

From: [Gielniewski, Margaret \(she/her/hers\)](#)
To: [Dombrowski, Frank J](#)
Cc: [Marcus Byker \(Marcus.Byker@ramboll.com\)](#); [Krueger, Sarah E - DNR](#); [Korpela, Adrienne/MKE](#)
Subject: Marinette FFS Rev. 1 Comments in Word
Date: Thursday, March 2, 2023 10:44:46 AM
Attachments: [Marinette.FFSRev1.CommentLetter.03.02.2023.docx](#)

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Hi Frank,

Currently, 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. The Agencies understand 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.

We look forward to the discussion next week.

Thank you for your assistance in scheduling that meeting!

Kind regards,
Margaret

Margaret Gielniewski, RPM
Region 5, Chicago
312-886-6244



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Mr. Frank Dombrowski
WEC Energy Group – Business Services
Environmental Dept. - Land Quality Group
For electronic submittal only

March 2, 2023

Subject: Review of the *Focused Feasibility Study Rev. 1, WPS Marinette MGP (former)* dated July 8, 2022.

Dear Mr. Dombrowski,

EPA and Wisconsin DNR reviewed the *Focused Feasibility Study Revision 1, Former Marinette Manufactured Gas Plant Site, Marinette, Wisconsin, Wisconsin Public Service Corporation* dated January 13, 2023, prepared by Ramboll on behalf of Wisconsin Public Service Corporation (WPSC) and the letter, *Submittal of Focused Feasibility Study (FFS) – Revision 1 and Response to USEPA’s August 16, 2022 and October 25, 2022 Comments on the Focused Feasibility Study Revision 1*.

The response to comments letter was evaluated to assess if the responses satisfactorily addressed review comments submitted by EPA to WPSC, and whether text revisions were appropriately incorporated into the revised FFS report.

Comments not addressed satisfactorily: RTC 27 (h), 2, 12, 2152, 58, and 88. Comments on the WPSC responses are provided in tabular format as Table 1.

Additional Comments: Upon review of the changes identified in the FFS Revision 1 report text, five additional comments were prepared. These comments, numbers 107 through 111, are provided in tabular format in Table 2.

Thank you for the opportunity to comment.

Kind regards,

Margaret Gielniewski

Ecc: Sarah Krueger, Wisconsin DNR
Adrienne Korpela, Jacobs
Marcus Byker, Ramboll

Table 1. Comments on the Response to Comments Letter

Comment No.	Section	Page	Paragraph/ Bullet	Comment	WPCS Response to Comment
<i>Comments on the RTC Letter</i>					
RTC 27	-	-	-	Please include the following ARARs: h. RCRA 40 CFR 264 – 265: Wastewater treatment standards, waste storage, excavation, and fugitive dust. The FS needs to be clear on which site wastes are to be managed as hazardous vs non-hazardous, and which subparts of 264 and 265 apply (e.g., containers). The row for 40 CFR 264 and 265 should not indicate "Wastewater Discharges to POTW" as the media. The "Requirements" column should be revised to accurately describe these items and delete the phrase regarding discharge to a POTW or provide the specific citation.	The requested changes have been made to Table 1. The response to (h) needs to be revised to more specifically describe the triggers for 40 CFR 264 and 40 CFR 265. Also, the corollary WI regulations need to be added to Wisconsin Action-Specific. Explain that onsite treatment of wastewater which is discharged through a sewer system to a POTW, will be subject to a WPDES permit and therefore not subject to RCRA. RCRA Hazardous wastewater that is not subject to the MGP exemption and will be treated onsite prior to being hauled offsite, and if the site is an LQG, will be subject to 40 CFR 264 if the waste is onsite more than 90 days, or subject to 40 CFR 265 if the waste leaves the site in less than 90 days. Federal ARARs include 40 CFR 262 however, Wisconsin has RCRA authorization, therefore, also include WI Chapter NR 662 Hazardous Waste Generator Standards to Soil Action-Specific ARARs, Wisconsin. Suggest omitting "Action-Specific" from the title "All Media Action-Specific ARARs" (Table 1, page 5/6), as the 1st row states "Chemical Specific."
<i>Comments on the FFS Revision 0</i>					

