

Your opinion wanted

EPA invites your comments on the proposed cleanup plan for the WPSC Manitowoc MGP site. Your input is important because EPA may modify or select another cleanup option based on public comments. There are several ways your voice can be heard during the public comment period that runs from July 23 to Aug. 22, 2018.

- Fill out and return the enclosed comment form by the deadline.
- E-mail comments to EPA Community Involvement Coordinator Susan Pastor at pastor.susan@epa.gov.
- Fax comments to Susan at 312-385-5344.

To request a public meeting, contact Susan Pastor by July 30, 2018.

For more information

If you have questions about the comment period or want to learn more about the WPSC Manitowoc MGP site you can contact these team members:

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Remedial Project Manager 312-886-6244 gielniewski.margaret@epa.gov

Susan Pastor

Community Involvement Coordinator Superfund Division 312-353-1325 pastor.susan@epa.gov

Or visit: www.epa.gov/superfund/wpscmanitowoc.

EPA Proposes Cleanup Plan for Soil, Groundwater

WPSC Manitowoc Manufactured Gas Plant Site

Manitowoc, Wisconsin

July 2018

To clean up soil and groundwater contamination at the Wisconsin Public Service Corp., or WPSC, Manitowoc Manufactured Gas Plant, or MGP, site, U.S. Environmental Protection Agency is proposing to stabilize soil in-place, maintain existing and install new barriers (such as roads, pavement and grass) over contaminated soil, monitor groundwater, and place restrictions on soil and groundwater use to minimize exposure. The cleanup will also include a one-time, in-place chemical oxidation treatment to address contaminants in groundwater. Chemical oxidation uses chemicals to help change harmful contaminants into less toxic ones.

The goal of the cleanup is to prevent human exposure to harmful levels of the main contaminants in soil and groundwater which are benzene, toluene, ethylbenzene and xylene, or BTEX and tar-like chemicals called polycyclic aromatic hydrocarbons, or PAHs.

The purpose of this proposed plan is to provide background information about the MGP site, describe the various cleanup alternatives considered, and identify EPA's recommended cleanup alternative.¹ The public is encouraged to comment on this proposed plan. EPA will be accepting comments from July 23 to Aug. 22 (*see box, left, for ways you can participate in the decision-making process*).

Site background

WPSC owns approximately 1.1 acres. There are currently two office buildings on the property with adjacent areas covered by pavement and grass. The site also includes neighboring commercial and industrial buildings, roads and right of ways on 2.5 acres. The Manitowoc Gas Co. constructed the original gas manufacturing facilities at the site between 1900 and 1906. Wisconsin Fuel & Light Co. purchased the facilities from The Manitowoc Gas Co. and manufactured coal gas for lighting and heating until 1947. The MGP facilities were demolished in the 1960s and replaced by an office building. WPSC purchased the property in 2001.

Between 1988 and 2015, multiple investigations have been conducted on the site and on nearby industrial properties. These investigations involved soil, groundwater, and sediment samples at various locations on the site and adjacent properties. Sediment will be addressed in a future cleanup.

¹Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA known as the Superfund law) requires publication of a notice and a proposed plan for the site remediation. The proposed plan must also be made available to the public for comment. This fact sheet summarizes information contained in the feasibility study and other documents in the administrative record for the WPSC Manitowoc MGP site. They are available for review at the Manitowoc Public Library, 707 Quay St., Manitowoc.

Summary of site risks

BTEX and PAHs remain in the soil near and under the building on the WPSC and "Winter" properties. Contaminants also remain in the groundwater, as well as the soil gas near the Winter building foundation. EPA studied potential current and future risks to people who live and/or work nearby. EPA determined that the contaminants from MGP activities may pose unsafe risks and hazards to industrial, commercial, and construction workers, recreational visitors and residents through possible contact with contaminated soil, dust, sediment, and groundwater.

Past cleanup actions

WPSC did several cleanups under Wisconsin Department of Natural Resources, or DNR, oversight. In 1993, an anchor system on an existing contamination barrier, between the land and Manitowoc River, was replaced and more than 3,000 cubic yards of contaminated soil were removed. An anchor system is a set of connected beams, rods, and anchors that provide stability for the barrier, preventing it from moving or collapsing. In 1993 and 1994, approximately 13,700 cubic yards of soil were treated on the north, west and south sides of a building on the property. The top four feet of soil were also removed on the north side of the building. The excavated areas were backfilled with clean soil.

In 1997, WPSC installed a well to prevent contaminated groundwater from moving off-site and into the Manitowoc River. WPSC continues to regularly monitor all wells to make sure groundwater is not moving off-site.

Proposed cleanup options

EPA established cleanup goals to address contaminated soil and groundwater. To meet these goals, EPA studied several alternatives. The Agency developed these alternatives using combinations of different technologies and evaluated each one in detail against the selection criteria established by federal law (*see box, right*).

Alternative 1 – No-Further Action. EPA is required to include a "no-action" alternative as a basis for comparison with other cleanup options. This alternative does not include cleanup or monitoring to minimize potential exposures to contaminants. The site's cleanup will be reviewed every five years. **Cost: \$50,000**

Alternative 2 – This alternative involves stabilizing soil in place near Chicago Street, maintaining existing barriers and installing new ones over contaminated soil, monitoring groundwater, and placing restrictions on soil and groundwater use to minimize exposure. **Cost: \$3.3 million**

Alternative 2a – This alternative is identical to Alternative 2 but also includes one treatment action in place, involving chemical oxidation, to address contaminants in groundwater. Cost: \$3.6 million

Alternative 3 – This alternative is similar to Alternative 2. It involves stabilizing soil in place for the site near Chicago Street, maintaining existing barriers and installing new ones over contaminated soil, monitoring groundwater, and placing restrictions on soil and groundwater use to minimize exposure. In addition, Alternative 3 includes stabilizing soil in place near the Winter property, which is located south of the site, and is where additional MGP activities occurred. **Cost: \$6.9 million**

Explanation of Evaluation Criteria

1. Overall protection of human health and the environment. Examines whether an alternative protects both human health and the environment. This standard can be met by reducing or removing pollution or by reducing exposure to it.

