

**From:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Sent:** Friday, February 21, 2020 1:12 PM  
**To:** Dombrowski, Frank J  
**Cc:** Adler, Kevin; Felitti, Peter; Prasad, Narendra M; Fassbender, Judy L - DNR; Krueger, Sarah E - DNR; Fitzpatrick, William - DNR; Marcus Byker (Marcus.Byker@ramboll.com); Korpela, Adrienne/MKE; Gielniewski, Margaret  
**Subject:** WPSC Marinette MGP PTW Definition Clarification Letter  
**Attachments:** WPSC.Marinette.PTW.Letter.02.21.2020.pdf

Hello Frank,

Please find the WPSC Marinette MGP principal threat waste definition clarification letter, attached.

Please note, this is by electronic submittal only and a paper copy will not be forthcoming in the mail.

I will send this (electronically) to the EPA record's center immediately to add to the site's administrative record.

Let me know if you have any questions or concerns.

Best regards,  
Margaret

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ELECTRONIC SUBMITTAL ONLY

February 21, 2020

Mr. Frank Dombrowski  
WEC Energy Group—Business Services  
333 Everett Street - A231  
Milwaukee, WI 53203 USA

Subject: Clarification of Elevated Levels of Polycyclic Aromatic Hydrocarbons (PAHs) as Principal Threat Waste (PTW) at the WPSC Marinette Manufactured Gas Plant (MGP) Site, Marinette, Wisconsin

Dear Mr. Dombrowski,

Thank you for participating in the teleconference held by representatives of the United States Environmental Protection Agency (EPA), Wisconsin Department of Natural Resources (WDNR), and Wisconsin Public Service Corporation (WPSC) that EPA held on February 19, 2020 to clarify the levels of PAHs that constitute PTW at the WPSC Marinette MGP site. I am writing to confirm the conclusions we made during the call.

As you may know, data gathered during the remedial investigation demonstrate that non-aqueous phase liquid (NAPL) and elevated levels of PAHs are the primary contaminants of concern in the soil at the WPSC Marinette MGP site. In 2017, EPA issued a Record of Decision (ROD) for the site wherein we designated the NAPL and certain levels of PAHs as PTW:

*"The principal threat waste at the WPSC Marinette MGP Site is PAH- and NAPL-contaminated soil because the toxicity of the material poses a potential [estimated lifetime cancer] risk of  $10^{-3}$  or greater and contributes to groundwater contamination, as defined in **A Guide to Principal Threat and Low-Level Threat Wastes**, Office of Solid Waste and Emergency Response 9380.3-06FS, November 1991." (2017 ROD, Section 1, paragraph E under **Statutory Determinations**.)*

The participants on the teleconference agreed that NAPL is a PTW at the WPSC Marinette MGP site. However, in my April 5, 2019 letter to WPSC concerning the *Clarification to EPA's Comments on the Preliminary Design Investigation Work Plan—Revision 0 for the [Marinette MGP] Site*, I had inadvertently presented a second, incongruent definition of "elevated levels of PAHs" as PTW by stating that:

*"...site remediation is based on industrial use and PAHs at 10x the industrial soil residual contaminant levels (RCLs) will be considered PTWs." (April 5 letter, third paragraph.)*

Because it is inferred that "10x the industrial RCLs" is a  $10^{-5}$  risk level with a hazard index (HI) of 1, my April 5 letter seemingly redefined elevated levels of PAHs at the  $10^{-5}$  risk level point of departure as being PTW at the site.

With this letter, I am further clarifying that my April 5 letter intended to underscore that the intention of the 2017 ROD is to remediate PAHs at the site to industrial levels at or below the  $10^{-6}$  risk range and not to redefine the levels of PAHs that are PTW. This position has not changed. Also, the 2017 ROD defined elevated levels of PAHs as being PTW at concentrations at that resulted in a  $10^{-3}$  risk level or with a HI of 10 or more and this position is not changed.

I apologize for the confusion and I look forward to the remediation of the site.

Please do not hesitate to contact me if you have any questions.

Best regards,



Margaret Gielniewski  
Remedial Project Manager

Ecc: Naren Prasad, WPSC  
Peter Felitti, EPA  
Kevin Adler, EPA  
Judy Fassbender, WDNR  
Sarah Krueger, WDNR  
Bill Fitzpatrick, WDNR  
Marcus Byker, Ramboll  
Adrienne Korpela, Jacobs