

From: Krueger, Sarah E - DNR
Sent: Friday, February 17, 2023 3:07 PM
To: gielniewski.margaret@epa.gov
Cc: Endsley, Erin A - DNR
Subject: DNR Comments on WPSC Marinette MGP - Focused Feasibility Study Revision 1

Margaret –

Thank you for the opportunity to provide comment on the FFS Rev. 1 for the Marinette MGP site. DNR has no additional comments on the FFS, but has concerns that there is not a RAO for soil that addresses minimizing current and future migration from soil to groundwater.

Past comments on the Alternatives Array did ask that as part of the FFS inclusion of treatment options for dissolved phase product and/or product found in groundwater. These treatment options have been included as part of the FFS alternatives. DNR understands that the addition of a RAO at this time would be difficult since it has not been communicated previously as part of DNR or EPA comments. However, if treatment of dissolved phase product and/or product found in groundwater is included in the RA inclusion of a RAO similar to RAO2 (Minimize current and future migration of COCs from soil to groundwater) and RAO3 (Stabilize or reduce the migration of COCs into groundwater by conducting source control measures) from the Manitowoc MGP site may be appropriate.

Please reach out with any questions you have.

Thank you,
Sarah

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Sarah Krueger, P.G.

Contaminated Sediment Specialist
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 510-8277
Sarah.Krueger@wisconsin.gov



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