U.S. Environmental Protection Agency



Community Involvement Plan

Wisconsin Public Service Corporation Campmarina Manufactured Gas Plant Site

City of Sheboygan, Sheboygan County, Wisconsin

W.A. No. 005-CRCR-05ZZ / Contract No. EP-S5-06-01

April 2007

Introduction

This Community Involvement Plan for the Wisconsin Public Service Corporation Campmarina Manufactured Gas Plant site was prepared by U.S. Environmental Protection Agency, which is responsible for community involvement and cleanup activities at the site under the federal Superfund program. This CIP provides background information on the site and recommends activities EPA will do to continue to inform the public and local officials about progress at the site, and to encourage community involvement during the site cleanup.

This CIP also discusses the concerns of nearby residents and local officials regarding the site and ways for EPA to address them. The information in this plan is based primarily on discussions with residents that took place in March 2007.

Site description

Location and site features

The WPSC Camparina site is located at 732 N. Water St. in Sheboygan, Wis., on the north bank of the Sheboygan River and includes about 1.5 acres of land and an additional 3.4 acres of contaminated area in the river. The site is located in an area that was historically industrial, but is currently used as a park and marina. There is a river walk located immediately adjacent to the river shoreline.

Site Map



Site background

History and cleanup progress

WPSC owned and operated the MGP located on the site from 1872 to 1929. The city of Sheboygan currently owns the property. MGPs operated in Wisconsin from the late 1800s to the mid-20th century to provide fuel or electricity from coal or oil. To manufacture the fuel, coal and other ingredients were heated in large brick ovens. As the coal was heated, it produced a gas. The gas was filtered from the ovens and stored in tanks. The gas was then used as fuel throughout a community. By the early 1900s, Wisconsin had at least 70 MGP sites across the state. Manufacturing gas from coal generated a lot of waste. Typically, the coal waste was dumped in nearby ravines, ditches or used as fill for construction projects. Today, much of the waste is found to be hazardous. The waste includes cyanides, metals, solvents and oily tars. The oily tars are composed primarily of a group of compounds commonly found in motor oils called polynuclear aromatic hydrocarbons or PAHs. PAHs commonly found in MGP waste may also cause cancer in humans.

In January 2007, a legal agreement called a consent order was signed between WPSC and EPA. This agreement allows for further investigation of the area to begin later this year to find out if there is any contamination at the site.

The upland portion of the site (the 1.5 acres near the river) was cleaned up according to a state-issued decision in 2002. That cleanup included excavation and off-site thermal treatment of 10,500 tons of soil (which was beneficially reused on site), site grading, material management, disposal of debris, and a containment system. The containment system consists of a vertical sheet pile barrier wall around the edge of the site with a heavy plastic cover over the surface. A "biosparge" system injects air through underground pipes to enhance the natural breakdown of contaminants within the containment barrier.

Contaminants

The primary site contaminant is PAHs, hazardous organic chemicals commonly found at MGP sites that may cause cancer in humans. PAHs were introduced to the WPSC Campmarina site through the disposal of waste created during fuel production. Most of the PAH contamination from MPG sites is in the form of coal tar buried under soil and does not pose a direct health risk; however, if coal tar residues come in contact with skin, it can cause redness or a rash. In some people, the coal tar can cause a sunburn effect on skin. Eye irritation is another hazard if coal tar residues get in the eyes.

Liability

WPSC has been identified as the party responsible for the contamination of this site. The company has agreed to pay for an investigation of that contamination.

Community background

The site lies within the city of Sheboygan. Because some of the contamination is in the Sheboygan River, it is possible that residents of Sheboygan Falls might be concerned by the contamination especially if the cleanup is tied to the Sheboygan River and Harbor Superfund site cleanup that is taking place. Sheboygan County is located between Milwaukee and Green Bay along Lake Michigan. Sheboygan is located east of Interstate 43, and the city of Sheboygan

Falls is located west of Interstate 43. The table below summarizes housing, income and population characteristics for these communities, Sheboygan County and the state of Wisconsin. Sheboygan has the lowest household income in the area, falling below the state's average.

