

**From:** Krueger, Sarah E - DNR  
**Sent:** Tuesday, May 5, 2020 12:52 PM  
**To:** ategen@manitowoc.org  
**Cc:** kmcdaniel@manitowoc.org; Beggs, Tauren R - DNR; Harris.Byers@stantec.com  
**Subject:** Former CN Peninsula and WPS Manitowoc MGP site (BRRTS: 02-36-000219)  
**Attachments:** 20200225\_43\_EPA\_Memo\_Clarification\_of\_2018\_ROD.pdf

Good Afternoon Adam,

I wanted to check back with you regarding the Former CN Peninsula and the WPS site in Manitowoc. Please note I have attached the February memo from EPA regarding the WPS Manitowoc MGP ROD which will not be reopened.

I am curious where the city is with the redevelopment plans for the Former CN Peninsula and adjacent roadways as the MGP site is likely at least a year away from starting the upland remediation. On a call yesterday WPS indicated that the city planned to move forward with roadway construction in the Chicago Street right of way this August. It is likely that WPS will need to address residual contamination within the Chicago Street right of way as part of the upland remedial action, which could likely affect any new road that is constructed in this area before the WPS remediation occurs. Please note that if the city does plan to complete roadway construction, any contaminated soil and/or MGP residuals encountered during roadway and utility work would need to be characterized and properly disposed of by the city.

Please let me know if you have any questions, thank you.  
Sarah

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**Sarah Krueger, P.G.**

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**From:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Sent:** Tuesday, February 25, 2020 2:27 PM  
**To:** Paulson, Robert  
**Cc:** Narendra M Prasad (NMPrasad@integrysgroup.com); Krueger, Sarah E - DNR; Adler, Kevin; Korpela, Adrienne/MKE; Marcus Byker (Marcus.Byker@ramboll.com); Fitzpatrick, William - DNR; Gielniewski, Margaret  
**Subject:** Manitowoc Memo to File - Clarifications and Corrections - September 2018 ROD  
**Attachments:** Memo to File - Clarifications and Corrections - September 2018 ROD Regarding WPSC Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin.pdf

Hello Bob,

Please find the attached Memo to the File for the WPSC Manitowoc MGP Site. This includes EPA's continued position that the Main Building property, in the general business zone, should be remediated to residential standards, with other properties being remediated to industrial standards.

Also, the memo has the corrected ROD Tables 5 and 6 that everyone has so patiently been waiting on.

Please let me know if you have any questions.

Best regards,  
Margaret

Margaret Gielniewski  
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U.S. EPA R. 5 Superfund  
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**From:** Greaves, William <[greaves.william@epa.gov](mailto:greaves.william@epa.gov)>  
**Sent:** Tuesday, February 25, 2020 2:17 PM  
**To:** Gielniewski, Margaret <[gielniewski.margaret@epa.gov](mailto:gielniewski.margaret@epa.gov)>  
**Cc:** Adler, Kevin <[adler.kevin@epa.gov](mailto:adler.kevin@epa.gov)>  
**Subject:** Memo to File - Clarifications and Corrections - September 2018 ROD Regarding WPSC Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin

Margaret,

The Memo to File regarding clarifications and corrections to the September 2018 ROD for WPSC Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin, has been signed and relayed to the Records Center.

A copy in PDF format is attached for your records.

Thanks —

Onward,

Bill Greaves

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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FEB 25 2020

**MEMORANDUM**

**SUBJECT:** Clarifications and Corrections to the September 2018 Record of Decision  
Wisconsin Public Service Corporation Manitowoc Manufactured Gas Plant  
Superfund Alternative Site, Manitowoc, Wisconsin

**FROM:** Douglas Ballotti   
Director  
Superfund & Emergency Management Division

**TO:** Site File

**Background**

On September 21, 2018 the U.S. Environmental Protection Agency (EPA) issued a Record of Decision (2018 ROD) for Operable Unit 1 (Source Control) of the Wisconsin Public Service Corporation (WPSC) Manitowoc Former Manufactured Gas Plant (MGP) Superfund Alternative site (Manitowoc site) in Manitowoc, Wisconsin. In the 2018 ROD, EPA selected Alternative 3a as the final remedy for Operable Unit 1 and the Wisconsin Department of Natural Resources concurred with the decision.

