

Feeney, John M - DNR

From: Valentin, Pablo <valentin.pablo@epa.gov>
Sent: Wednesday, September 26, 2018 4:12 PM
To: Feeney, John M - DNR
Subject: FW: WPSC Campmarina - PROPOSED APPROACH FOR UPLAND AREA OF SITE

Hi John:

Please see attached message from my supervisor to Judy Fassbender in relation to WPSC Camp Marina.

Thanks,

Pablo N Valentin
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US EPA Region 5
Superfund Division
RRB 1 Section 2
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Chicago, IL 60604
312-353-2886

From: Frey, Rebecca
Sent: Wednesday, September 26, 2018 12:49 PM
To: Judy Fassbender <judy.fassbender@wisconsin.gov>
Subject: WPSC Campmarina - PROPOSED APPROACH FOR UPLAND AREA OF SITE

Hi Judy,

EPA Region 5 has discussed internally a proposed approach for addressing the upland area of the WPSC Campmarina site. I've summarized our thinking below. As noted below, we would like to get your email concurrence on the following proposed approach:

Brief Background

- The WPSC Campmarina Site is currently designated as a Superfund Alternative (S.A.) approach site, since there is an Administrative Order on Consent (AOC) for RI/FS between EPA and the PRPs that covers the entire site (and the AOC contains appropriate S.A. provisions).
- The site has two separate operable units (OUs): the Upland OU and the River OU. The current RI/FS AOC requires the PRP to conduct an RI/FS at the entire site (both OUs).
- When the site came into the EPA S.A. program, the upland area of the site had already undergone remediation pursuant to a state-issued ROD. The remedy had already been implemented and the upland area had already been redeveloped.

- The River OU was subsequently addressed under EPA's S.A. program, through completion of an RI, implementation of a time-critical removal action, and issuance of a No Further Action ROD.
- To date, an RI/FS has not been conducted at the Upland OU pursuant to the EPA RI/FS AOC with the PRPs.

Basis for Proposed Approach

- Given that the Upland OU had already undergone prior cleanup work under state authority a number of years before EPA ever evaluated the site, EPA has done a current evaluation of whether the Upland OU qualifies as an "NPL-caliber" site.
- The Upland OU does NOT score high enough to be placed on the NPL, so is not "NPL-caliber." (Note that, when doing HRS scoring, we are supposed to take into account earlier cleanup actions.)
- Based on the above, the Upland OU should never have come into the S.A. program in the first place.

Conclusion and Proposed Approach

- The Upland OU is not NPL-eligible.
- The upland area of the site is best handled under state authority.
- EPA proposes to remove the Upland OU from the EPA S.A. site.
- EPA would retain the River OU as part of the EPA S.A. site.

Does this make sense to WDNR? If so, please respond via email with your concurrence, and we will proceed with the steps necessary for removing the Upland OU from the S.A. site. If you have any questions or concerns or would like to discuss this matter further, please feel free to contact me at your convenience.

Thanks,
-Becky

Becky Frey
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