Community	Median Household Income (2003)	Median Home Value (2000)	Population (2000)
City of Sheboygan	\$40,066	\$89,400	50,792
City of Sheboygan Falls	\$47,205	\$111,611	6,772
Sheboygan County	\$49,221	\$106,800	112,646
State of Wisconsin	\$46,538	\$112,200	5,363,675

Source: U.S. Census Bureau, 2007

Status of community involvement activities

EPA's community involvement activities began March 12-14, 2007 when community interviews were held in anticipation of completion of this CIP. The purpose of the community interviews was to assess how much the community knew about the site, obtain area residents' and local officials' concerns about the site, and determine what information they wanted EPA to provide them and the best way to disseminate that information.

Community issues and concerns

Overall, few residents and local officials who were interviewed in March 2007 had concerns about the WPSC Campmarina site. This was partly due to unfamiliarity with the site and the focus placed on the Sheboygan River and Harbor Superfund site. The contamination from the Sheboygan River and Harbor site is in the same general area as the WPSC Campmarina site.

Most of the residents who expressed concern explained how the contamination has affected their recreational activities, such as fishing and boating in the river. Some described rashes that they and their dogs have gotten from being in the river. Most residents were concerned with how the site cleanup would affect dredging and the ongoing cleanup of the Sheboygan River and Harbor site. Some residents believed that the amount of dredging that is proposed in the harbor is not sufficient, especially for boating activities. Residents acknowledged that they were interested in seeing additional dredging to improve navigation, not necessarily to remove more contamination. This is because of the low water level in the Sheboygan River.

Summary of community interviews

About two dozen residents and local officials were interviewed. Generally, residents were unfamiliar with the WPSC Campmarina site but were familiar with the Sheboygan River and Harbor Superfund site and were interested in how this "new" site would affect the ongoing cleanup of the river. Following is a summary of the answers received during the community interviews.

What do you know about the WPSC Campmarina MGP site?

Most residents and officials were unaware of the contamination at the WPSC Campmarina site and unfamiliar with the name Campmarina. Residents who had lived in the area the longest were familiar with the Campmarina area; they remembered that the area had once been used as a campground along the shoreline for RVs and boaters, and some had a vague recollection that an MGP had once been on the site. It was surmised that this is how the site got its name.

Generally, it was found that Campmarina is not a name the community is familiar with. Several people knew the location as Worker's Park. Someone suggested that the site be called "Coal Dump" – because it was known that WPSC took coal and made fuel with it and that the waste seeped into the ground.

A city official did know that the site was formerly owned by WPSC, was the site of a coal gasification plant, and that the river was polluted by the plant.

One person remembered the prior cleanup and mentioned the removal of barrels of material from the site; one barrel was reported to contain a tar-like substance. Another official had attended an event where the WPSC Campmarina site was discussed. Someone else said they did not know anything was wrong until they saw digging. Another person knew the land had been cleaned up so that condominiums could be built there.

Wisconsin Department of Natural Resources officials had heard about the site and had seen an old fact sheet about it. They were aware the site was once capped with sheet metal and that sediment on the site is still contaminated. One official remembered that in 1990, while a floating pier was being constructed near the site, tar was found bubbling up.

Although most were unfamiliar with the Campmarina site, everybody who was interviewed was familiar with the Sheboygan River and Harbor Superfund site and the ongoing cleanup of the upper portion of the river. Most had questions and concerns about that site.

What concerns do you have about the site?

Residents and officials wanted to know how the WPSC Campmarina site would affect the Sheboygan River and Harbor Superfund site and whether the Campmarina site would conflict with the Sheboygan Harbor cleanup or if the two cleanups could be combined.

There is a concern that Superfund focuses on environmental risks and human health but does not solve use impairment issues. Once the dredging is done, they are concerned it will be too late to do more. Someone was concerned with the possibility of the contaminants flowing down the river.

