



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
S-6J

Darsi Foss
Division Administrator
Environmental Management Division
Wisconsin Department of Natural Resources
PO Box 7921
Madison, WI 53707-7921

Re: Need to Document Changes to Selected Remedy, Hechimovich Sanitary Landfill Site
Williamstown, WI
EPA ID: WID052906088

Dear Ms. Foss:

The U.S. Environmental Protection Agency (EPA) recently signed the Fifth Five-Year Review (FYR) for the Hechimovich Sanitary Landfill Site ("Hechimovich Site" or "Site"). One of the issues/recommendations identified in the FYR is that Site conditions have changed significantly since the original decision documents were developed and that a new decision document (or documents) is needed. Most pressing is the need for a new decision document for operable unit 1 (OU1), the source control remedy, since the source material in the original landfill has now been moved to a lined, permitted landfill.

The Wisconsin Department of Natural Resources (WDNR) signed a Record of Decision (ROD) for an interim source control remedy in January 1994 and a final Site-wide ROD in September 1995. EPA concurred with the final ROD. The selected remedy for the Site includes the following major components:

- Operation, maintenance and monitoring of landfill cap and gas system;
- Groundwater monitoring using existing wells;
- Deed restrictions, as appropriate;
- Restriction on new water supply well construction;
- Use of natural contaminant breakdown;
- New gas extraction wells and enhanced extraction from areas of high contamination;
- Connection of piping from new gas extraction well(s) to existing gas flare system; and
- Specific goals and deadlines set for contaminant breakdown; if not met, additional work may be necessary.

In 2012, WDNR notified EPA of the potentially responsible party's (PRP's) intent to move the Hechimovich source material to a lined, permitted landfill. During 2012 through early 2013, there were several discussions between EPA and WDNR management regarding the source material being moved and the need for a potential decision document to document changes to the remedy. During a call between EPA management and WDNR management on January 16, 2013, EPA stated that the movement of the source material would be considered a betterment and not a required CERCLA action. EPA also stated that any resulting change to the remedy at the Site would need to be documented in an appropriate decision document.

The PRP completed the movement of the source material in 2016. During a call between EPA management and WDNR management on June 6, 2017, EPA reiterated the need to document the changed conditions at the Site and the resulting change to the remedy. EPA explained that this could be accomplished with an Explanation of Significant Differences that includes an opportunity for public comment.

Due to the movement of the source material, EPA believes that the following major components of the selected remedy, as listed above, are no longer relevant and should be documented as such in an appropriate decision document:

- Operation, maintenance and monitoring of landfill cap and gas system;
- New gas extraction wells and enhanced extraction from areas of high contamination; and
- Connection of piping from new gas extraction well(s) to existing gas flare system.

EPA looks forward to working with WDNR on documenting the changes to the selected remedy at the Hechimovich Site due to changed Site conditions. If you have any questions regarding this letter, please feel free to contact me, or your staff may contact Sheila Desai, Remedial Project Manager, at (312) 353-4150 or desai.sheila@epa.gov.

Sincerely,

7/10/2019

X 

for Douglas Ballotti, Director
Superfund & Emergency Management Div.
Signed by: SAMUEL BORRIES

cc: Sheila Desai, U.S. EPA
Mark Koller, U.S. EPA
Trevor Bannister, WDNR
Judy Fassbender, WDNR