From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>

Sent: Wednesday, September 22, 2021 2:31 PM

To: Krueger, Sarah E - DNR

Cc: Andrew G Cawrse (Andrew.Cawrse@ramboll.com); Prasad, Narendra M
Subject: Former We Energies Appleton MGP Site - Response to WDNR 8/9/21

Notification Letter

Attachments: Appleton MGP Lawrence University Response Letter_Final.pdf

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Hi Sarah,

Per my vmail from earlier today, please find attached our response to the above referenced correspondence from the Department. As always, please feel free to contact me with any questions.

Thanks,

Frank Dombrowski Principal Environmental Consultant

WEC Energy Group - Business Services Environmental Dept. - Land Quality Group 333 W. Everett St., A231 Milwaukee, WI 53203

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September 22, 2021

Ms. Sarah Krueger Water Resources Management Specialist Wisconsin Department of Natural Resources 2984 Shawano Avenue Green Bay, WI 54313

RE: Notification of Related Groundwater Data Former We Energies Appleton MGP Site, 337 Water St., Appleton, WI BRRTS Activity No. 02-45-000042

Dear Ms. Krueger:

On August 9, 2021, we received a "Notification of Related Groundwater Data" letter from Wisconsin Department of Natural Resources (WDNR). The letter states that elevated concentrations of benzene, naphthalene, and ethylbenzene identified in the groundwater at the Lawrence University Academy of Music Property (Bureau for Remediation and Redevelopment Tracking System [BRRTS] Activity No. 02-45-582612) is related to the former We Energies Appleton Manufactured Gas Plant (MGP) site.

We have reviewed historical information for the Lawrence University property as well as the available documentation for the BRRTS case that was prepared by Westwood Infrastructure, Inc (Westwood), and we are unable to understand how the available anecdotal and quantifiable data support the Department's conclusion that the impacts identified at this property are associated with the former Appleton MGP site. Based on a thorough review of the available information, we note the following:

- There have never been MGP operations on the Lawrence University property. Review of historical aerial photographs and Sanborn maps indicate that the property was developed with a warehouse, saloon, and office building from at least 1886 through 1911. The present day building was constructed in 1942 and was originally utilized as an office building for the Fox River Paper Corporation. This building has been used by Lawrence University since the 1980s. Attached are historical Sanborns and aerials for your review.
- Review of the Westwood reports indicates that there is another source of volatile organic compound (VOC) contamination on the Lawrence university property including, petroleum-based VOCs. This is based on the following results:
 - Benzene groundwater pathway Residual Contaminant Level (RCL) exceedances were detected primarily in the shallow soil samples collected 0-4 feet below ground surface (bgs).
 - Naphthalene, which along with benzene may be a constituent characteristic of MGP-related impacts, was detected in one soil sample (SB303 14-16) at concentrations exceeding the groundwater pathway RCL and non-industrial direct contact RCL. This sample was collected from 14-16 feet bgs, which is below the groundwater table observed at that boring location.
 - Review of the boring log for SB303 indicates that foundry sand, staining, sheen, high
 photoionization detector (PID) readings, and petroleum odors were identified in the fill
 material from 13.0-13.5 feet bgs. These observations further indicate that impacted historic
 fill material is present at the property and is the likely source of the naphthalene soil RCL
 exceedances observed at this location. In addition, well MW-3 was completed at SB303

and is screened from 4 to 16 feet bgs across the impacted fill material interval, indicating that the impacted fill material is the likely source of groundwater contamination observed at well MW-3. The boring log for SB303 is attached for reference.

The Westwood reports state that significant filling has taken place at the property and that the source of the fill material is unknown. Based on review of the available information, the VOC impacts at the Lawrence University property are mostly located in the shallow (vadose zone) fill material (0-4 feet bgs) which indicates that these impacts are likely due to the contaminated historic fill material and/or historic operations at this property and are not associated with the release at the former Appleton MGP site. The Lawrence University VOC soil analytical results table is attached for reference. Exceedances are highlighted yellow and circled in red on the table.

- The groundwater elevation at well MW-3 on the Lawrence University property was 720.79 on September 10, 2020 and was 720.85 on May 26, 2021. These elevations are higher than the water level elevations typically observed at either well MW-22, which is located on the former MGP property to the southwest, or well MW-24, which is located in the Water Street ROW to the east. This indicates that well MW-3 is hydraulically up-gradient of these two wells. Review of the Westwood reports further indicates that the groundwater at the Lawrence University property is flowing towards the Fox River. Based on this information, it appears that MW-3 is up-gradient of the extent of MGP impacts, making it highly unlikely that it could have been impacted by any dissolved phase plume originating from the former MGP property. Please note that no similar impacts were documented in the other wells installed on the property, despite them being within feet of MW-3.
- Groundwater samples collected from the Lawrence University property were not collected concurrently with samples collected from the former Appleton MGP. The groundwater sampling was conducted at the Lawrence University property in September 2020 and May 2021 while the groundwater sampling was conducted at the former Appleton MGP site in April 2020 and April 2021. In addition, it is unknown if the groundwater sampling at the Lawrence University property was conducted with the same methodology, data quality objectives and standard operating procedures as the sampling completed at the former Appleton MGP site. As such, this data is not comparable with the project SI data set.

Based on our review of the historical information and documentation available for the Lawrence University BRRTS case, we do not understand how the results of the investigations at the Lawrence University property demonstrate that dissolved phase impacts from the former MGP facility have impacted the well in question. Significant use of historic fill has taken place at this property and the impacts identified in groundwater at this property have potential on-site sources as evidenced by the non-industrial direct contact and soil to GW pathway exceedances observed by Westwood. Review of the boring log for SB303 indicates that foundry sand, staining, sheen, high PID reading, and petroleum odors were identified within the screen interval of well MW-3 which further indicates that impacted historic fill material is present at the property and is likely responsible for observed groundwater exceedances at this location. Moreover, the data Lawrence University's consultant provided indicates that this well is hydraulically upgradient of our monitoring wells which have historically been utilized to document the dissolved phase plume in the area.