WDNR officials expressed concern about the timing of the sediment cleanup. WDNR officials would like to see the PAH and PCB cleanup done at the same time. Because contamination levels get higher deeper in the sediment, the river will need to be dredged. Dredging should encompass both contaminants.

Dredging for navigational purposes is important to the public. Although EPA's concern is cleaning up the contamination, if dredging is conducted, the hope is that these efforts can be coordinated because duplicate dredging is bad for the environment and will cause problems for everyone.

There is the concern that disturbing the river might stir things up and cause problems; that dredging too deep might result in more problems for the area. Someone was very concerned because there are plans to park a naval destroyer, the USS Edson, across from the site, and

this would require dredging and stir the contamination up.

Officials were concerned with public reaction to the "new" site and how to educate the public about it. A developer wanted to know if contamination on an area he is trying to develop is linked to the Campmarina site.

From a community standpoint, having the river cleaned up would benefit businesses and residents. Because the river feeds the boating and fishing industry, one concern was that these interests still need to be addressed during the cleanup.

Someone was concerned that people are eating fish out of the river and that certain groups are not paying attention to the fish advisories. Several people mentioned they want the river safer for fish. Someone also mentioned that there is a lot more boat traffic in the site area than people realize.

WDNR also is concerned that it is easy to walk into the tar. Because the site is in a park-like setting, people are basically invited to the water's edge. There also is a lot of boating in the area and anchoring in the contaminated sediment is an issue.

One resident is concerned with the safety of children playing in the area.

A person who works in the water and has gotten rashes from the water is glad that something is finally happening. He said that it had been too long and he was happy the site was being looked into.

Some questions that were asked included:

- Who is responsible for the cleanup?
- Who will pay for the cleanup?
- Will the park that is on the site be torn down?
- Do people have access to the water?
- What are the impacts of PAHs on humans, animals, and waterfowl?
- Are there buildings on the site?
- Will the whole river bed be tested or just "hot spots?"
- Are people near the site being notified of what is going on?
- Is it safe to eat fish from the river?
- How will the cleanup process work?
- Is this a Superfund site?
- Is there a timeline?
- Will this site cleanup be affected by a change in administration?
- Does dredging for PCBs affect the downstream part of the river
- Was water (water supply) involved in the contamination?
- Would it be better to just leave the sediment buried?
- Is there bioaccumulation (the buildup or storage of substances [such as contaminants] over time) in aquatic species?
- Are there other sources in the watershed that might be contributing PAHs?
- What is the ultimate goal of this phase to gather data or to clean up the site?
- What studies have been conducted and what have they found?
- What types of contamination exist and how long has it been there?
- How long have the PAHs been in the river? Do PAHs degrade over time?
- How were the PAHs in the river discovered?
- Will the dredging for the cleanup affect or assist with the navigation dredging that is desired by the boating community?

- Are the characteristics of PCBs (the contaminant from the Sheboygan River and Harbor Superfund site) and PAHs the same?
- Is the city involved with discussions about the cleanup?
- Will piers and boats around the nearby island (referred to as either Boat or Goat Island) need to be moved during the actual cleanup?

Several people asked what their groups (like the Sheboygan River Basin Partnership) could do to help.

What risks do you think the site, in its current state, pose to you or your children?

Someone was concerned that the site had the potential to affect water quality, fisheries and Lake Michigan. Eating fish from the river was mentioned as a potential risk.

Some people mentioned rashes on people and dogs from going in the water near the site. One person said they do not recommend swimming in the river. There is a fear that people will walk into the tar-like substance.

How has the contamination affected your enjoyment of the area?

Because residents and officials were generally unaware of the Campmarina site prior to the community interviews, the site was not found to impact enjoyment of the area for most of those interviewed, particularly since the Sheboygan River and Harbor Superfund site has been a presence in the area for many years and has resulted in fish advisories.

Contamination in the river affects fish populations and fishing; it has limited the ability to eat fish from the river. Someone mentioned that people are still coming to use the area and are eating the fish. Although they worry about the contamination, some said they still enjoy activities on the river.

