



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

REPLY TO THE ATTENTION OF:

SR-6J

10/16/2019

Dr. J. Val Klump (via email)
Great Lakes WATER Institute
600 E Greenfield Ave.
Milwaukee, WI 53204-2944

Dear Dr. Klump,

The purpose of this letter is to provide both a summary of questions and concerns from the recent meeting and information about actions taken at the Solvay Coke and Gas Company Site (the Site) to address recent odor complaints. As you are aware, the U.S. Environmental Protection Agency (EPA) is overseeing a cleanup led by a potentially responsible party (PRP), We Energies, to address actual or potential threats to human health or the environment at the Site.

EPA was first contacted by faculty, students, and staff at the University of Wisconsin-Madison – School of Freshwater Sciences (UWM-SFS) beginning the week of July 15, 2019, with odor complaints as they potentially relate to the remediation work at the Site. EPA met with the UWM-SFS on July 19th and July 25th. Following the last meeting, work practices were modified at the Site to help address potential for odor generation, and We Energies installed carbon filters on select air intakes at the UWM-SFS. EPA received additional odor complaints from the UWM-SFS beginning the week of September 13, 2019, and attended a meeting at the UWM-SFS organized by the City of Milwaukee Health Department on October 7, 2019. EPA is providing a summary of the major concerns voiced during the recent meeting with responses discussed below.

Meeting attendees recommended that EPA conduct a broader community outreach effort to ensure the neighborhood is aware of what steps they should take if they have odor complaints.

EPA is working closely with the Wisconsin Department of Natural Resources (WDNR), the Wisconsin Department of Health Services (WDHS), and the City of Milwaukee Health Department (MHD) to compose a fact sheet to distribute to members of the broader community by the end of October.

Meeting attendees requested information about EPA screening levels for acute inhalation exposure.

EPA uses public exposure guidelines to predict how members of the general public could be affected if they are exposed to a particular hazardous chemical in an emergency response situation. The primary public exposure guidelines used by EPA are the Acute Exposure Guideline Levels (AEGLs), which are accessible at: <https://www.epa.gov/aegl/access-acute-exposure-guideline-levels-aegls-values#chemicals>. AEGL values represent threshold levels for the general public. This includes susceptible subpopulations, such as infants, children, the elderly, persons with asthma, and those with other illnesses.

For compounds for which an AEGL has not yet been established, EPA uses applicable Occupational Safety and Health Administration (OSHA) or National Institute for Occupational Safety and Health values for screening for acute inhalation exposure.

Meeting attendees requested that EPA provide the School of Freshwater Sciences access to the real-time air monitoring system data output on a continuous basis.

EPA will continue to review the real-time air monitoring logs and air sampling data and provide weekly updates to the Site webpage on EPA's website at www.epa.gov/superfund/solvay-coke.

Meeting attendees requested information on the number of times the action levels at the perimeter of the Site have been exceeded.

EPA is compiling a total of real-time action level exceedances to date. This information will be posted to EPA's website at: www.epa.gov/superfund/solvay-coke.

Since mid-September, only one exceedance of the 0.5 parts per million (ppm) total volatile organic compound (TVOC) action level has been recorded at the Site. This exceedance was recorded at Air Monitoring Station (AMS)-1, the AMS located nearest to the UWM-SFS building. Site operators responded by adjusting work practices to return TVOC levels at AMS-1 to below the 0.5 ppm TVOC Action Level.

The 0.5 ppm TVOC action level does not represent a not-to-exceed value. Real-time perimeter air monitoring is utilized as a Site management tool to alert Site operators when adjustments to work in the field are necessary at the Site to ensure protectiveness of the ambient air at the Site perimeter for the duration of intrusive soil remediation activities.

EPA uses the average of results for each contaminant from analytical air sampling conducted at the Site perimeter at each air monitoring station to determine protectiveness of the ambient air. The averages are then compared to acceptable air concentrations, which are conservatively calculated in accordance with EPA guidance including a hypothetical scenario where residents would spend 24 hours a day, seven days a week at the Site perimeter for the duration of intrusive soil activities. At this time, average air concentrations remain within the acceptable air concentrations calculated for the Site. EPA will continue to monitor this data to ensure emissions from the Site remain protective.

Meeting attendees requested a log of the days the Hotline number was called, and the actions taken at the Site in response to the calls.

EPA is responding to complainants individually. When odor complaints are received by EPA, EPA transmits the odor complaint to We Energies. The PRP's contractors then evaluate potential odors at the location of the complaint, may screen the air at the location of the potential odor complaint with a handheld monitoring device, assess whether odor migration is significant and attributable to the Site, and if so, respond with adjustments to work practices at the Site such as realignment of perimeter misting fans dispersing an odor suppressant to account for wind direction and work area migration, spraying more odor-suppressant foam, and/or reducing the size of open trenching areas and associated stockpiles.

Meeting attendees requested an update on any measures being taken to mitigate off-site migration of odors and when these actions are to be completed.

The following additional measures are being taken at the Site to further mitigate potential for off-site migration of odors:

- A temporary cover system will be applied to areas where remediation work has recently been completed or areas that have been disturbed by trenching work and will not be actively remediated in the immediate future. The temporary cover system consists of a spray application that hardens on applied surfaces and provides a barrier to odor migration. These measures will be implemented beginning early next week.
- Soil and debris stockpiles are generated at the Site through trenching activities. Previously, odor-suppressant foaming was employed on debris and soil stockpiles to mitigate odor generation. Beginning this week, tarping will be utilized, in addition to foaming, over stockpile and debris piles with odor producing potential.
- In response to previous odor complaints, misting fans spraying an odor suppressant were deployed at the Site. By the end of next week, significantly larger misters are to be in operation at the Site.

I hope this summary provides you with sufficient details from our meeting. EPA recognizes the concerns of personnel at UWM-SFS and will continue to work with you as the cleanup proceeds. Please feel free to contact me at (312) 886-6943 or patel.viral@epa.gov with any questions or concerns.

Sincerely,



Viral Patel
Remedial Project Manager

Cc: Margaret Brunette, WDNR
Curtis Hedman, WDHS
Lindor Schmidt, Jean Schultz, Nick Tomaro, MHD