Ms. Sarah Krueger September 22, 2021 Page 3

I am respectfully requesting a call with you to discuss the information included in this letter supporting the fact that the contamination on the Lawrence University property is not related to the MGP as WDNR suggests. In the interim, please do not hesitate to contact me at (414) 221-2156 or via email at frank.dombrowski@wecenergygroup.com if you have any questions or if further information may be needed.

Sincerely, Mandon Manda

Frank Dombrowski

Principal Environmental Consultant WEC Energy Group – Business Services

Environmental Dept.

Enclosures: Attachment A. Historical Aerials

Attachment B. Historical Sanborn Maps

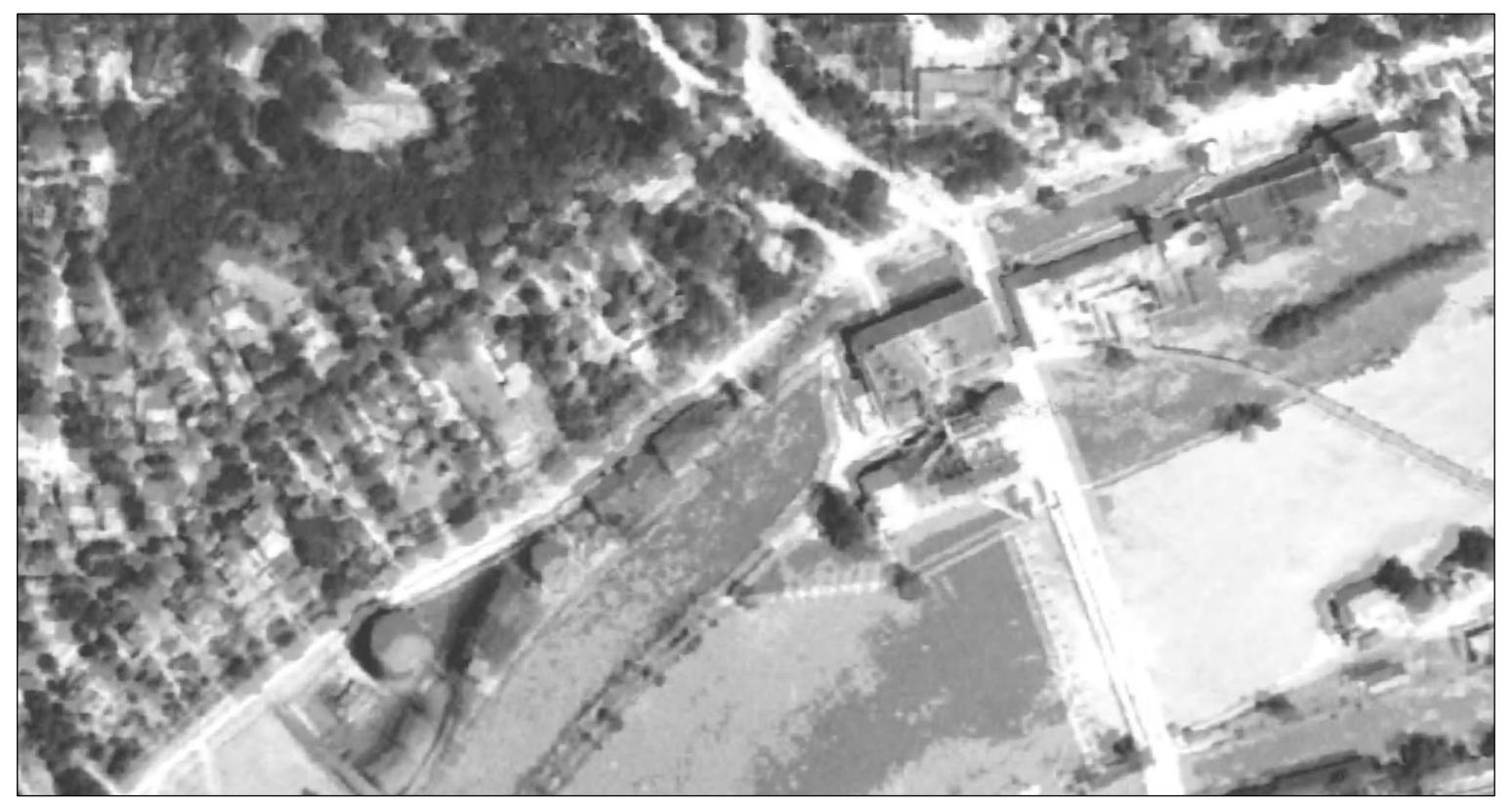
Attachment C. Table 1 – Soil Analytical Results Detected Volatile Organic Compounds