Some people do not go in the river or eat the fish because of the contamination. One recreational kayaker would like to use the river but will not kayak there because of the pollution.

Someone involved with the Testing the Water's Program for schools said that the pollution in the river limits testing in the area because of the lessening of living organisms, and because of the liability of having kids going into the water.

When the cleanup is underway, commercial and recreational boaters will be impacted.

What government officials have you interacted with about the site? Do you feel these officials have been responsive to your concerns?

None of the residents and few local officials had talked to state or federal officials about the site. City of Sheboygan officials had had no requests for information about the site. One resident had discussed the issue of the USS Edson with the public works director and the city council and did not feel that his concerns were addressed.

WDNR staff has met with City of Sheboygan Department of Public Health and Human Services about the site. They suggested that EPA go through the Department of Health or the county to stop swimming in the site area.

Several people were pleased that EPA was initiating a public campaign for the site and taking care of the problems at the site. City officials have applied for a brownfield redevelopment grant for the site and are awaiting the response.

How frequently do you think public meetings about the site should be held? Would you attend?

Some suggested meetings held once a year would be sufficient and that quarterly meetings would be too often. A few people believed that twice a year was good or more often if there is news about the site.

If meetings were held about the site, several residents and the majority of officials would attend even if the meeting were just about the Campmarina site. Most people, however, said that because people are aware of work being done for the Sheboygan River and Harbor Superfund site, that meetings that combine updates on both sites would be very beneficial.

Several people recommended that EPA keep in touch with civic, boating and environmental groups in the community to get information out.

Are you interested in receiving more information about the site? If yes, what's the best way to provide that information to you (e-mail, regular mail)?

Everyone was interested in receiving more information about the site. About half of those interviewed preferred e-mail updates while the other half asked to receive their information in the mail.

Someone mentioned that they appreciate fact sheets that are not too long.

It was suggested that local clubs be provided site information for distribution to their membership.

What type of media (e.g., newspaper, Internet, radio) do you rely on for information? What stations and papers do you prefer?

Most people said they rely on the *Sheboygan Press* newspaper for information. The *Sheboygan Falls News, Milwaukee Journal Sentinel, Plymouth Review, Chicago Tribune* (on weekends) and *The Sounder* (a Random Lake weekly) are other newspapers that residents and officials read.

Some people rely on the Internet for news and would rely on EPA's fact sheets. Someone suggested that a fact sheet should tell the story of the MGP sites and why Campmarina is of concern.

Several people said they get their environmental information from the various groups they belong to.

When possible, site information is posted on EPA's Web site. Have you used the EPA Region 5 Web site?

A few of the people had visited the EPA Region 5 Web site, but most were unfamiliar with it. WDNR often refers people to it.

Those who had used EPA's Web site did so to research various subjects including:

- Funding for the area
- The Sheboygan River and Harbor Superfund site
- Outdoor wood burning water stoves
- Background material for classroom study
- Definitions

How interested are you in environmental issues in general?

Several people who were interviewed are interested in environmental issues including

global warming, air and water quality, pollution and acid rain. Some want to be actively involved in getting the Sheboygan River cleaned up. One person works to prevent the spilling of oil into the river.

Are there any other people you think we should talk to about the WPSC Campmarina site?

City officials recommended that the Sheboygan River Basin Partnership be included in conversations about the site. The Sheboygan River Basin Partnership is an alliance of conservation and environmental groups; local businesses; local, state and federal agency staff; and individuals working together on natural resource issues in the Sheboygan River Basin. Several people involved with the Sheboygan River Basin Partnership were included in the community interviews.

Someone suggested that Juan Perez, the mayor of Sheboygan, and Paulette Enders, the city director of planning and development, be consulted. Both were included in the community interviews.

The environmental park director of Ellwood H. May Environmental Park in Maywood was mentioned as someone who should be interviewed, and he was consulted. It also was suggested that James Baumgart, a former Wisconsin state senator and outdoors writer, be consulted. Mr. Baumgart was not a part of the initial community interviews.

