



October 1, 2012

Pablo Valentin  
US EPA Region 5 SR-6J  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590

Dear Mr. Valentin:

Subject: Concurrence with the Record of Decision for WPSC Campmarina Former MGP Site River Operable Unit, FID #460134950, BRRTS #0260000095.

This letter is provided by the Wisconsin Department of Natural Resources (WDNR) to document the State's concurrence with the September 2012 Record of Decision for the WPSC Campmarina Former Manufactured Gas Plant (MGP) River Operable Unit Superfund Equivalent Site. The WDNR believes that the ROD is consistent with the requirements of Wisconsin statutes and administrative rules.

The selected remedy with State Department of Natural Resources concurrence includes:

- A time-critical removal action (TCRA) in 2011 of coal tar related non-aqueous phase liquid (NAPL) in the river sediments, and sediments contaminated over a site-specific cleanup standard of 45 parts-per-million (ppm) total poly-aromatic hydrocarbons (PAHs).
- Covering any sediments left remaining, if any, over the standard with clean materials after final dredging occurs. The cover is to be monitored to ensure that it is stable and remains in place.
- Granting no further action status after completion of these tasks. Subsequently, the site will be subject to US EPA's 5-year review process.

This site is within the Sheboygan River and Harbor (SRH) Superfund site, and the remedy selected was time-critical due to the risk of potential mobilization of NAPL due to planned dredging for poly chlorinated biphenyl (PCB) contaminated sediments for the SRH Superfund site. This TCRA was accomplished by WPSC in 2011. Upland remediation at the site occurred under State supervision in 2000 to 2001.

The Great Lakes Legacy Act (GLLA) project will conduct dredging at the site in the near future to remove additional sediments contaminated by MGP residuals to a stricter PAH standard. Cover materials were not put in place in anticipation of the GLLA dredging. The WDR Water Quality Division provided these comments regarding additional dredging:

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*WDNR had reviewed and commented on the site's Superfund RI/FS, the Proposed Plan, and other documents in the past. While we did not agree with EPA on the proposed Superfund cleanup levels and criteria, we believe that the Superfund action has resulted in improvements in the river.*

*To address the remaining risk at Camp Marina and to remove residual PAH, NAPL, and other contaminants from the Camp Marina site and other portions of the lower river we are looking forward to implementing the Legacy partnership with EPA and local government to remove additional sediment and contaminants to address beneficial use impairments in the river*

Thank you for your support and cooperation in addressing the contaminated sediments at the Campmarina Former MGP Site River Operable Unit. If you have any questions about this letter, please contact John Feeny at 920-892-8756 extension 3023.

Sincerely,



Mark Giesfeldt, P.E., Director  
Bureau for Remediation and Redevelopment

c: Tom Wentland, Vic Pappas, SER  
SER File