Table 1. Comments on the Response to Comments Letter

Comment No.	Section	Page	Paragraph/Bullet	Comment	WPCS Response to Comment	
2	Section 2.2 and elsewhere	12/82	1st Para. 1st bullet	Include NR 815 Underground Injection as an Applicable ARAR. The FFS does warrant changes to the ARARs. See specific comments.	NR 815 has been added as a soil action-specific ARAR. NR8 815 was previously included under the groundwater action-specific ARARs.	The comment did not intend to request adding the UIC citation to soil (however, that is acceptable). The citation was incorrect and is still incorrect. WAC NR 815.09 and 815.10 is the correct citation (Wis Stat. 815.09 Execution against debtor's person and 815.10 Execution against body only remedy, exceptions are both incorrect for this site). Please update the citation.
12	5.1.2.3	28/82	-	WDNR uses the term "continuing obligations" instead of "institutional controls." Revise for consistency and provide more details in the document regarding the specific continuing obligations that will be required for each media as part of each alternative, including soil gas and groundwater. Discuss how the continuing obligations will be implemented and what controls/limitations will be necessary. Beyond the GIS registry/database and some plans, the text is limited in detail.	Institutional controls is the typical USEPA term and the term used in the Multi-Site Feasibility Study documents. Section 5.1.2.3 has been updated to note that in Wisconsin, WDNR uses the term continuing obligations to be used in the remainder of the document. Section 5.1.2.3 also notes that continuing obligations will be implemented holistically with other site media, as required in the ROD. Additionally, the specific continuing obligations required by media do not vary significantly between alternatives.	Section 6.4, page 70/86, Table G: Under Alternative 2, Magnitude of Residual Risk, revise "ICs" to COs.

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Comment No.	Section	Page	Paragraph/ Bullet	Comment	WPCS Response to Comment	
21	5.1.3.1	31/82	Para.1-3	The text description of bio-oxidation is unclear and imprecise. The text seems to suggest that the goal of the alternative is to create aerobic conditions in the groundwater, so that dissolved constituents from the NAPL are degraded before they can migrate away. This technology would be more clearly called something like "saturated zone bioremediation" or biosparging to avoid confusing with in-situ oxidation and much higher oxidative energies. If this alternative is retained in the text, revise for clarity to use more precise terms and state what the alternative is attempting to accomplish.	Use of the term "sparge" implies primarily physical treatment (volatilization) which is not the primary intent of this application. Available literature including multiple USEPA guidance documents utilizes the term "bioremediation" or "aerobic bioremediation". Based on available literature, WPCS proposes to use the term "aerobic bioremediation" in FFS.	Section 5.4.3.1, page 48/86, 2 nd paragraph: Revise the term "bio-oxidized."
52	5.4.3.2	47/83	1st Para.	The text states "active measures will be taken to reduce accessible source material via bio-oxidation and restore groundwater to RGs, passive DNAPL recovery, and use of a PRB." Is a PRB proposed with this alternative? If not, please correct the text.	Text has been revised to indicate that focused long-term operation of the bio-oxidation system could serve as a PRB, as necessary to achieve RAOs.	The added text is confusing considering that a PRB was added to this alternative that "will be implemented consistent with the description of the PRB provided in Section 5.1.2.4 associated with ISGS WWTP North Source Area." Delete or revise the sentence "Furthermore, the upgradient portion of the aerobic bioremediation system could be operated for an extended time period to act as a PRB should field conditions warrant."