Attachment D. Boring Log for SB303

CC: Project File

A. Cawrse, Ramboll B. Hennings, Ramboll

ATTACHMENT A HISTORICAL AERIALS





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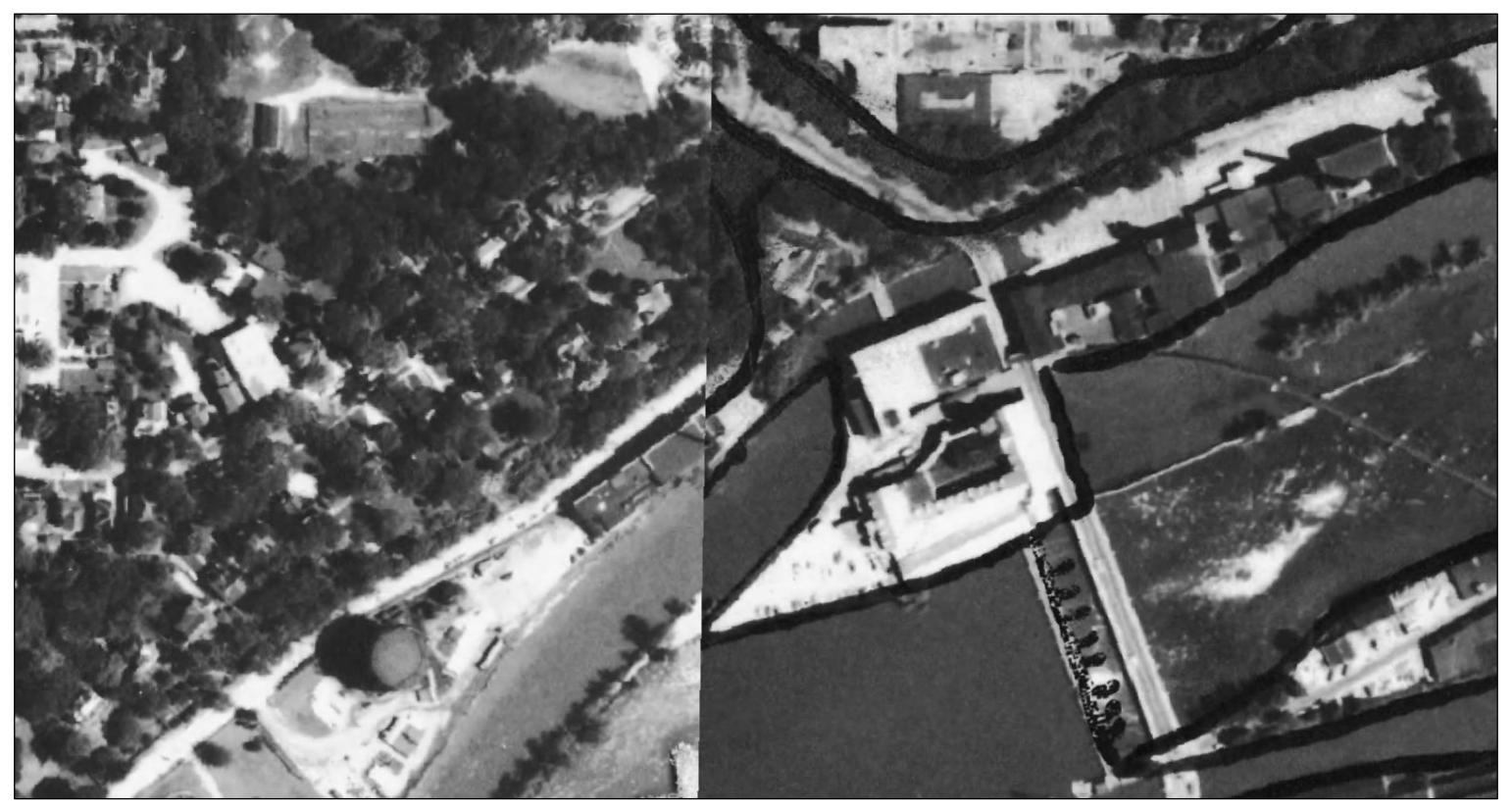
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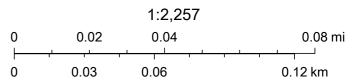
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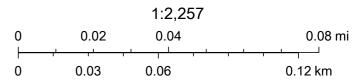


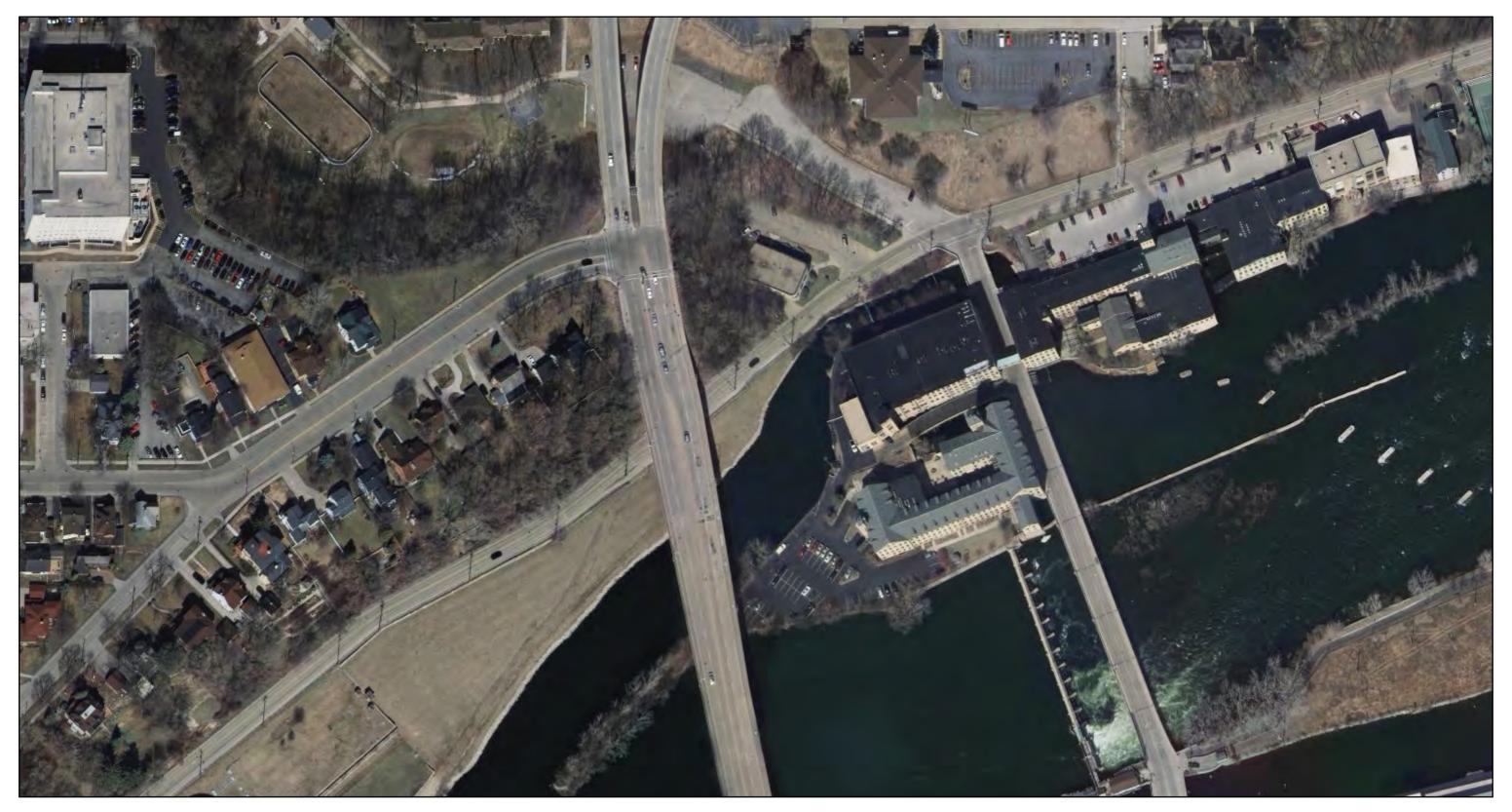
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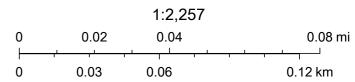


