



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

REPLY TO THE ATTENTION OF:
SR-6J

08/12/2019

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

Dear Dr. Klump,

Starting the week of July 15, 2019, the U.S. Environmental Protection Agency (EPA) was contacted by faculty and staff at the University of Wisconsin-Milwaukee School of Freshwater Sciences (UWM-SFS) regarding odor concerns from remediation work at the Solvay Coke and Gas Company Site (Site). The front entrance of the Site is located approximately 800 feet west of the UWM-SFS building. In May 2019, EPA selected a cleanup plan to address actual or potential threats to human health or the environment from the Site. We Energies is implementing the cleanup with EPA oversight. Mobilization of equipment to the Site began in May, preliminary Site prep began in June, and full-scale work started in July.

Fugitive Emissions Management Plan

The work is being conducted under a Fugitive Emissions Management Plan. Under the Plan, air sampling data is evaluated against Acceptable Air Concentrations (AACs) that were derived in accordance with EPA's *Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual [Part F, Supplemental Guidance for Inhalation Risk Assessment]*, USEPA 2009a) and EPA's *Regional Screening Levels (RSLs) - User's Guide* (USEPA 2018).

The primary objective of the air monitoring program at the Site is to minimize fugitive air emissions during the cleanup such that cumulative average perimeter air concentrations are within or below the calculated AAC range for acceptable potential cancer and non-cancer risks.

Under this plan, the most sensitive population in proximity to the Site was identified. The Site perimeter fence is considered the nearest accessible exposure point for the general public to come into contact with fugitive air emissions from the Site. The plan is designed to be protective for hypothetical residents at the Site perimeter and other potential receptors, such as offsite commercial and industrial workers and residents living farther away from the Site.

At this time, EPA has data available from air monitoring conducted through July 25, 2019. To date, cumulative average concentrations are within the calculated acceptable levels for the Site. These data, and the Fugitive Emissions Management Plan will be available on EPA's website at <http://www.epa.gov/superfund/solvay-coke> within the week.

Nuisance Odor

In response to complaints regarding nuisance odors being generated from Site activities, EPA requested that We Energies re-evaluate their current work practices to improve odor mitigation measures. The following additional work practices have been implemented through continued direct coordination between We Energies and their contractors to ensure odors are immediately evaluated and addressed:

- Limitation of the size of pre-excavation trenches to the smallest extent that still allows for completion of the work;
- Proactive application of odor-suppressant foam for coverage of surfaces with odor potential;
- Placement of non-impacted soil over completed pre-excavation areas to serve as a temporary soil cover to reduce odor release;
- Weekly and daily analysis of wind direction and work areas to plan activities that limit, to the extent practicable, disruption to the surrounding community;
- Delay of pre-excavation activities in known areas of significantly impacted material;
- Communication and planning to reduce material handling and transport to reduce soil agitation and volatilization;
- Limitation of the number of vehicles within the work exclusion zone to assist in minimizing airborne particulate matter; and
- Continuous and proactive use of onsite water trucks to reduce all airborne particulate matter.

These additional steps have also been implemented as of August 2, 2019, following the odors experienced by the UWM-SFS students, faculty, and staff:

- Mobilization of an additional odor-suppressant foam unit to the Site;
- Off-site disposal of stockpiled debris (wood, concrete, etc.) with odor generation potential;
- Use of an alternate odor-suppressant foaming agent that is designed to provide longer duration of odor protection in areas that will go undisturbed for longer periods of time;
- Implementation of misting fans dispersing an odor neutralizer over trenching areas; and
- Daily periodic trips by Site representatives to adjacent facilities and areas to survey for offsite odor migration.

Additionally, EPA understands that We Energies is working with the UWM-SFS facilities personnel to evaluate mitigation options within the building envelope. EPA recognizes the concerns of personnel at UWM-SFS and we will continue to work with you as the cleanup proceeds. Please do not hesitate to contact me at (312) 886-6943 or at patel.viral@epa.gov. Immediate odor complaints should be made to We Energies at (877) 380-0522 for the most timely response.

Sincerely,



Viral Patel
Remedial Project Manager

cc (via email): Robert Paddock, Zachary Steuerwald, James Fay UWM
Margaret Brunette, WDNR
Lindor Schmidt, City of Milwaukee Health Department
Clara Jeong, WDHS
Bob Paulson, We Energies