This memorandum clarifies the definition of the term “general business use” as given in the 2018 ROD and corrects errors in the soil remediation goals listed in Tables 5 and 6 of the 2018 ROD. EPA considers these actions to be non-significant changes to the chosen remedy in the 2018 ROD and therefore this memorandum to the file is the appropriate means to document the changes.

**Discussion**

The Manitowoc site contains several different buildings and structures that are located within the “general business” and “heavy industrial” zoning districts of the city and EPA has divided the site into several zones (e.g. Chicago Street Zone, Winter Property Zone) for ease of addressing each site parcel.

Alternative 3a in the 2018 ROD calls for:

- In-situ stabilization of highly-contaminated soil in the Chicago Street and Winter Property Zones;

- Maintaining existing and/or installing new (as required) direct contact barriers (such as pavement and roadways) on top of surface soil that exceeds residential cleanup standards in all Manitowoc site zones;
- A one-time placement of oxidizing compounds at the interface of highly-contaminated groundwater and soil;
- Continued operation of an existing groundwater extraction well until a final groundwater remedy is selected; and
- Use of institutional controls (ICs) to restrict future land use to prevent human exposures to contamination remaining at the Site, prevent interference with remedial components, and to help prevent future soil vapor intrusion risks.

Because the 2018 ROD states that “the site area is zoned for multiple uses, including industrial and general business use” (Part II, Section 2.1, second paragraph) and EPA selected residential cleanup levels for the site parcels in the general business zoning district, a question has arisen as to why EPA did not select commercial/industrial cleanup levels for site parcels in the general business zoning district.

The State of Wisconsin has a unique zoning segment apart from the commonly-used zoning terms of heavy industrial, commercial, and residential districts that it calls “general business.” The State allows for various uses within a general business zoning district, ranging from commercial or heavy service industry to residential use. In addition, the city of Manitowoc has shared with EPA its tentative redevelopment plan that includes building new homes along the riverfront in a general business-zoned area just northeast of one of WPSC’s main buildings (see Figure 1, attached), which is also in the general business zoning district. Therefore, EPA determined that the general business district-zoned parcels at the Manitowoc site should be cleaned up to residential standards. Conversely, the Chicago Street and the Winter Building Zones are not in the general business zoning district and are not assumed to be the site of future housing developments; thus, commercial and industrial cleanup levels would apply for these zones.

### **Errors**

Table 5 (Soil Remediation Goals for Industrial/Commercial Areas) and Table 6 (Soil Remediation Goals for General Business/Hypothetical Future Residential Areas) in the 2018 ROD have incorrect soil cleanup levels listed. Corrected Tables 5 and 6 are provided.

### **Non-Significant Changes**

EPA has clarified that a general business zoning district in Wisconsin may allow for residential use; therefore, the application of residential soil cleanup levels in the 2018 ROD for any of the Manitowoc site parcels in the general business zoning district is correct.

Corrected Tables 5 and 6 of the 2018 ROD are given below.

The Wisconsin Department of Natural Resources has indicated that it concurs with these changes to the 2018 ROD for Operable Unit 1 at the Manitowoc site.

**Table 5. Soil Remediation Goals for Industrial/Commercial Areas**

	<b>WDNR Direct Contact RCL (mg/kg)</b>	<b>EPA RSL TCR = 1E-06 THQ = 1 (1) (mg/kg)</b>	<b>Soil Remediation Goal for Industrial/Commercial Areas (mg/kg)</b>
<b>PAHs</b>			
Benz[a]anthracene	20.8	21	20.8
Benzo[a]pyrene	2.1	2.1	2.1
Benzo[b]fluoranthene	21.1	21	21
Benzo[k]fluoranthene	211	210	210
Chrysene	2,110	2,100	2,100
Dibenz[a, h]anthracene	2.1	2.1	2.1
Indeno[1,2,3-cd]pyrene	21.1	21	21
Naphthalene	24.1	17	17
1-Methylnaphthalene	72.7	73	72.7
2-Methylnaphthalene	3,010	3,000	3,000
<b>PVOCs</b>			
Benzene	7.1	5.1	5.1
Ethylbenzene	35.4	25	25
1,2,4- Trimethylbenzene	219	1,800	219
Xylene, o	434	2,800	434
Xylenes, m + p	388	2,400	388
Total Xylenes	2,700	2,500	2,500
<b>Inorganics</b>			
Cyanide, Total	195	150	150
Lead, Total	800	800	800