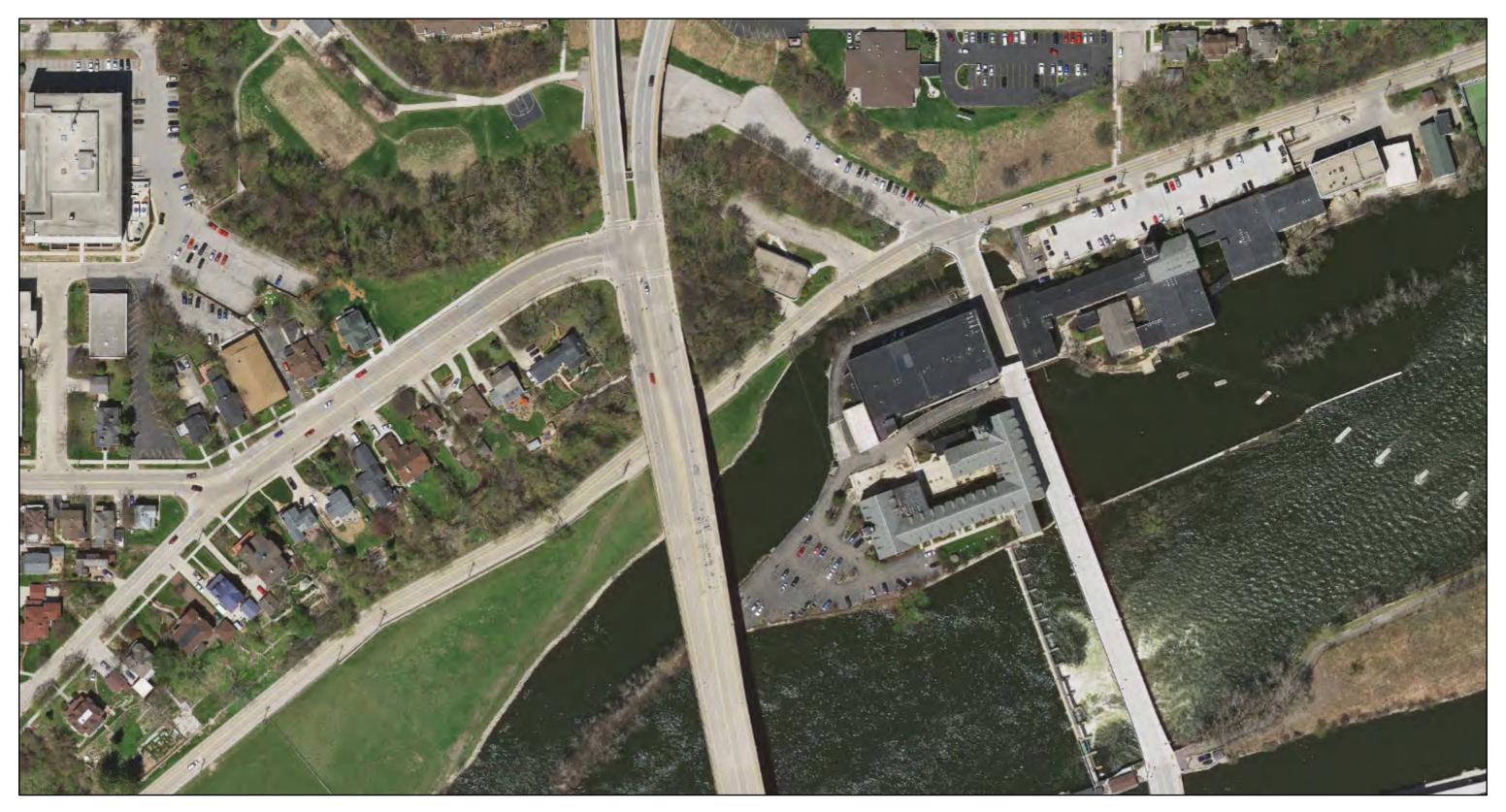
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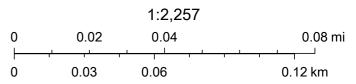


