

DuFresne, Kristin I - DNR

From: Executive Director <menomineecd@gmail.com>
Sent: Monday, July 17, 2017 2:03 PM
To: Punke, Emily M - DNR; Johnsonj17@michigan.gov; Axness, Kendra A - DNR; makil@michigan.gov; Angela Pierce; Anne Bartels (ABartels@marinettecounty.com); Uvaas, Benjamin J - DNR; Betsy Galbraith; Brian Hinrichs; Deborah Nett; Derek Strohl; Greg Cleereman; Heather Williams (Williams.heather@Epa.gov); Killian, James - DNR; Jay Settersten; John Lefebvre; Masterson, John P - DNR; John Perecone (Perrecone.John@epamail.epa.gov); DuFresne, Kristin I - DNR; Lynn Scherbert; Margaret Gielniewski; Michelle Bruneau; Mike Grimm; Mikulka.Michael@epamail.epa.gov; Nick Utrup; Rafael P. Gonzalez (gonzalez.rafaelp@epa.gov); Stoll, Richard C - DNR; Ryan Van Camp (rvancamp@sehinc.com); Galarneau, Stephen G - DNR; Steven_Choi@fws.gov; Susan Pastor (pastor.susan@epa.gov); Paoli, Tammie J - DNR; Pappas, Victor C - DNR; SNadeau@honigman.com; Bill Ray; Brian Miller; Chuck Boyle; Denise Taylor; Doug Oitzinger; Ed Baetke; Emily Lang; Gail Clark; Greg Sevener; Guy Reiter; James Rettke; Jean Arnold; Jim Fossum; John Clark; John Groleau; Ken & Sandy Olive; Ken Potrykus; Linda Garcia; Mike & Renae Alswager-klein; Pat & Glenda Keiran; Paul Theis; Raj Shukla; Renee Richer; Rich Mator; Rick Loeffler; Robin Quigley; Short, Jennifer L; Stephen Donohue; Steven Zander; Valerie Mellon; Becky Berry; Bougie, Cheryl - DNR; Donna Buechler; jim Cox (jimcox@tycoint.com); Jon Kukuk; Keith West; Last, Laurel L - DNR; Mark Erickson; Mark Erickson; Nancy Douglas; Stephanie Swart; Stephen Kellner (skellner1@new.rr.com); Trygve Rhude (rhude@new.rr.com)
Subject: Fwd: EPA invites comments on proposed cleanup plan for Marinette WPSC MGP site

----- Forwarded message -----

From: Last, Laurel L - DNR <Laurel.Last@wisconsin.gov>
Date: Mon, Jul 17, 2017 at 2:02 PM
Subject: EPA invites comments on proposed cleanup plan for Marinette WPSC MGP site
To: "Donna Buechler (menomineecd@gmail.com)" <menomineecd@gmail.com>

Hi, Donna,

Please forward this announcement to the CAC e-mail lists. The public review period is open on the EPA's proposed plan to clean up the soil and groundwater at the WPSC former manufactured gas plant (MGP) site near Boom Landing in Marinette. Public comments will be received until August 16th.

<https://semspub.epa.gov/work/05/935073.pdf>

Thanks,

Laurel

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Laurel L. Last
Lower Menominee River Area of Concern Coordinator

Office of Great Waters – Lake Michigan, Lake Superior, and Mississippi River
Wisconsin Department of Natural Resources

Phone: [\(920\) 662-5103](tel:(920)662-5103)

Cell Phone: [\(920\) 366-1371](tel:(920)366-1371)

Fax: [\(920\) 662-5498](tel:(920)662-5498)

laurel.last@wisconsin.gov



dnr.wi.gov



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Donna Buechler
Executive Director
Menominee Conservation District
906-753-6921 ex 101

EPA Proposes Cleanup Plan for Soil, Groundwater

WPSC Marinette Manufactured Gas Plant Site

Marinette, Wisconsin

July 2017

Your opinion wanted

EPA invites your comments on the proposed cleanup plan for the WPSC Marinette MGP site. Your input is important because EPA may modify or select another cleanup option based on public comments. There are several ways your voice can be heard during the public comment period that runs from July 17 to Aug. 16, 2017.

- Fill out and mail the enclosed comment form by the deadline.
- Email comments to EPA Community Involvement Coordinator Susan Pastor at pastor.susan@epa.gov.
- Fax comments to Susan at 312-385-5344.

To request a public meeting, contact Susan Pastor by Friday, July 21.

