

DATE: August 8, 2022 FILE REF: 02-38-000047

TO: Margaret Gielniewski, US EPA Region 5

FROM: Sarah Krueger, WDNR Remediation and Redevelopment

SUBJECT: Review of Focused Feasibility Study Rev 0 and Pre-Design Investigation Evaluation Report, WPS Marinette MGP (former) dated July 8, 2022

1. General comment: Please note that a cover is required in Wisconsin for direct contact residual contaminant level exceedances from 0 to 4 feet for protection of human health. Please keep this in mind when developing the cover maintenance area and plan as part of any future institutional controls.
2. WWTP North Source Area - Alternative 2: Please note that if ISGS were to become the preferred alternative, the potential for future mechanical disturbance to compromise the crust makes the alternative unlikely to be accepted by the state. The alternative would not be considered protective in the long term, based on the utilities in the area which will likely require future maintenance and mechanical disturbance of the ISGS areas.
3. WWTP North Source Area - Alternative 3: Please note that if bio-oxidation were to become the preferred alternative, the PDI results indicating low concentrations of petroleum degrading bacteria at the site makes the alternative unlikely to be accepted by the state. It is unclear how adding oxygen to the environment and increasing the metabolic rates of the existing low concentrations of microorganisms will effectively treat the MGP residuals, source material.
4. The ISS alternatives in both WWTP, Alternative 4, and Boom Landing, Alternative 2, are preferred, because ISS is likely to be effective in the long term, it has been implemented at other sites in the state where the long-term effectiveness has been demonstrated, the Alternatives meet state ARARs, and would likely receive state acceptance.
5. The WWTP Alternative 5 and Boom Landing Alternative 3, excavation of source material, are also preferred, because they are likely to be effective even considering limitations with excavation around buildings, railway, and utilities. Excavation was previously approved and memorialized in the Record of Decision as the chosen alternative to address upland source areas and will likely receive state acceptance.