



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

REPLY TO THE ATTENTION OF:

SR-6J

November 21, 2019  
Mr. Robert Paulson (via email)  
Principal Environmental Consultant  
333 West Everett Street A231  
Milwaukee, WI 53203

Re: **Removal Action Work Plan – Revision 1 and Responses to Comments**  
**Removal Action Work Plan (RAWP) – Addendum 1 Responses to Comments**  
**Removal Action Work Plan (RAWP) – Addendum No. 2**  
**Solvay Coke and Gas Company Site, Operable Unit 2**  
**U.S. EPA Docket No. V-W-17-C-010**

Dear Mr. Paulson,

The primary purpose of this letter is to formally notify Wisconsin Gas LLC (d/b/a We Energies) that pursuant to Section VII. Designation of Contractor, Project Coordinator, and On-Scene Coordinator, Paragraph 23 of the subject ASAOC, the United States Environmental Protection Agency (EPA) is changing its designated On-Scene Coordinator (OSC)/Remedial Project Manager (RPM). Effective November 21, 2019, EPA has designated the following individual as the OSC/RPM:

Mr. Scott Hansen  
Superfund and Emergency Management Division  
Remedial Response Branch 2, Remedial Response Section 5

All future correspondence regarding the subject Site should be directed to Mr. Hansen at:

U.S. EPA Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604  
(312) 886-1999  
hansen.scott@epa.gov

In addition, EPA, in consultation with the Wisconsin Department of Natural Resources, has completed a review of the following submittals: Removal Action Work Plan ("RAWP"), Revision 1 Responses to Comments dated August 2, 2019; RAWP – Addendum 1 Responses to Comments, dated August 2, 2019; and RAWP – Addendum 2, dated July 26, 2019. Comments are organized by document below.

### **Removal Action Work Plan – Revision 1 Responses to Comments**

In a letter dated July 8, 2019, EPA provided partial approval of the Removal Action Work Plan – Revision 0. This partial approval was applicable to the plans and procedures described in the Removal Action Work Plan – Revision 0, as modified by the draft responses to comments, necessary for the implementation of the in-situ soil stabilization/solidification (“ISS”) component of the selected remedy and for continuing delineation of source materials under the procedures described in Section 3 of the Removal Action Work Plan – Revision 0. EPA provided We Energies approval to proceed with ISS in Areas 1, 2, 3, and 4 as depicted in Draft Figure 1 – ISS Column Layout, dated June 19, 2019 and submitted July 7, 2019.

Responses to comments are sufficient and EPA has no further comments on the Revision 1 Responses to Comments. EPA is increasing the scope of the July 8, 2019 partial approval to include those revisions incorporated by the August 2, 2019 Responses to Comments.

### **Removal Action Work Plan – Addendum 1 and Responses to Comments**

Responses to comments are sufficient and EPA has no further comments on Addendum 1 and Responses to Comments. EPA is fully approving Addendum 1.

### **Removal Action Work Plan – Addendum 2**

Pursuant to Paragraph 35.b of the Subject AOC, EPA is partially approving RAWP Addendum 2. This partial approval is of all plans and procedures proposed in Addendum 2, to be completed under the approved plans and procedures described in the Removal Action Work Plan, Revision 0, as approved herein, excepting any work that may interfere with the resolution of the following comment to EPA’s satisfaction.

- 1. Attachment 3, Figure 7 – ISS Construction Plan.** Completion of ISS as depicted in RAWP Addendum 2, Figure 7 may result in ponding in the No Observed Source Material Area, where no ISS columns are proposed. Complete ISS in the area of No Observed Source Material or provide clarification as to how future ponding in this area will be prevented.

As noted, you may direct all future correspondence, questions, or concerns to Mr. Scott Hansen at (312) 886-1999 or via email at [hansen.scott@epa.gov](mailto:hansen.scott@epa.gov).

Sincerely,



Viral Patel  
Remedial Project Manager

e-cc: Scott Hansen, EPA  
Margaret Brunette, WDNR  
Karl Schultz, Tetra Tech  
Glenn Luke, Ramboll