For more information

If you have questions about the comment period or want to learn more about the WPSC Marinette site, you can contact these EPA team members:

Margaret Gielniewski
Remedial Project Manager
312-886-6244
gielniewski.margaret@epa.gov

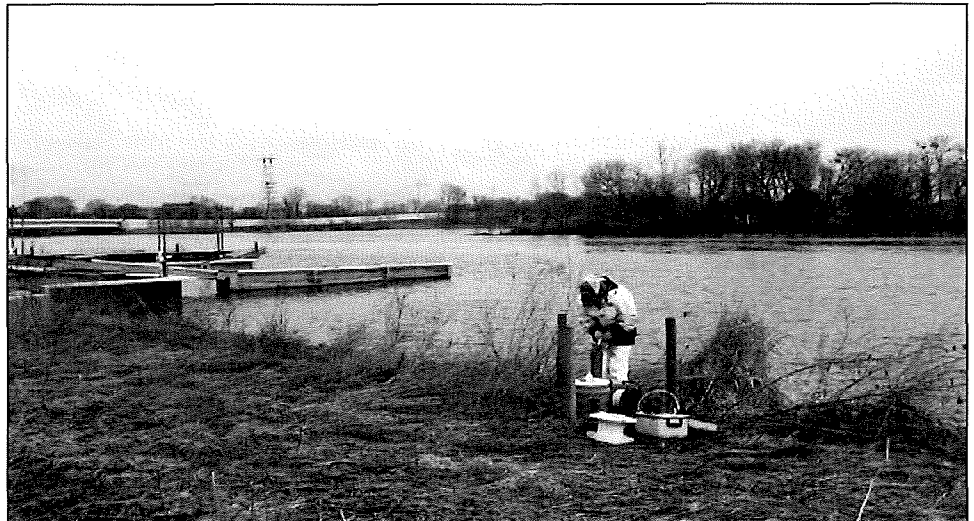
Susan Pastor
Community Involvement
Coordinator
312-353-1325
pastor.susan@epa.gov

Or visit:

www.epa.gov/superfund/wpsc-marinette

U.S. Environmental Protection Agency is proposing to clean up contaminated soil and groundwater at the Wisconsin Public Service Corp. former Marinette Manufactured Gas Plant site in Marinette, Wis. This fact sheet is a summary of the proposed cleanup plan. It outlines several proposed cleanup alternatives for the WPSC site and EPA's recommended cleanup plan. The proposed cleanup plan resulted from a study of the nature and extent of contamination at the former MGP area and an evaluation of the different cleanup options available.

EPA will not select a final cleanup plan until after it reviews comments received from the public. EPA is issuing the proposed cleanup plan as part of its public participation responsibilities under the federal Superfund law.¹ EPA may modify the proposed cleanup plan or select another option based on new information or public comments so your opinion is important.



Water level measurements being taken at a monitoring well adjacent to Boom Landing.

¹Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, known as the Superfund law) requires publication of a notice and a proposed plan for the site remediation. The proposed plan must also be made available to the public for comment. This fact sheet summarizes information contained in the feasibility study and other documents in the administrative record for the WPSC Marinette MGP site. They are available for review at the Stephenson Public Library, 1700 Hall Ave., Marinette.

Proposed cleanup options

EPA established cleanup goals for soil, soil gas (gases found in between dirt particles), groundwater and sediment, including minimizing human exposure, restoring groundwater and minimizing any movement into the Menominee River. "Groundwater" is an environmental term for an underground supply of fresh water. To meet these goals, EPA studied several alternatives for cleaning up contaminated soil and groundwater and implementing monitoring and institutional controls for sediment and soil gas. EPA developed these alternatives using combinations of different technologies and evaluated each option in detail against the selection criteria established by federal law (see box on Page 3).

Alternative 1 – No-Further Action. EPA is required to include a "no-action" alternative as a basis for comparison with other cleanup options. With no action, the contamination would remain in place and site reviews would be done every five years. **Cost: \$50,000.**

Alternative 2 – This alternative involves excavating contaminated material, installing horizontal engineered barriers over affected soil in Boom Landing, treating on-site groundwater, monitoring sediment, and placing

institutional controls such as signs and fencing to manage potential risks associated with soil, groundwater, soil gas, and sediment. **Cost: \$6.9 million.**

Alternative 3 Recommended option – This alternative involves the same activities as Alternative 2. Alternative 3 also includes removing accessible contaminated material at the wastewater treatment plant. **Cost: \$7.6 million.**

EPA proposes Alternative 3 because it best meets the evaluation criteria among all the alternatives and protects human health and the environment. This alternative also meets federal and state requirements and will be effective in the long term. The table below provides a comparison of the alternatives.

Full details about the proposed option and the other options considered are in the technical documents on file at Stephenson Public Library and in the administrative record on the EPA website: www.epa.gov/superfund/wpsc-marinette.

