

**From:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Sent:** Friday, April 05, 2019 3:03 PM  
**To:** Dombrowski, Frank J  
**Cc:** Knoepfle, Jennifer/CHC; Jennifer Hagen; marcus.byker@obg.com; McKnight, Kevin - DNR  
**Subject:** Marinette PDI WP PTW Definition  
**Attachments:** 20190405143951744.pdf

Hello Frank,

Please find EPA's response to PTW inquiries brought about by PDI comments.

Let me know if you have any questions.

Best regards,  
Margaret

Margaret Gielniewski, Acting Chief  
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Mr. Frank Dombrowski  
WEC Energy Group – Business Services  
Environmental Dept. - Land Quality Group  
333 W. Everett St., A231  
Milwaukee, WI 53203

April 5, 2019

Subject: Clarification to EPA's Comments on the *Preliminary Design Investigation Work Plan – Revision 0, Marinette Former Manufactured Gas Plant Site, Wisconsin Public Service Corporation, Marinette, Wisconsin*

Dear Mr. Dombrowski,

EPA and Wisconsin DNR reviewed the *Preliminary Design Investigation (PDI) Work Plan, Revision 0, Marinette Former Manufactured Gas Plant (MGP) Site, Wisconsin Public Service Corporation, Marinette, Wisconsin*, dated September 4, 2018, prepared by O'Brien & Gere Engineers, Inc., on behalf of Wisconsin Energy Corporation.

The Agencies have the following clarifications to previously submitted comments regarding principal threat wastes (PTWs).

EPA concluded that elevated concentrations of PAHs can be considered PTWs because they are highly toxic (e.g. several orders of magnitude above levels that allow for unrestricted use and unlimited exposure). There is not a specific threshold at which a contaminant is considered a PTW, and part of the definition in the Federal Register, which is not discussed in EPA's guidance (<https://semspub.epa.gov/work/HQ/175390.pdf>) is based on unrestricted use. Site remediation is based on industrial use and PAHs at 10x the industrial soil residual contaminant levels (RCLs) will be considered PTWs.

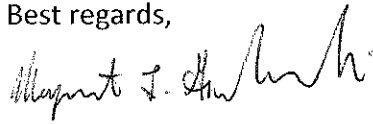
EPA acknowledges that there are implementation factors that weigh in on how we approach elevated concentrations of PAHs and NAPL (both PTWs). However, EPA's intent in the 2017 ROD is to remove NAPL and elevated concentrations of PAHs to the extent practicable. Proprietary controls can supplement treatment of waste. Please see an excerpt from the March 8, 1990 NCP below.

*Along with the program goal, EPA is establishing expectations regarding the extent to which treatment is likely to be practicable for certain types of site situations and problems frequently encountered by the Superfund program. These expectations indicate that EPA intends to place priority on treating materials that pose the principal threats at a given site. The expectations also acknowledge that certain technological, economic and implementation factors may make treatment impracticable for certain types of site problems.*

*Experience has shown that in such situations, remedies that rely on control of exposure through engineering and/or institutional controls to provide protection generally will be appropriate.*

If you have any questions, don't hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read "Margaret J. Gielniewski". The signature is fluid and cursive, with a prominent initial "M" and "G".

Margaret Gielniewski, Remedial Project Manager  
U.S. EPA Superfund Division

Electronic CC:  
Wisconsin DNR  
CH2M  
OBG