2. Compliance with applicable or relevant and appropriate requirements. Ensures alternatives comply with federal and state laws.

3. Long-term effectiveness and permanence. Evaluates how well an alternative will work over the long term, including how safely remaining contamination can be managed.

4. Reduction of toxicity, mobility or volume through treatment. Determines how well the alternative reduces the toxicity, movement and amount of pollution.

5. Short-term effectiveness. Compares how quickly an alternative can help the situation and how much risk exists while the option is under construction.

6. Implementability. Evaluates how feasible the alternative is and whether materials and services are available in the area.

7. Cost. Includes not only buildings, equipment, materials and labor but also the cost of maintaining the alternative for the life of the cleanup.

8. State acceptance. Determines whether the state environmental agency accepts the alternative. EPA evaluates this criterion after receiving public comments.

9. Community acceptance. Considers the opinions of the public about the proposed cleanup plan. EPA evaluates this criterion after a public comment period.

*Alternative 3a Recommended alternative – This alternative is identical to Alternative 3 but also includes one treatment action in place, involving chemical oxidation to address contaminants in groundwater. Cost: \$7.2 million

Alternative 4 – This alternative involves in-place thermal treatment of contaminated soil in the WPSC, Chicago Street, and Winter Zones. It also includes maintaining existing barriers and installing new ones over contaminated soil, monitoring groundwater, and placing restrictions on soil and groundwater use to minimize exposure. **Cost: \$13.8 million**

Alternative 5 – This alternative involves excavating contaminated soil from the Chicago Street and Winter zones and in-place treatment of contaminated material in the WPSC source zone. It also involves maintaining existing barriers and installing new ones over contaminated soil, monitoring groundwater, and placing restrictions on groundwater and soil use to minimize exposure. **Cost: \$14.9 million**

EPA proposes Alternative 3a because it best meets the evaluation criteria among all the alternatives and protects human health and the environment. It also meets federal and state requirements and will be effective in the longterm. The table below provides a comparison of the alternatives. Full details about the proposed plan and the other alternatives considered are in the technical documents on file at the Manitowoc Public Library and in the administrative record on the EPA website: www.epa.gov/superfund/wpsc-manitowoc.

Next steps

Before making a final decision, EPA will review comments received during the public comment period. The Agency may modify the proposed plan or select another option based on new information. EPA encourages you to review and comment on the cleanup alternatives.

EPA will respond in writing to the comments in a "responsiveness summary," which will be attached to the document detailing the final cleanup plan called the record of decision. EPA will announce the selected cleanup plan in a local newspaper advertisement, place a copy of the record of decision in the local information repository and post it on the web.

Final groundwater and river cleanups will be proposed at later dates.

Evaluation Criteria	Alternative	Alternative	Alternative	Alternative	Alternative	Alternative	Alternative
	1	2	2a	3	3a*	4	5
Overall Protection of Human Health and the Environment	0	۲	۲	•	•	۲	۲
Compliance with Potential Applicable or Relevant and Appropriate Requirements	0	•	•	•	•	•	•
Long-Term Effectiveness and Permanence	0	۲	۲	•	•	۲	•
Reduction of Toxicity, Mobility, or Volume Through Treatment	0	۲	۲	•	•	•	۲
Short-Term Effectiveness	0	•	•	•	•	۲	0
Implementability	0	•	•	۲	۲	0	0
Total Estimated Cost	\$50,000	\$3.3 million	\$3.6 million	\$6.9 million	\$7.2 million	\$13.8 million	\$14.9 million
State Acceptance	Will be evaluated after the public comment period						
Community Acceptance	Will be evaluated after the public comment period						

Chart comparing cleanup alternatives with the nine Superfund cleanup selection criteria

*EPA's recommended alternative

O Does not meet criteria • Partially meets criteria • Fully meets criteria

Use This Space to Write Your Comments

EPA is interested in your comments on the proposed cleanup plan for the WPSC Manitowoc MGP site. You may use the space below to write your comments, then detach, fold, stamp and mail. Comments must be postmarked by Aug. 22, 2018. If you have any questions, please contact Susan Pastor directly at 312-353-1325, or toll free at 800-621-8431, Ext. 31325, weekdays 8:30 a.m. – 4:30 p.m. Comments may also be faxed to Susan Pastor at 312-353-5344 or emailed to pastor.susan@epa.gov.

Name		
Affiliation		
Address		
City	State	_ ZIP

WPSC Manitowoc MGP Comment Sheet

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Place First Class Postage Here

Susan Pastor

EPA Community Involvement Coordinator Superfund Division (SI-6J) EPA Region 5 77 W. Jackson Blvd. Chicago, Il 60604-3590

EPA Proposes Cleanup Plan, Seeks Public Comments

Public comment period: July 23 to Aug. 22, 2018

Full details are on file at:

Manitowoc Public Library 707 Quay St. Manitowoc, WI 920-686-3000

Or on EPA's website: www.epa.gov/superfund/wpsc-manitowoc.

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WPSC MANITOWOC MANUFACTURED GAS PLANT: EPA Proposes Cleanup Plan for Soil, Groundwater

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United States Environmental Protection Agency