Someone suggested that area boating clubs should be consulted and that an area dive team had questions about the risks of being in the water.

A developer suggested EPA should speak to a consulting firm that had studied the area.

Proposed community involvement activities

The next step for EPA is to address the issues, concerns and questions that were expressed about the site. To do this, EPA is proposing to:

Send fact sheets

EPA will mail out fact sheets to those on the site's mailing list as a way to give updates on the site and its activities. The fact sheets will be mailed out periodically to inform the public about upcoming meetings and important technical information.

In addition to sending fact sheets via first class mail, EPA will develop an e-mail distribution list for interested parties who prefer e-mail. The fact sheet will be sent to e-mail recipients as a .pdf file at the same time the fact sheet is mailed. E-mails also will contain a link to EPA's WPSC Campmarina MGP Web site and to the electronic fact sheet.

Hold community meetings

EPA will hold community meetings at key milestones. The meetings will be announced via newspaper notices, e-mail messages and fact sheets.

The Mead Public Library offers a variety of room sizes that can be used based on the anticipated number of attendees. Meeting space at various locations was offered by several of the people interviewed. These spaces will be considered if the library is not available.

A contact list of government officials is in Appendix A.

Stay in contact with key stakeholders

Several people who were interviewed suggested they get their information from the various groups they belong to. These groups, like the Sheboygan River Basin Partnership and the Sheboygan Outboard Club, want to stay informed about the site.

In addition to fact sheets and public meetings, EPA will stay in contact with these groups on a regular basis, even if there is no key milestone on which to report. Based on the importance residents placed on receiving timely information, this will help ensure effective community involvement.

The e-mail distribution list developed for this site could be used to provide regular, concise updates ranging from a few sentences to a few paragraphs.

Maintain information repositories

An information repository was established at the Mead Public Library, 710 N. 8th St., Sheboygan. The repository contains information and documents about the site, including the legally enforceable agreement under which WPSC has agreed to conduct and pay for the cleanup at the site called an Administrative Settlement Agreement and Order on Consent.

Work with local media

EPA staff will continue to be available to local media. The most widely read newspaper in the community is the *Sheboygan Press*. EPA will publish notices in this newspaper prior to any site milestone as appropriate.

Other newspapers that are read by the community including the *Sheboygan Falls News, Milwaukee Journal Sentinel, Plymouth Review,* and *The Sounder* will be provided site information.

Fact sheets and update letters may be provided to Milwaukee and Green Bay media since these media outlets occasionally feature news on Sheboygan.

A contact list of area media services is in Appendix A.

Internet

Since many residents expressed interest in receiving information electronically, EPA will continue to post site information at www.epa.gov/region5/sites/campmarina. Photographs and other site-related information will be added to the Web site as they become available.

Have a presence

EPA's community involvement coordinator and remedial project manager will respond to inquiries from those interested in the site throughout the cleanup. They also will be available to speak to local citizen groups, upon request. EPA's toll-free telephone number and the project staff's direct numbers and e-mail addresses will be included on all community involvement material and are listed in Appendix A.

Appendix A

WPSC Campmarina MGP Site Contact List

Federal Elected Officials

Senator Herb Kohl 330 Hart Senate Office Building Washington, DC 20510-4903

Phone: 202-224-5653 Fax: 202-224-9787

310 W. Wisconsin Ave., #950

Milwaukee, WI 53203 Phone: 414-297-4451 Fax: 414-297-4455

Senator Russ Feingold 506 Hart Senate Office Building Washington, DC 20510-4904

Phone: 202-224-5323 Fax: 202-224-2725

1600 Aspen Commons, Room 100

Middleton, WI 53562 Phone: 608-828-1200 Fax: 608-828-1203

Representative Tom Petri

2462 Rayburn House Office Building Washington, DC 20515-4906

Phone: 202-225-2476 Fax: 202-225-2356

490 W. Rolling Meadows Drive, Suite B

Fond du Lac, WI 54937 Phone: 920-922-1180 Fax: 920-922-4498

State Elected Officials

Governor Jim Doyle P.O. Box 7863 Madison, WI 53707 Phone: 608-266-1212 Fax: 608-267-8983