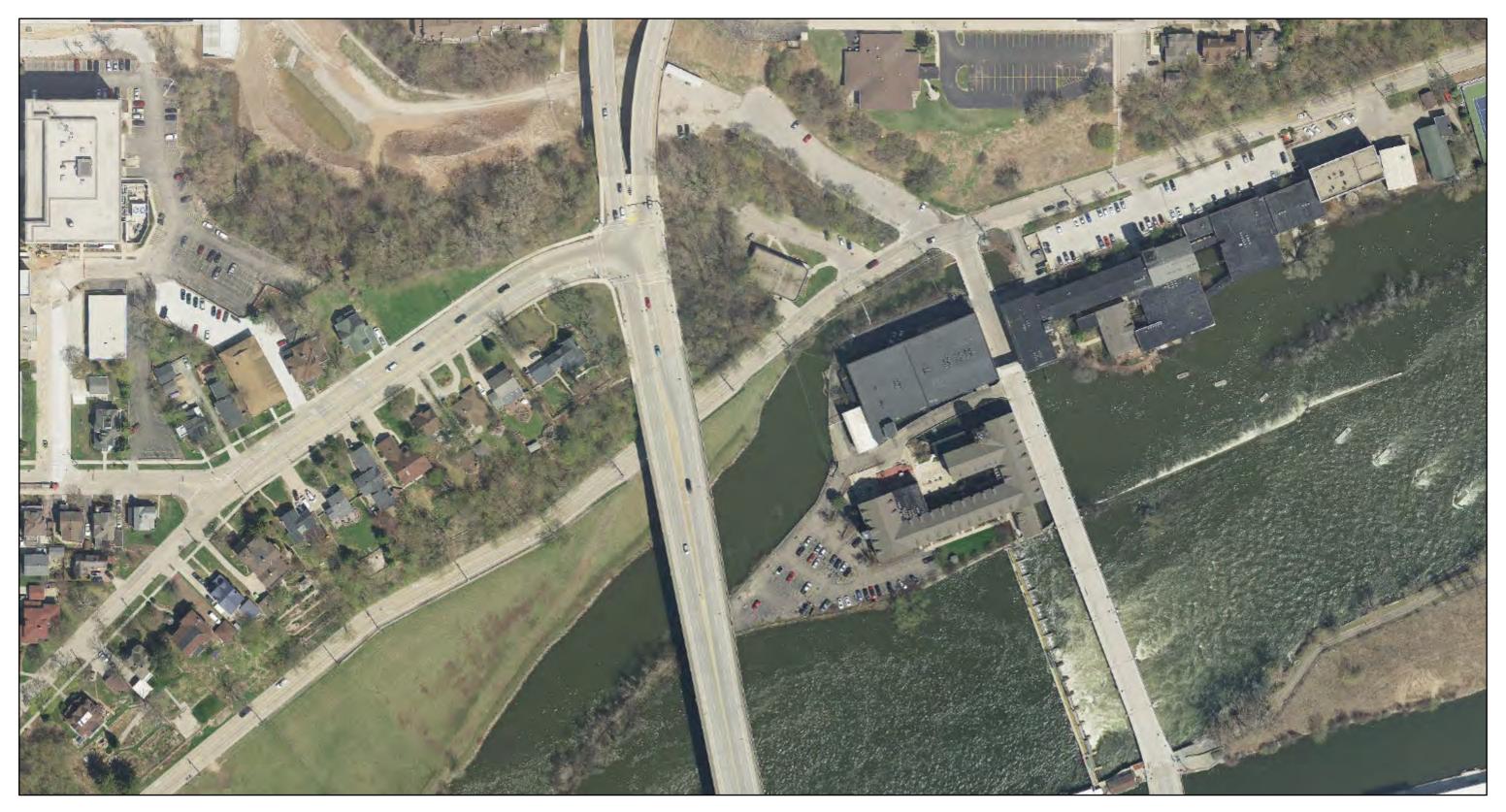
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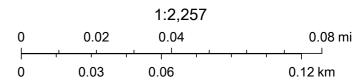


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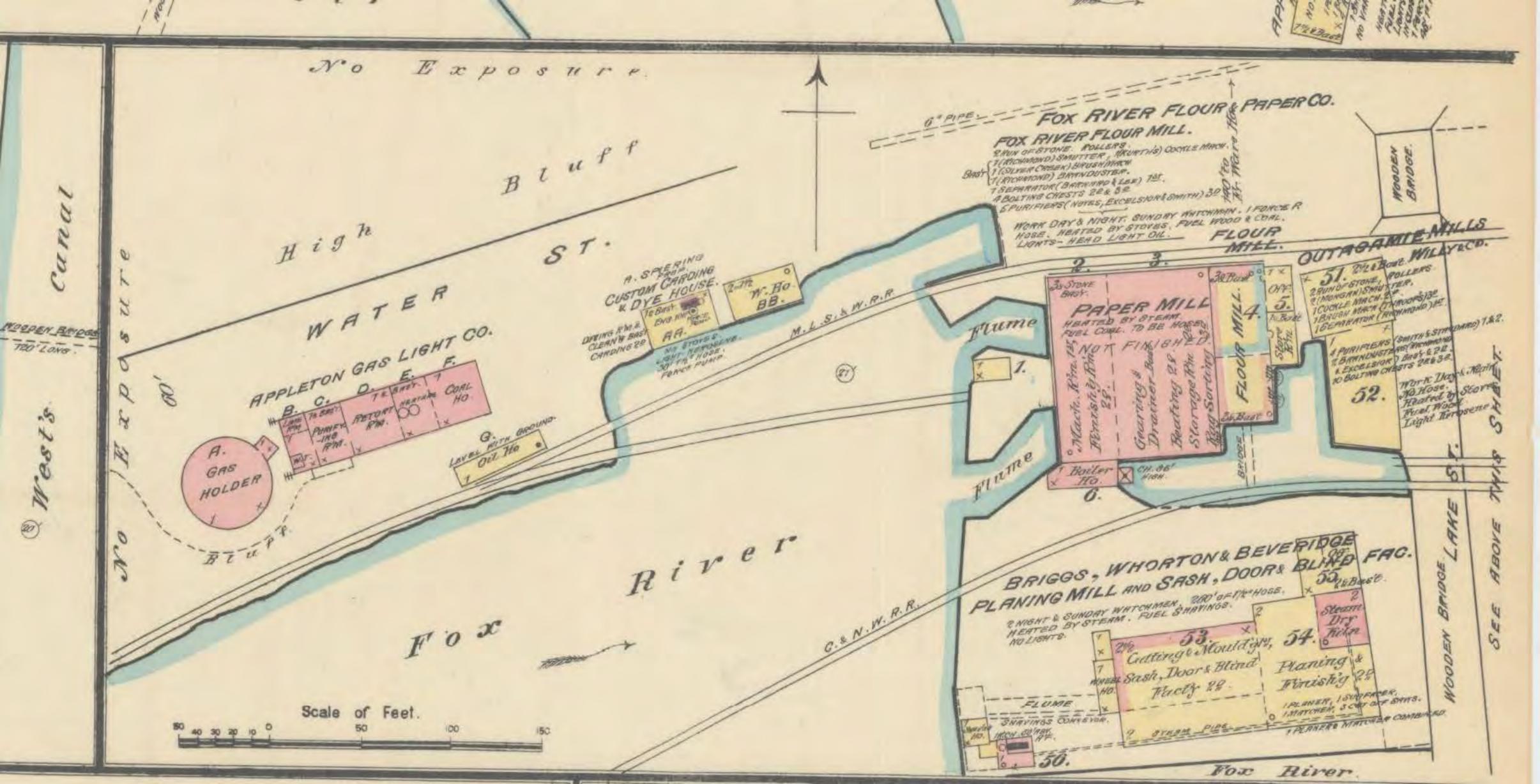


