



October 5, 2017

Margaret M. Guerriero
Acting Director
Superfund Division
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Subject: Concurrence with the Record of Decision for Wisconsin Public Service Corporation
Marinette, Former Manufactured Gas Plant Site, City of Marinette, Marinette County,
Wisconsin

Dear Ms. Guerriero:

Margaret

The Department of Natural Resources (DNR) is providing you with this letter to document our concurrence with the remedy for the Wisconsin Public Service Corporation Marinette, Former Manufactured Gas Plant site as outlined in the Record of Decision for the site. The remedy, as outlined in the Record of Decision includes:

- 1. Excavation and off-site disposal of accessible source material located within the Boom Landing Zone**
 - a. Complete predesign investigation to further define horizontal and vertical extent of excavation and provide waste characterization sampling.
 - b. Obtain access agreements and demolish/remove parking lot, fish house, utilities, and existing concrete and asphalt pavements in the Boom Landing Zone.
 - c. Install temporary shoring to support deeper excavations.
 - d. Install a temporary dewatering system to lower the water table within the excavation footprint.
 - e. Excavate non-affected overburden soil and stockpile on-site for use as post-excavation backfill.
 - f. Excavate MGP-source material and transport to Subtitle D Landfill.
 - g. Backfill excavation to surrounding grades with granular backfill and stockpiled overburden material.
 - h. Restore Site to previous conditions.

- 2. Excavation and off-site disposal of accessible source material located within the Waste Water Treatment Plant (WWTP) Zone**
 - a. Complete predesign investigation and waste characterization sampling to further define horizontal and vertical extent of excavation and define areas requiring horizontal engineered barriers.
 - b. Obtain access agreement from the City of Marinette (City).
 - c. Install temporary shoring to support deeper excavations.
 - d. Install a temporary dewatering system to lower the water table within the excavation footprint.

- e. Excavate non-affected overburden soil and stockpile on-site for use as post-excavation backfill.
- f. Excavate MGP-source material and transport to Subtitle D Landfill.
- g. Backfill excavation to surrounding grades with granular backfill and stockpiled overburden material.
- h. Restore Site to previous conditions.

3. *Horizontal Engineered Surface Barriers at Boom Landing and WWTP Zones*

- a. Monitor and maintain existing engineered surface barriers including paved parking lots and paved roadways.
- b. Assess and mitigate potential exposure to surficial soil containing contaminants of concern (COCs) above PRGs by backfilling the two feet depth of excavated areas with 18 inches of clean fill and six inches of clean topsoil. Alternative barrier approaches, including gravel and/or asphalt, will be evaluated during the remedial design (RD) phase.

4. *In-situ Groundwater Treatment*

- a. Perform bench-scale testing of Site soils and groundwater with varying types and percentages of reagents to determine the most effective approach to address COCs in groundwater.
- b. One-time placement of oxidant into the exposed saturated zone resulting from excavation of Boom Landing and WWTP Zones.
- c. Groundwater monitoring until groundwater PRGs are achieved.

5. *Sediment Monitoring*

- a. Regular effectiveness monitoring of the Reactive Core Mat (RCM) to check for ebullition or migration of MGP source materials that were not addressed during the 2012 removal action.
- b. Monitor the 160 cubic yards (CY) of dredge inventory that remained after the NTCRA to ensure at least six inches of clean sand remain over those areas with MGP-residuals remaining, and that the 0 - 6-inch zone remains below remedial action levels (RALs).

6. *Institutional Controls (ICs) for Soil, Soil Gas, Groundwater, and Sediment*

- a. Boundaries for Continuing Obligations will be based on delineation of MGP COCs on affected parcels to PRGs. Wisconsin DNR's database will be used to implement continuing obligations per Wis. Stat. § 292.12. Requirements, limitations, or conditions relating to restrictions of sites listed on the Wisconsin DNR database are required to be met by all property owners [Wis. Stat. § 292.12(5)] for all contamination except sediment. Sediment engineering controls are the responsibility of the responsible party Wis. Stat. § 292.12(5m). As a result, the statute requires that the continuing obligations be maintained for a property, regardless of changes in ownership. A violation of Section 292.12 is enforceable under Wis. Stat. §§ 292.93 and 292.99.

The DNR concurs with the remedy, as described above and in the Record of Decision.

We understand that our staff will continue to work in close consultation with your staff during the implementation of the remedy.

Thank you for your cooperation in addressing the contamination at the Wisconsin Public Service Corporation Marinette, Former Manufactured Gas Plant site. Should you have any questions regarding this matter, please contact Kristin DuFresne, our Project Manager for the site at 920-662-5443.

Sincerely,



Darsi J. Foss, Director
Bureau for Remediation and Redevelopment

cc: Kristin DuFresne – DNR
Margaret Gielniewski - U.S. EPA
WPSC Marinette MGP (ALT SF) Case File