Senator Glenn Grothman Room 20 S. State Capitol Madison, WI 53707-7882 Phone: 608-266-7513 Fax: 608-267-0590 Senator Joseph Liebham State Capitol, Room 5 S Madison, WI 53707-7882 Phone: 608-266-2056 Fax: 608-282-3549

3618 River Ridge Drive Sheboygan, WI 53083 Phone: 920-457-7367

Representative Terry Van Akkeren 1719 N. 13th St. Sheboygan, WI 53081 Phone: 920-458-4398

Representative Steve Kestell Room 320 E. State Capitol Madison, WI 53708-8952 Phone: 608-266-8530 Fax: 608-282-3627

Representative Daniel R. Lemahieu 17 N. State Capitol Madison, WI 53708-8952 Phone: 608-266-9175 Fax: 608-282-3659

State Agencies

Henry Nehls-Lowe, Epidemiologist Wisconsin Department of Health and Family Services

1414 E. Washington Ave. Madison, WI 53704 Phone: 608-266-3479

E-mail: nehlshl@dhfs.state.wi.us

Victor Pappas, Basin Supervisor Wisconsin Department of Natural

Resources

1155 Pilgrim Road Plymouth WI 53073-4294 Phone: 920-892-8756, ext. 3012

Fax: 920-892-6638

E-mail: victor.pappas@wisconsin.gov

John Feeney, Hydrogeologist

Wisconsin Department of Natural Resources

1155 Pilgrim Road

Plymouth, WI 53073-4294 Phone: 920-892-8756, ext.3023

Fax: 920-892-6638

E-mail: john.feeney@wisconsin.gov

Local Elected Officials

Sheboygan County

Sheboygan County 508 New York Ave.

County Administration Building Sheboygan, WI 53081-4126 Phone: 920-459-3003

Fax: 920-459-4383

E-mail: glancjmg@co.sheboygan.wi.us

Web: www.co.sheboygan.wi.us

County Administrator Adam Payne

Phone: 920-459-3103 Fax: 920-459-3144

E-mail: payneanp@co.sheboygan.wi.us

Dale Hippensteel, Health Officer Sheboygan County Human Services

Division of Public Health

1011 N. 8th St.

Sheboygan, WI 53081-4043 Phone: 920-459-4382

Fax: 920-459-0529

E-mail: hippedah@co.sheboygan.wi.us

Sheboygan County Board

Chairman, William C. Goehring, District 33

Administration Building 3rd Floor, Room 311 508 New York Ave. Sheboygan WI, 53081 Phone: 920-459-3103 Fax: 920-459-3144

E-mail: goehrwcg@co.sheboygan.wi.us

Vice Chairman, Jerald A. Holub, District 17

W711 Orchard Beach Drive Sheboygan, WI 53083 Phone: 920-565-2572

Sheboygan County Board Supervisors

Constance Ziegelbauer, District 1

3816 High Cliff Court Sheboygan, WI 53083 Phone: 920-459-7227 Fax: 920-457-2650

Michael J. Vandersteen, District 2

320 Lincoln Ave.

Sheboygan, WI 53081 Phone: 920-458-7341 Fax: 920-458-1412

E-mail: mjvan320@hotmail.com

Mark S. Winkel, District 3 512 Ontario Ave. Sheboygan, WI 53081 Phone: 920-803-6645

James E. Gilligan, District 4

630 N. 4th St.

Sheboygan, WI 53081 Phone: 920-458-9990

Eustacio P. Medina, District 5

902 S. 14th St.

Sheboygan, WI 53081 Phone: 920-208-2369

James Baumgart, District 6

722 N. 26th St.

Sheboygan, WI 53081 Phone: 920-458-1726

Daniel R. Berg, District 7 932 Broadway Ave. Sheboygan, WI 53081 Phone: 920-452-9719 Fax: 920-452-2009