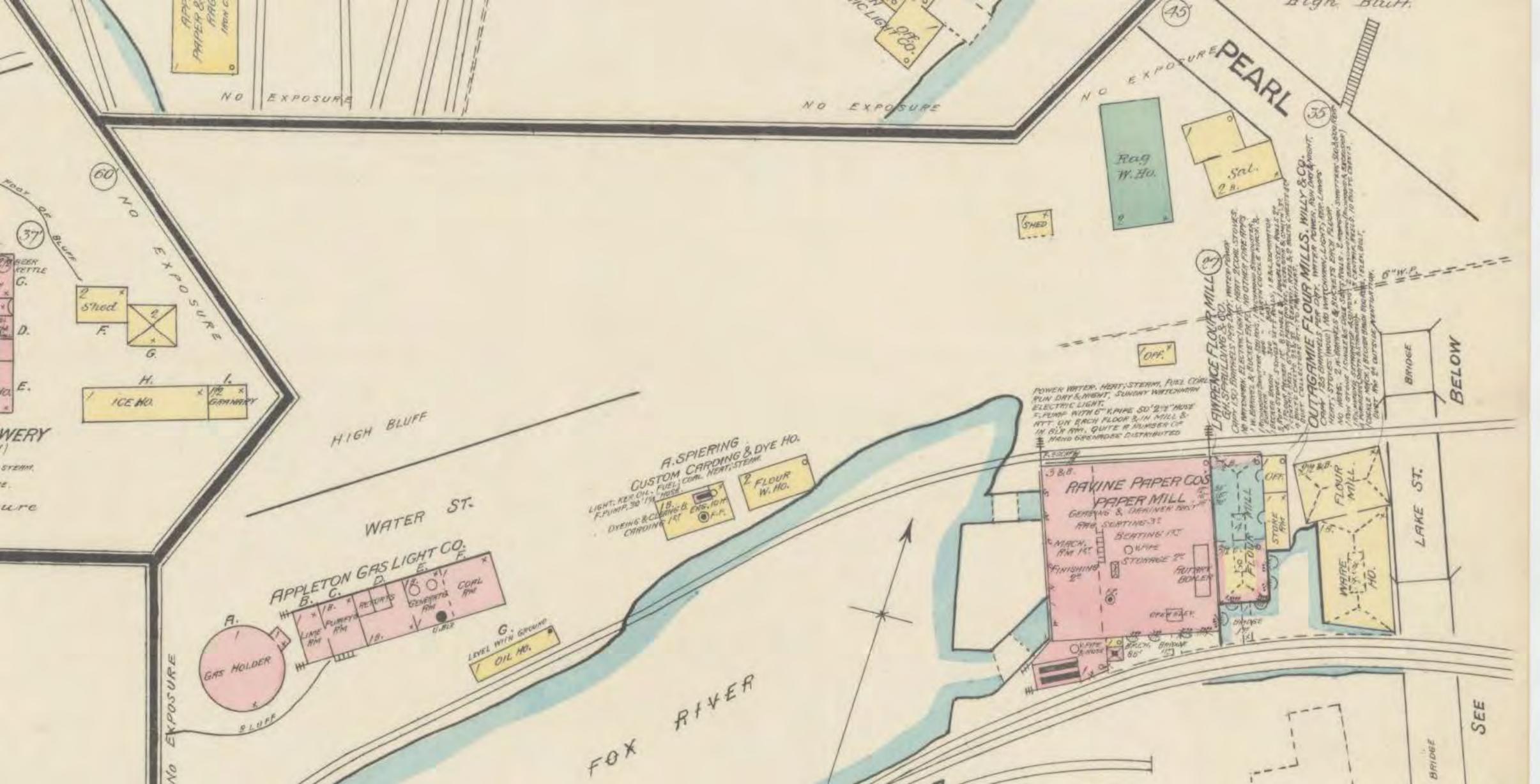


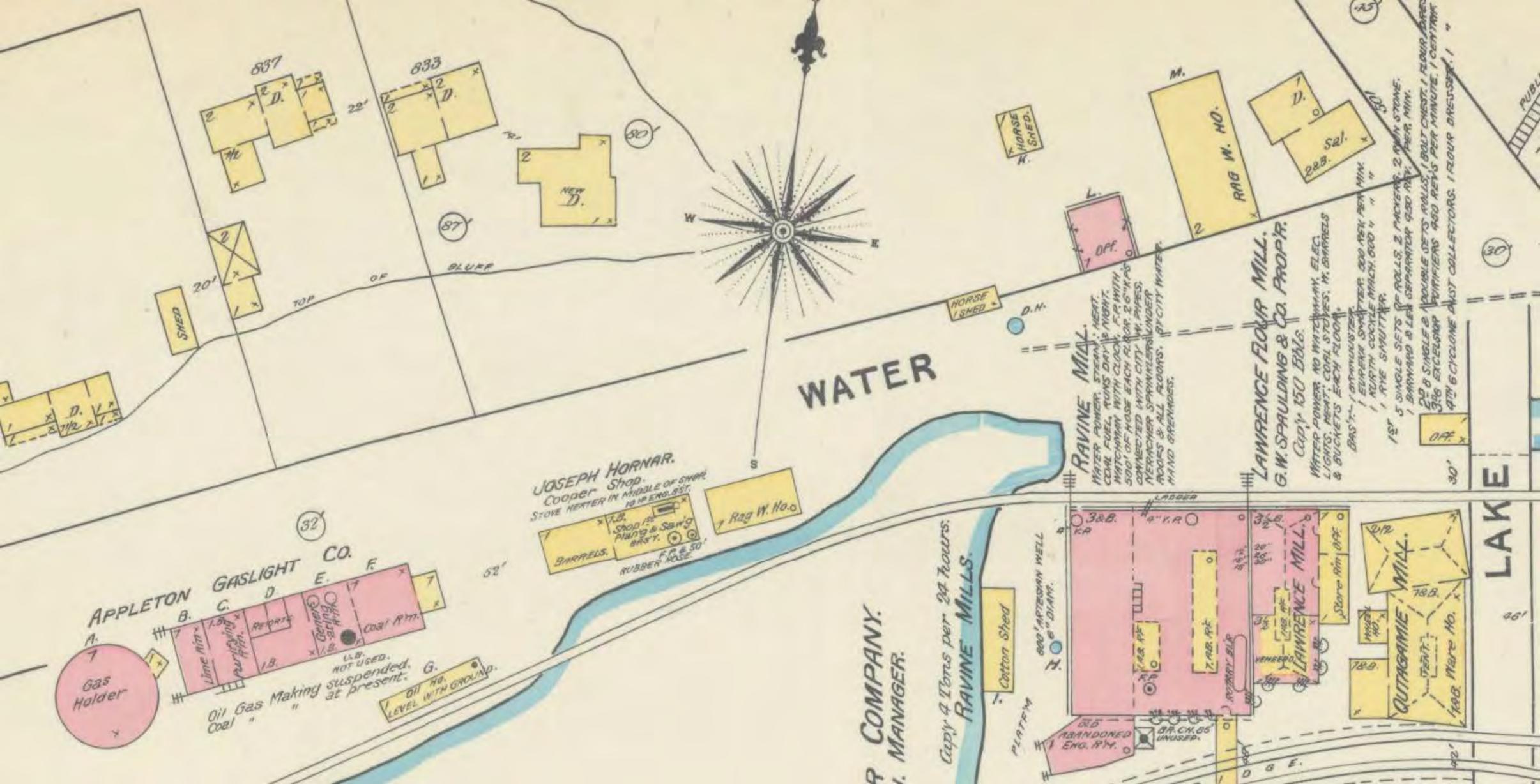
