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

Reply to Attention of:
SR-6J

EMAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 31, 2015

Michael Peterson
Closed Sites Management Group
W124N9355 Boundary Road
Menomonee Falls, WI 53051

Subject: 2015 H.O.D. Landfill Five-Year Review Issues and Recommendations
Site ID#: 052F (H.O.D. Landfill, IL Superfund Site)

Dear Mr. Peterson:

The United States Environmental Protection Agency Region 5 has determined in the H.O.D. Landfill Five-Year Review Issues and Recommendations Summary, dated September 24, 2015, that in order for the remedy to be protective in the long term, the following actions need to be taken: record Environmental Covenants; revise the Institutional Control Plan; address the leachate collection system to ensure it is functioning optimally; and monitor vinyl chloride in groundwater to assess whether improvements in the leachate collection system reduce releases from the landfill. Long-term protectiveness requires full implementation of and compliance with deed restrictions that prohibit interference with the landfill cap and other remedy components and prohibit well drilling or consumption of groundwater at the Site. This letter is to notify you that the current remedial measures should be evaluated soon to determine whether cleanup goals will be achieved within a reasonable timeframe to ensure long-term protection at the Site.

Enclosed is a copy of the 2015 H.O.D. Landfill Five-Year Review Issues and Recommendations Summary Form. The milestone due dates to complete these issues are included in the enclosure. I will contact you and the Illinois Environmental Protection Agency Project Manager soon to discuss an interim schedule for completing these remedy performance tasks in a timely manner.

Sincerely,
Karen L. Mason-Smith
Karen Mason-Smith
Remedial Project Manager
Superfund Division

Enclosure

cc: R. Ambrose, IEPA

Summary of Issues and Recommendations Identified in the 2015 H.O.D. Landfill Five-Year Review				
OU(s): 01/Sitewide	**Issue Category:** Remedy Performance			
	Issue: The leachate collection system is not functioning optimally. The system is designed to extract leachate, reduce leachate elevations within the landfill, and create an inward gradient of groundwater flow toward the center of the landfill.			
	Recommendation: Determine the cause(s) for the leachate collection system not functioning optimally and implement the appropriate actions to resolve the issue.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	PRP	EPA	09/30/2018
OU(s): 01/Sitewide	**Issue Category:** Remedy Performance			
	Issue: Vinyl chloride concentrations in groundwater are increasing and exceed the groundwater cleanup standards in the Record of Decision in one or more monitoring wells, including well US03D, and well US03S was not sampled in April 2014.			
	Recommendation: Vinyl chloride and other volatile organic compounds should be monitored in wells US03D, US03S and other wells to assess whether improvements in the leachate collection system reduce releases from the landfill. If improvements to the leachate collection system do not address the issue, additional measures to address the contamination, such as modifying in-situ geochemical conditions to enhance biodegradation, should be evaluated.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	PRP	EPA	09/30/2020
OU(s): 01/Sitewide	**Issue Category:** Institutional Controls			
	Issue: ICs have not yet been fully implemented at the Site.			
	Recommendation: WMII and the Village should submit a revised Institutional Control Plan and record Environmental Covenants reciting the restrictions the ROD requires. The Village should revise its groundwater ordinances to prohibit the installation of drinking water wells near the Site.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	PRP	EPA	09/30/2018

Protectiveness Statement(s)	
Operable Unit: 01/Sitewide	*Protectiveness Determination:* Short-term Protective

Protectiveness Statement:

The remedy at the H.O.D. Landfill Site currently protects human health and the environment because it is functioning as intended. The landfill cap, landfill gas management system, and leachate collection and storage system are functional and meeting the objectives outlined in the ROD and Explanation of Significant Differences. An ordinance requires owners within the Village to use the Village's public water supply, but does not expressly prohibit the installation of private wells near the landfill Site. In order for the remedy to be protective in the long term, the following actions need to be taken: record Environmental Covenants; revise the Institutional Control Plan; address the leachate collection system to ensure it is functioning optimally; and monitor vinyl chloride in groundwater to assess whether improvements in the leachate collection system reduce releases from the landfill. Long-term protectiveness requires full implementation of and compliance with deed restrictions that prohibit interference with the landfill cap and other remedy components and prohibit well drilling or consumption of groundwater at the Site.