E-mail: dpberg@powercom.net

William B. Seibold, District 8

620 Whitcomb Ave. Sheboygan, WI 53081 Phone: 920-457-3982

Jacob Van Dixhorn, District 9 4020 Meadowbrook Court Sheboygan, WI 53081 Phone: 920-458-5220

Val Schultz, District 10 1747 Greenfield Ave. Sheboygan, WI 53081 Phone: 920-457-5348

E-mail: vschultz@charter.net

Henry M. Nelson, District 11

1730 Arizona Ave. Sheboygan, WI 53081 Phone: 920-457-6766

Jim Glavan, District 12 2133 S. 16th St. Sheboygan, WI 53081 Phone: 920-452-6599

John Van Der Male, District 13 1803 Arrowhead Court Sheboygan, WI 53083 Phone: 920-458-9449 E-mail: jovan1@charter.net Charles W. Conrardy, District 14

2821 Windepoint Court Sheboygan, WI 53083 Phone: 920-452-3845

Roger R. Otten, District 15

1027 Bell Ave.

Sheboygan, WI 53081 Phone: 920-457-4978

Don Schramm, District 16 1602 Superior Ave. Sheboygan, WI 53081 Phone: 920-452-3459

City of Sheboygan

Mayor Juan Perez City of Sheboygan 828 Center Ave. Sheboygan, WI 53081 Phone: 920-459-3317 Fax: 920-459-3967

Fax: 920-459-3967

E-mail: mayor@ci.sheboygan.wi.us

Aldermen

Eldon Burg, District 1 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: elbur@charter.net

Richard C. Manny, District 1 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: rcmanny@charter.net

Bob Ryan, District 2 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: rjryan6556@sbcglobal.net

Renee Suscha, District 2 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: reneesuscha@yahoo.com

Dan Verhasselt, District 3 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: verhasseltd@yahoo.com

Jean Kittelson, District 3 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: kittel@bytehead.com

Jim Bohren, District 4 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: aldermanjimb@charter.net

James Graf, District 4 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: jjgraf@bytehead.com

Gene Davis, District 5 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: srichards@ci.sheboygan.wi.us

Jeanne Kliejunas, District 5 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: jkliejunas@hotmail.com

Bonnie Cerda, District 6 Phone: 920-459-3361 Fax: 920-459-3967 E-mail: gbcerda@aol.com

Jeff Radtke, District 6 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: jradtke@sbcglobal.net

Mark Hanna, District 7 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: mhanna@maritime-ins.com

Vicky Meyer, District 7 Phone: 920-459-3361 Fax: 920-459-3967

E-mail: vickymeyer@charter.net

Marilyn Montemayor, District 8

Phone: 920-459-3361 Fax: 920-459-3967

E-mail: marilyn@milwpc.com

Silas D. Vander Weele, District 8

Phone: 920-459-3361 Fax: 920-459-3967

E-mail: svanderweele@cs.com

City of Sheboygan Falls

Mayor Randy J. Meyer 375 Buffalo St., P.O. Box 186, Sheboygan Falls, WI 53085 Phone: 920-467-7900 Fax: 920-467-2847