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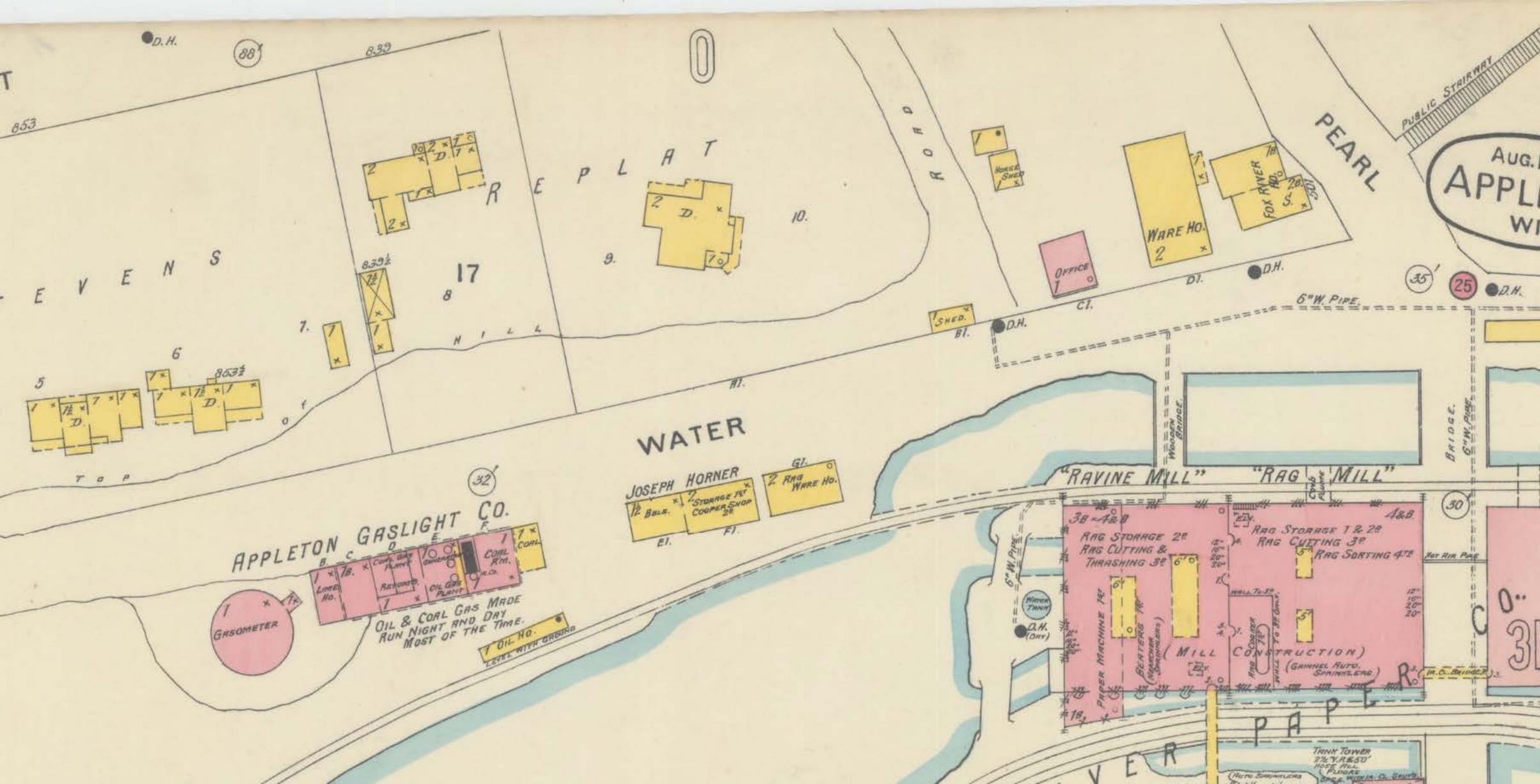