Table 1. Comments on the Response to Comments Letter

Comment No.	Section	Page	Paragraph/ Bullet	Comment	WPCS Response to Comment	
58	5.4.4.1	49/82	2nd Para.	The text states that the groundwater RAOs will be achieved, and that groundwater will be treated within the drainage vent to achieve the RGs. However, what about utility corridors where ISS will not be implemented and where the PRB does not intersect? The text should be revised accordingly if the vent and PRB remain in the current configuration. This comment applies to other evaluation criteria as well, such as long-term effectiveness and permanence.	Section 5.4.4.1 has been to clarify that the PRB upgradient of the WWTP North Zone will prevent recontamination of WWTP North Zone and the PRB upgradient of Boom Landing will manage address inaccessible groundwater impacts.	The text states, “Alternative 4 will stabilize source material from the WWTP North Source Area which will improve groundwater quality emanating from the inaccessible source area preventing recontamination of the WWTP North Source Area to address RAO-2 through RAO-4.” This sentence is confusing and seems to imply that stabilization of the WWTP North Source Area will prevent recontamination of the WWTP North Source Area. Delete the portion of the sentence beginning with “which will improve groundwater quality...”

Table 1. Comments on the Response to Comments Letter

Comment No.	Section	Page	Paragraph/ Bullet	Comment	WPCS Response to Comment
88	Table 7	1/1	--	Comments from the detailed and comparative evaluations should be considered in updating this table.	<p>Table 7 has been updated, where necessary, to be consistent with refined comparative analysis text in Section 6.</p> <p>The score descriptors in Table 7 are inconsistent with the numerical values in Tables U, V, and W given the provided scoring key of: 1-low, 2-low-moderate, 3-moderate, 4-moderate-high, 5-high. For example, the short-term effectiveness of WWTP North Alternative 1 is listed as “High”, but scores 3.7 on Table U, under this criterion it should be listed as “Moderate to Moderate-High” to be consistent within Table 7. The Reduction of Toxicity, Mobility, or Volume Through Treatment for Boom Landing Alternative 3 is listed as “Moderate to Moderate-High” but this criterion scores as 3.0 on Table V, therefore, it should be listed as “Moderate” in Table 7. There are many examples of these inconsistencies in Table 7. Either revise the text descriptors in Table 7 to be consistent with the numeric values of Tables U, V, and W, or replace the text descriptors with the numeric values and add the scoring key.</p>

Table 2. Comments on the FFS Revision 1

Comment No.	Section	Page	Paragraph/ Bullet	Comment
107	Section 5.2.2.1	40/86	last Para.	The following text was added to this version of the FFS: "Current PAHs are largely less than RGs at current conditions and it is reasonable to expect that concentrations will be comparable, if not reduced following application of ISS." Delete the second clause of the sentence, starting with "and it is reasonable..."
108	Section 5.4.2.1 and 5.4.3.1	44/86 48/86	-	Delete the added sentence "Further, groundwater is currently not negatively affecting the environmental as groundwater impacts attenuate prior to reaching the Menominee River."
109	Section 5.4.4.1	51/86	2nd Para.	The first sentence references Alternative 3. Presumably, this should be Alternative 4. If so, please correct the typo for clarity of the text.
110	Sections 5.4.5.2, 5.4.5.3, 5.5.3.2, 5.5.3.3	54/86 60/86	-	Section 5.4.5.2 indicates that groundwater will be restored to RGs using a PRB, whereas Section 5.4.5.3 indicates that MNA will be relied on to fully restore groundwater to RGs. Revise the text for consistency. Note that reliance on MNA to meet the RGs will require demonstrating that MNA is occurring. Additionally, there is some concern relying on the PRB for Alternative 5 since it is not continuous due to the utilities. The utility bedding, if high-conductivity material was used, could act as preferential flow pathways for groundwater contamination. There are also text inconsistencies related to the restoration of groundwater to RGs in Sections 5.5.3.2 and 5.5.3.3.
111	Table 5	1 of 1	Alternative 5	Horizontal engineered surface barrier is indicated in Table 5 for Alternative 5 but is not shown on Figure 8. Please revise the table or figure for consistency.