



August 16, 2017

Ms. Susan Pastor
Community Involvement Coordinator
U.S. EPA
Mail Code SI-6J
77 West Jackson Boulevard
Chicago, IL 60604

SUBJECT: Wisconsin Department of Natural Resources Remediation and Redevelopment Program Comments Regarding Proposed Plan for Cleanup Wisconsin Public Service Corporation Marinette Former Manufactured Gas Plant Superfund Alternative Site Marinette, Wisconsin

Dear Ms. Pastor:

The Department of Natural Resources Remediation and Redevelopment Program (DNR) has reviewed the United States Environmental Protection Agency (U.S. EPA) document titled *Proposed Plan for Cleanup Wisconsin Public Service Corporation Marinette Former Manufactured Gas Plant Superfund Alternative Site Marinette, Wisconsin* (Proposed Plan) and this correspondence for inclusion to the administrative record. The DNR offers the following comments:

Comment Number 1 – Media of Concern

Paragraph 6 on page 7 of the Proposed Plan indicates the media of concern at the site are soil and groundwater. The DNR considers sediment to also be a media of concern.

Comment Number 2 – Soil Remediation Goals

Table 1 on page 15 of the Proposed Plan makes reference to DNR document RR-890 (a.k.a. *Soil Residual Contaminant Level Determinations Using the U.S. EPA Regional Screening Levels Web Calculator, PUB-RR-890, January 23, 2014*) and the *RCL Spreadsheet*. It should be noted that the referenced DNR RCL Spreadsheet has recently been updated and the industrial soil remediation goals outlined in Table 1 of the Proposed Plan are no longer current.

The DNR will continue to evaluate the Wisconsin Public Service Corporation Marinette Former Manufactured Gas Plant Superfund Alternative Site Marinette, Wisconsin based on the most current soil standards using Wis. Adm. Code ch. NR 720, DNR document PUB-RR-890 and the RCL Spreadsheet.

Comment Number 3 – Groundwater Remediation Goals

The last paragraph on page 15 of the Proposed Plan indicates the remediation goals for groundwater will be the more conservative of Wisconsin NR 140 Groundwater Enforcement Standard (NR 140) or the National Primary Drinking Water Regulations Maximum Contaminant Level as presented in the Multi-Site Risk Assessment Framework Addendum Revision 3. As documented in prior correspondence, the DNR will continue to consider the NR 140 enforcement standards and preventive action limits when evaluating groundwater analytical data.

Comment Number 4 – Remedial Alternatives 2 and 3

If residual soil contamination, above remediation goals, remains post excavation at a depth of 0 – 4' below ground surface the following will be required: cap(s), institutional controls, continuing obligations, a soil cover monitoring and maintenance plan and a soil management plan.

Comment Number 5 – Remedial Alternatives 2 and 3

Alternatives 2 and 3 within the Proposed Plan specify the long-term monitoring program will include visual inspections of the reactive core mat (RCM) and sediment sampling. It is unclear whether additional sampling of the residual sand cover will be completed. The DNR, in prior correspondence, recommended continued monitoring of the residual sand cover as part of the 5-year review process. Please clarify whether or not monitoring of the residual sand cover will be included in the 5-year review process or as part of a separate long-term monitoring plan.

Comment Number 6 – Remedial Alternatives 2 and 3

Alternatives 2 and 3 within the Proposed Plan specify effectiveness monitoring of the sediment RCM and institutional controls to manage potential risks associated with soil, groundwater, soil gas and sediment.

The DNR supports future effectiveness monitoring of the sediment RCM. The DNR also considers the RCM to be an engineering control. Per Wis. Stats. § 292.01(3m), "engineering control" means an object or action designed and implemented to contain contamination or to minimize the spread of contamination, including a cap, soil cover, or in-place stabilization, but not including a sediment cover.

Further clarification is needed with respect to sediment and what is meant by "institutional controls" and "specific restrictions to be included on the Wisconsin DNR GIS Registry" for this media. The agencies will need to categorize, per Wis. Stats. § 292.01 definitions, the residual sand cover as an engineering control, defined above, or a sediment cover. Wis. Stats. § 292.01(17m), defines "sediment cover" as a layer of uncontaminated sand or similar material that is deposited on top of contaminated sediment. This categorization will then be used by the agencies to determine the institutional controls, continuing obligations and specific restrictions to be included on the Wisconsin DNR GIS Registry for sediment.

The DNR appreciates the opportunity to provide U.S. EPA with comments. Please feel free to contact Kristin DuFresne via phone at 920-662-5443 or email at Kristin.DuFresne@Wisconsin.gov if you have any questions or if you require additional information.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program



Kristin DuFresne
Hydrogeologist
Remediation & Redevelopment Program

cc: Margaret Gielniewski, U.S. EPA Region 5
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WPS Marinette MGP – Alt SF (BRRTS # 02-38-000047) Case File