraction (SCOU ISVE) dated August 1993 (also see the ISVE Remedial Action Implementation Report (Warzyn, February 1994).

Below and attached are some resources and guides for putting together a Quality Assurance Project Plan document and going through the systematic planning process for environmental information operations as defined in EPA's Environmental Information Quality Policy¹. For the Hagen Farm site, an updated QAPP will encompass operation and maintenance activities and activities in response to the Five-Year Review(s).

The current guidance and requirements for QAPPs (EPA's G-5 and QA/R-5 respectively) can be found here <https://www.epa.gov/quality/epa-quality-management-tools-projects#qa-plans> .

The section in the middle of the page <https://www.epa.gov/fedfac/assuring-quality-federal-cleanups> "Uniform Federal Policy for Quality Assurance Project Plans" links to the QAPP manual (Part 1) in all its fine detail, which is extremely useful for writing the content of some of the worksheets. This section also has a link to a .zip file full of Word format worksheet templates (Part 2A) for an optimized-UFP-QAPP.

The attached Word format "ufp_wbk_0305.docx" document (converted from https://www.epa.gov/sites/production/files/documents/ufp_wbk_0305.pdf) is an assembled QAPP template in long format.

Whether the optimized worksheet format is selected or the long form (37 worksheets), using the UFP-QAPP version is consistent with our regional Superfund quality management plan (QMP) and ensures that the Agency's QAPP requirements defined in the 2006 QA/R-5 document are met. Also, all lab and field SOPs are expected to be attached to the QAPP, along with lab certifications and data validation procedures.

EPA is willing to facilitate a scoping meeting to ensure that the QAPP meets the requirements for approval. Please provide a draft updated QAPP for EPA review within 60 days of receipt of this letter. EPA appreciates Waste Management of Wisconsin's assistance in the timely completion of the QAPP updates. If you have any questions, or require additional information, please feel free to contact me at the below-listed information.

Best regards,

Sheila A. Sullivan

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¹ U.S. EPA Directive No. CIO 2105.1, March 31, 2021.

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