E-mail: randymeyer@charter.net

Joel Tauschek City Clerk

375 Buffalo St., P.O. Box 186, Sheboygan Falls, WI 53085 Phone: 920-467-7900

Fax: 920-467-2847

E-mail: joel@shebfalls.com

EPA

EPA Region 5

77 W. Jackson Blvd. Chicago, IL 60604-3590 Phone: 800-621-8431

Web: www.epa.gov/region5/sites/campmarina

Susan Pastor, P-19J

Community Involvement Coordinator

Phone: 312-353-1325

Toll free: 800-621-8431, ext. 31325 E-mail: pastor.susan@epa.gov

Pablo Valentin, SR-6J Remedial Project Manager Phone: 312-353-2886

Toll free: 800-621-8431, ext. 32886 E-mail: valentin.pablo@epa.gov

Richard Nagle

Assistant Regional Counsel Phone: 312-353-8222

Toll free: 800-621-8431, ext. 38222 E-mail: nagle.richard@epa.gov

Information Repositories

Mead Public Library

710 N. Eighth St. Sheboygan, WI 53081 Phone: 920-459-3400

Media

Newspapers

Editor

Sheboygan Press

632 Center Ave.

Sheboygan, WI 53081 Phone: 920-457-7711 Fax: 920-457-7043

Web: sheboygan-press.com

Jeff Pederson, Editor
The Falls News

P.O. Box 468, Sheboygan Falls, WI 53085

P.O. Box 317, Plymouth, WI 53073 113 E. Mill St., Plymouth, WI 53073

Phone: 920-893-6411 Fax: 920-893-5505

E-mail: fallsnews@excel.net

Editor

Milwaukee Journal-Sentinel

P.O. Box 665

Milwaukee, WI 53201 Phone: 414-224-2000 Fax: 414-224-2047

Ed Culhane

The Post Crescent

P.O. Box 59

Appleton, WI 54912

Editor

The Plymouth Review

P.O. Box 317, 113 E. Mill St. Plymouth, WI 53073

Phone: 920-893-6411 Fax: 920-893-5505

Gary Feider, Editor

The Sounder

405 Second St. P.O. Box 346

Random Lake, WI 53075-0346

Phone: 920-994-9244 Fax: 920-994-4817

Teryl Franklin, City Editor

Wisconsin State Journal

Wisconsin State Journal, P.O. 8058,

Madison, WI 53708 Phone: 608-252-6130.

E-mail: wsjcity@madison.com Web: wsjcity@madison.com

Radio

WJUB / WSTM

N5569 Highway 57, P.O. Box 259 Plymouth, WI 53073-0259

Phone: 920-893-2661 Toll free: 800-246-WJUB Fax: 920-892-2706

E-mail: snoordyk@jmiradio.org Web: 1420thebreeze.com

Web: wstmfm.org

Chuck Quirmbach

WHAD-FM

111 E. Kilbourn Ave., #1650 Milwaukee, WI 53202-66112

Phone: 800-747-7444

WHBL/WWJR

P.O. Box 27

Sheboygan, WI 53081 Phone: 920-458-2107 Fax: 920-458-9775

WISN-AM

12100 W. Howard Ave. Greenfield, WI 53228 Phone: 414-545-8900 Fax: 414-944-5484

WTMJ-AM

P.O. Box 620

Milwaukee, WI 53201 Phone: 414-967-5310 Fax: 414-967-5492

WEMP-AM / WMYX-FM / WXSS-FM

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WNOV-AM

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WVCY-FM

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WYMS-FM

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Television

WDJT-TV CBS58

809 S. 60th St. Milwaukee, WI 53214 Phone: 414-777-5800 Fax: 414-777-5802

WITI-TV

9001 N. Green Bay Road P.O. Box 17600 Milwaukee, WI 53217 Phone: 414-355-6214 Fax: 414-362-2141

WISN TV

P.O. Box 402 Milwaukee, WI 53201-0402 Phone: 414-937-3331 Fax: 414-342-7505

E-mail:

wisntvnews@TheMilwaukeeChannel.com

WVCY-TV

3434 W. Kilbourn Ave. Milwaukee, WI 53208 Phone: 414-935-3000 Fax: 414-935-3015

E-mail: vcy@vcyamerica.org

WCGV-TV / WVTV-TV

4041 N. 35th St. Milwaukee, WI 53216 Phone: 414-442-7050 Fax: 414-203-2300

WLUK TV

787 Lombardi Ave. Green Bay, WI 54304 Phone: 920-490-1407 Fax: 920-494-9109

WGBA-TV

1391 North Road Green Bay, WI 54313 Phone: 920-494-2626 Toll free: 800-800-6619 Fax: 920-494-9550

WBAY-TV

115 S. Jefferson St. Green Bay, WI 54301 Phone: 920-739-3260 Fax: 920-432-1190

WFRV-TV, CBS 5

P.O. Box 19055

Green Bay, WI 54307-9055 Phone: 800-236-5550