

From: Gielniewski, Margaret <gielniewski.margaret@epa.gov>
Sent: Thursday, February 20, 2020 4:34 PM
To: Dombrowski, Frank J
Cc: Krueger, Sarah E - DNR; Fitzpatrick, William - DNR; Marcus Byker (Marcus.Byker@ramboll.com); Korpela, Adrienne/MKE; Gielniewski, Margaret
Subject: WPSC Marinette MGP Conditional Approval of the Remedial PDI WP Rev/ 1
Attachments: WPSC.Marinette.PDIWP.Conditional.Approval 02.20.2020.pdf

Hello Frank,

EPA and WDNR reviewed the Remedial PDI WP Rev. 1 for the WPSC Marinette MGP Site.

There are five remaining issues that prevent total approval of Rev. 1.; hence the conditional approval status.

Please note how you plan to address these issues and please address them in the field while collecting the data.

If you would like to have a call for clarification, do not hesitate to contact me.

Best regards,
Margaret

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Reply to attention of: SR-6J

ELECTRONIC SUBMITTAL ONLY

Mr. Frank Dombrowski
WEC Energy Group—Business Services

February 20, 2020

Subject: Conditional Approval of the *Preliminary (Remedial) Design Investigation Work Plan* for the Wisconsin Public Service Corporation (WPSC) Marinette Manufactured Gas Plant (MGP) Site, Marinette, Wisconsin dated January 16, 2020.

Dear Mr. Dombrowski,

The U.S. Environmental Protection Agency (EPA), with assistance from the Wisconsin Department of Natural Resources (WDNR) has reviewed the Marinette *Preliminary (Remedial) Design Investigation Work Plan* (PDI WP) Rev. 1 dated January 16, 2020. The agencies identified some issues that must be addressed prior to or during the course of the PDI sampling event, listed below:

1. Pages 15-16, Section 2.3 Key Term 3: MGP Source Material—The work plan states that the extent of “intrusive remedial action” will be defined by samples, visually selected, that have risks greater than 10^{-3} or a noncancer hazard index risk greater than 10. Visual selection (only) of samples for determining MGP source material is not acceptable. Higher risk material should be defined with a strategy of sampling and laboratory analysis appropriate for defining the degree and extent of the material for proper risk-management decision-making. Confirm that laboratory analysis will occur in samples where no NAPL is observed to confirm the levels of PAHs present in those samples.
2. A) Page 22, Section 4.3.1.1: The work plan proposes to resample locations where oil-coated/oil-wetted soils were observed in past sampling events as shown by the yellow dots in Figure 4. The plan also proposes to use additional samples to delineate the horizontal boundaries of source areas with additional borings, as shown by the red dots in Figure 4. The yellow dots do not bound all the areas with previous observations of oil-coated/oil-wetted soils, especially in the northern source-removal area. Additional bounding borings are needed to accomplish this work. Notify the Agencies of the location of these additional borings to limit data gaps.

B) This section also proposes to use the presence of buildings and structures to define the boundary of the source area if the presence of the building or structure prevents additional borings. It is possible that the source areas may extent beneath and beyond the buildings and structures identified in source areas. The work plan should provide a means for assessing the potential that source areas may occur beyond the building/structures proposed for bounding the source area. The Agencies propose sampling multiple and/or all sides of the building/structures to confirm that migration of material hasn't occurred.

3. A) Page 23, Section 4.3.1.2: The work plan proposes to use visual NAPL observation to define the horizontal and vertical boundary of the source areas. The source areas should be defined as soils containing NAPL and high (10^{-3}) levels of PAHs as determined by laboratory analysis from samples that accurately bound the source areas. Further delineation of PAHs (to 10^{-6}) is needed to determine the extent of the remediation.
B) This section also proposes subsurface soil sampling from a "random two-foot interval of water-saturated material" if there is no visual "observation of potential MGP residuals." Subsurface soil is considered soil below the first two-feet (for EPA; four-feet for Wisconsin DNR), which may, or may not, be saturated. This section should be revised to indicate a random sample will be collected from greater than two-feet below ground surface and water saturation should be omitted as a criterion.
4. Page 25, Section 4.4.2.1: Incremental sampling is not allowed under Wisconsin Spill Law; therefore, it is not compliant with the Site ARARs. Wisconsin Spill response requires discrete sampling for defining soil contaminant levels and for comparison to soil criteria. Compositing of soil for assessing risk is not allowed under promulgated state regulations. Proceed with discrete sampling only.
5. Page 26, Section 4.4.2.3 4th paragraph: The work plan states that the top two-feet of soil will be hand cored for incremental sampling to assess risk. Per Wisconsin ARARs (above), incremental sampling is not allowed. Proceed with discrete sampling only.

Please do not hesitate to contact me if you have any questions regarding these comments, so we can come to a resolution and begin the PDI sampling as soon as possible.

Best regards,



Margaret Gielniewski
Remedial Project Manager

ecc: Sarah Krueger, WDNR
Bill Fitzpatrick, WDNR
Marcus Byker, Ramboll
Adrienne Korpela, Jacobs