**Notes:** mg/kg = milligrams per kilogram (parts per billion)

The lesser of the WDNR RCL and the EPA RSL values are the soil remediation goals.

**Table 6.** Soil Remediation Goals for General Business/Hypothetical Future Residential Areas

	WDNR NR 720 Groundwater Pathway RCL (mg/kg)	WDNR Direct Contact RCL (mg/kg)	EPA RSL TCR = 1E-06 THQ = 1 (1) (mg/kg)	Soil Remediation Goal for General Business/Hypothetical Future Residential Areas (mg/kg)
<b>PAHs</b>	--			
Benz[a]anthracene	--	1.1	1.1	1.1
Benzo[a]pyrene	0.47	0.11	0.11	0.11
Benzo[b]fluoranthene	0.48	1.1	1.1	1.1
Benzo[k]fluoranthene	--	11	11	11
Chrysene	0.14	115	110	110
Dibenz[a, h]anthracene	--	0.11	0.11	0.11
Indeno[1,2,3-cd]pyrene	--	1.1	1.1	1.1
Naphthalene	0.66	5.5	3.8	3.8
1-Methylnaphthalene	--	17.6	18	17.6
2-Methylnaphthalene	--	239	240	239
<b>PVOCs</b>				
Benzene	0.005	1.6	1.2	1.2
Ethylbenzene	1.6	8	5.8	5.8
1,2,4- Trimethylbenzene*	1.4	219	300	219
Xylene, o	--	434	650	434
Xylenes, m + p	--	388	550	388
Total Xylenes	3.9	260	580	260
<b>Inorganics</b>				
Cyanide, Total	4	27	23	23
Lead, Total**	27	400	400	400

**Notes:** mg/kg = milligrams per kilogram (parts per billion)

The lesser of the WDNR RCL and the EPA RSL values are the soil remediation goals.

\*Groundwater pathway RCL is for Total Trimethylbenzene

\*\*The background threshold value for lead is 52 mg/kg

-- No standard established

DATE: February 11, 2020

FILE REF: BRRTS # 02-36-000219

TO: Margaret Gielniewski – U.S. EPA Region 5

FROM: Department of Natural Resources  
Sarah Krueger – Remediation & Redevelopment Program  
Bill Fitzpatrick – Remediation & Redevelopment Program

SUBJECT: Clarifications and Corrections to the September 2018 Record of Decision Wisconsin Public Service Corporation Manitowoc Manufactured Gas Plant Superfund Alternative Site, Manitowoc, Wisconsin – State Concurrence

We have reviewed the draft document sent to us in an email dated February 3, 2020

- 1) General Comment – Superfund requirements are similar to Wisconsin's Spill Law but not necessarily equivalent in all aspects. Wisconsin generally tries to coordinate with EPA and the responsible parties during investigation and cleanup; however, Wisconsin can't ensure that Superfund decisions meet all state requirements. Superfund requirements may not meet all the state regulatory requirements needed for case closure under Wis. Admin. Code ch. NR 726.
- 2) Land Use – The City of Manitowoc has been considering redevelopment plans for the river shoreline properties. Zoning of the properties may change to accommodate redevelopment. For site closure under state regulations the current zoning of the properties at the time of the closure request will be considered.
- 3) Concurrence – We have reviewed the memo to file and concur with the direction with respect to why general business zoned properties need to be cleaned up to non-industrial (residential) criteria and the proposed changes to Tables 5 and 6 to the Manitowoc 2018 ROD.