Chart comparing cleanup alternatives with the nine Superfund cleanup selection criteria

Evaluation Criteria	Alternative 1	Alternative 2	Alternative 3*
Overall Protectiveness of Human Health and the Environment	○	●	●
Compliance with Potential Applicable or Relevant and Appropriate Requirements (ARARs)	○	⊙	●
Long-Term Effectiveness and Permanence	○	●	●
Reduction of Toxicity, Mobility, and Volume Through Treatment	○	●	●
Short-Term Effectiveness	○	●	●
Implementability	NA	●	●
Costs	\$50,000	\$6.9 million	\$7.6 million
State Acceptance	To be determined		
Community Acceptance	To be determined		

* EPA's recommended alternative

NA = not applicable

● Fully meets criterion ⊙ Partially meets criterion ○ Does not meet criterion

Site background

The former MGP property, located at 1603 Ely St. in Marinette, encompasses about 4 acres and is currently owned by the city of Marinette and a company called 1428 Main Street Holdings.

The former manufactured gas facility was built in 1910 and operated through 1960. MGPs were industrial facilities that produced manufactured gas used for street lighting, heating, and cooking. Most MGPs stopped operating by the 1960s and were torn down. Typical MGPs included buildings, oil tanks and storage sheds.

In 1962, the former MGP property was sold to the city of Marinette. The city subsequently used the property to expand its wastewater treatment plant facilities. From the early 1960s to 1990, the treatment plant property was also used by the city to manufacture asphalt, and had a service garage and a gasoline tank.

Past cleanup actions

In 1989 during expansion of the treatment plant, more than 9,700 tons of contaminated soil from MGP activities were removed. In 2004, the city began another sewer expansion project requiring excavation of additional soil on the property. Approximately 1,030 tons of contaminated affected soil were excavated.

In 2007, a study was done to determine risk to human health and the environment. The study found contaminants in soil, groundwater, sediment and soil gas including chemicals and oily substances from past MGP operations.

Contaminated soil near Boom Landing and the treatment plant poses a risk for industrial and construction workers, and for recreational visitors. Groundwater at the site is not usable as drinking water because of the areas of contamination that were found. Because the city uses Green Bay as its drinking water source, groundwater at the MGP site will not be considered a potential future source of drinking water. Any future construction in the area will provide a risk to workers having direct contact with contaminated groundwater.

In 2012 and 2013, emergency cleanup activities were conducted in portions of the site along the Menominee River.

Nearly 15,000 tons of contaminated river sediment were removed near the MGP site. Because of this action, current conditions in sediment are not considered to pose a risk to human health or the environment.

Several soil gas samples collected near Boom Landing and the treatment plant showed results within acceptable safety levels. Any risk to human health would be to construction workers during excavation activities.

Explanation of Evaluation Criteria

- 1. Overall protection of human health and the environment.** Examines whether an option protects both human health and the environment. This standard can be met by reducing or removing pollution or by reducing exposure to it.
- 2. Compliance with applicable or relevant and appropriate requirements (ARARs).** Ensures options comply with federal and state laws.
- 3. Long-term effectiveness and permanence.** Evaluates how well an option will work over the long term, including how safely remaining contamination can be managed.
- 4. Reduction of toxicity, mobility or volume through treatment.** Determines how well the option reduces the toxicity, movement and amount of pollution.
- 5. Short-term effectiveness.** Compares how quickly an option can help the situation and how much risk exists while the option is under construction.
- 6. Implementability.** Evaluates how feasible the option is and whether materials and services are available in the area.
- 7. Cost.** Includes not only buildings, equipment, materials and labor but also the cost of maintaining the option for the life of the cleanup.
- 8. State acceptance.** Determines whether the state environmental agency accepts the option. EPA evaluates this criterion after receiving public comments.
- 9. Community acceptance.** Considers the opinions of the public about the proposed cleanup plan. EPA evaluates this criterion after a public hearing and comment period.

EPA Proposes Cleanup Plan, Seeks Public Comments

Public comment period: July 17 - Aug. 16, 2017

Full details about the proposed options considered are on file at:

Stephenson Public Library
1700 Hall Ave.
Marinette, WI
Hours: 9 a.m. to 6 p.m.

Or on the EPA website: www.epa.gov/superfund/wp-sc-marinette.

**WPSC MARINETTE MANUFACTURED GAS PLANT:
EPA Proposes Cleanup Plan for Soil, Groundwater**

United States
Environmental Protection
Agency
Region 5
Superfund Division (SL-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3580



**WPSC Marinette MGP Site
Public Comment Sheet**

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Susan Pastor
EPA Community Involvement Coordinator
Superfund Division (SI-6J)
EPA Region 5
77 W. Jackson Blvd.
Chicago, Il 60604-3590

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