

Danelski, Denise D - DNR

From: Gielniewski, Margaret <gielniewski.margaret@epa.gov>
Sent: Thursday, August 3, 2017 11:17 AM
To: Dombrowski.Frank
Cc: DuFresne, Kristin I - DNR; Jennifer Knoepfle; Jennifer Hagen (jhagen@naturalrt.com); Gielniewski, Margaret
Subject: WPSC Marinette PP Alternatives Letter to WEC
Attachments: 20170803104957937.pdf

Hello Frank,

This letter clarifies why Alternative 2, as presented in the FS Revision 3, was excluded from the EPA's Proposed Plan.

Please keep for your records.

As a reminder, please submit any Proposed Plan comments to me no later than August 16, 2017.

Best regards,
Margaret



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

Mr. Frank Dombrowski
WEC Energy Group
Environmental Services Department
333 West Everett Street, A231
Milwaukee, WI 53203

Subject: Remedial Alternatives in the Proposed Plan (PP)
Former Marinette Manufactured Gas Plant (MGP) Site, Marinette, Wisconsin

Dear Mr. Dombrowski,

I am writing to clarify the United States Environmental Protection Agency's (EPA) position concerning the number of remedial alternatives we've presented in our July 17, 2017 Proposed Plan for the Wisconsin Public Service Corporation (WPSC) Former Marinette Manufactured Gas Plant (MGP) site in Marinette, Wisconsin. As you may know, WEC carried forth four remedial alternatives in the EPA-approved *Feasibility Study (FS) Report Revision 3, Wisconsin Public Service Corporation (WPSC) Former Marinette Manufactured Gas Plant (MGP) Site, Marinette, Wisconsin*, (June 26, 2017) (Natural Resource Technology, Inc.) for evaluation, yet EPA's Proposed Plan contains three alternatives for consideration.

The difference, quite simply, is that Alternative 2 in the FS would not achieve all remedial action objectives (RAOs) or comply with all Applicable or Relevant and Appropriate Requirements (ARARs), whereas the Proposed Plan should only present the baseline alternative (No Action) and those alternatives that do meet RAOs and comply with ARARs.

The site RAOs for remedial alternatives include the following:

- **RAO-1.** Prevent human exposure, including dermal contact and incidental ingestion of particulates and vapor, to NAPL-saturated soil and subsurface soil containing MGP-related contaminants above preliminary remediation goals (PRGs).
- **RAO-2.** Prevent human exposure including dermal contact, ingestion, and inhalation (as a result of vapor intrusion) of groundwater containing MGP residuals exceeding PRGs.
- **RAO-3.** Restore groundwater beyond the point of compliance to PRGs for MGP-related contaminants within a reasonable timeframe.
- **RAO-4.** Minimize, to the extent practicable, the potential for migration of groundwater with MGP-related constituents above the PRGs to surface water.

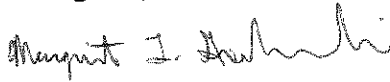
- **RAO-5.** Demonstrate that the reactive core mat remains effective at preventing NAPL from migrating into the Menominee River.

As presented in the FS, Alternative 2 would remove accessible MGP source material from Boom Landing and maintain existing pavement as a soil barrier and install a soil barrier where an existing barrier is not present in Boom Landing, and implement institutional controls including a Soil Management Plan, but it would not provide for installation and maintenance of a horizontal soil barrier in the WWTP Zone, although the area is heavily industrialized and access is physically restricted through perimeter fencing.

Upon review, EPA determined that Alternative 2 in the FS would not achieve RAO-1 in the WWTP Zone due to discontinuous detections of MGP contaminants in surficial soil at the WWTP Zone at concentrations that exceed PRGs. In addition, Alternative 2 does not meet chemical-specific ARARs because there are benzo(a)pyrene and other non-naphthalene PAH exceedances within the 0-2-foot soil interval at the WWTP Zone that exceed PRGs. Therefore, EPA excluded Alternative 2 as presented in the FS from the Proposed Plan, and thus renamed FS Alternative 3 as Alternative 2 in the Proposed Plan and FS Alternative 4 as Alternative 3.

If you have any questions, please do not hesitate to contact me at 312-886-6244 or at gielniewski.margaret@epa.gov.

Best regards,



Margaret T. Gielniewski
Remedial Project Manager

Electronic CC:
Wisconsin DNR
CH2M
NRT