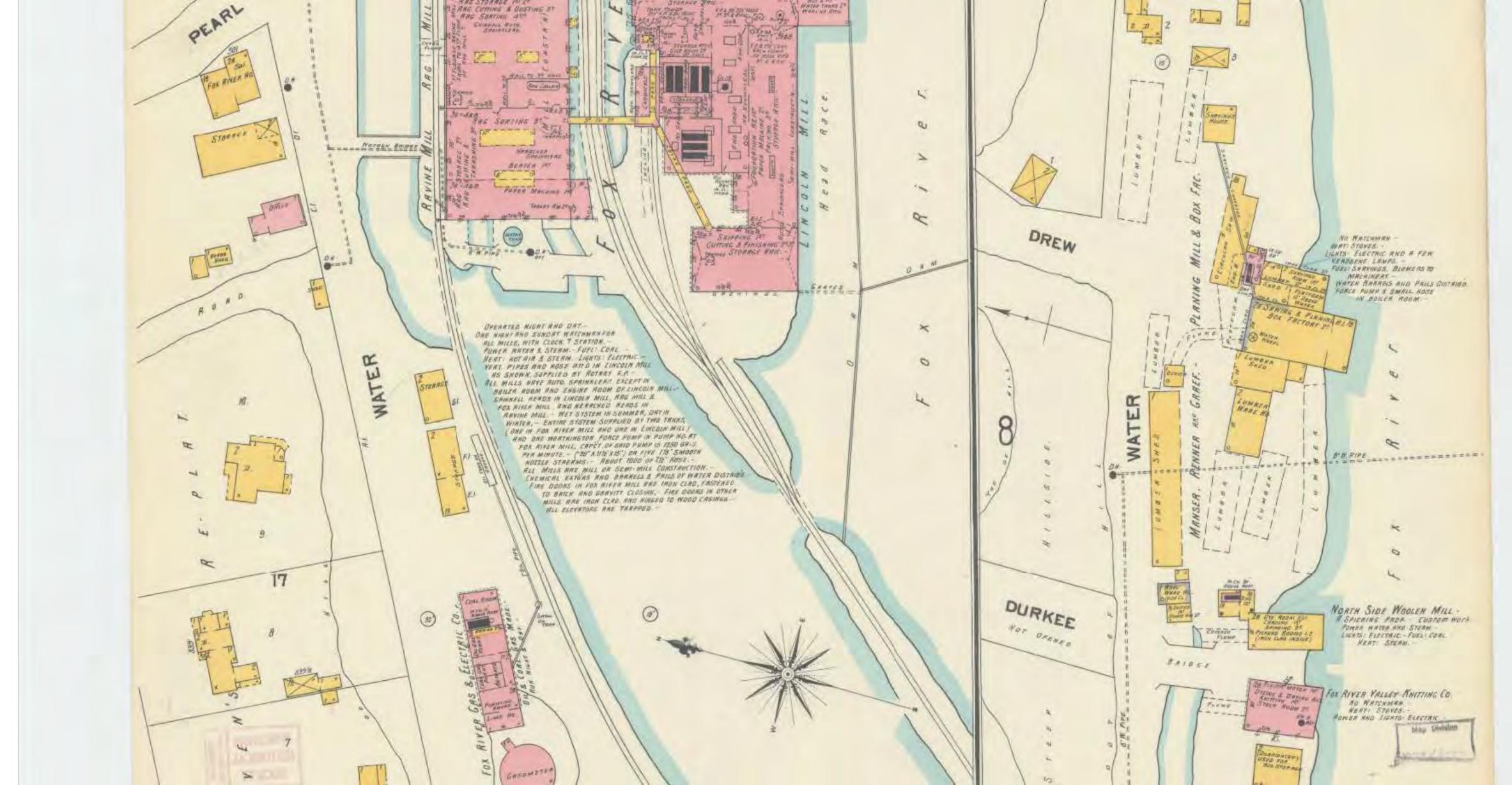
ATTACHMENT B HISTORICAL SANBORN MAPS

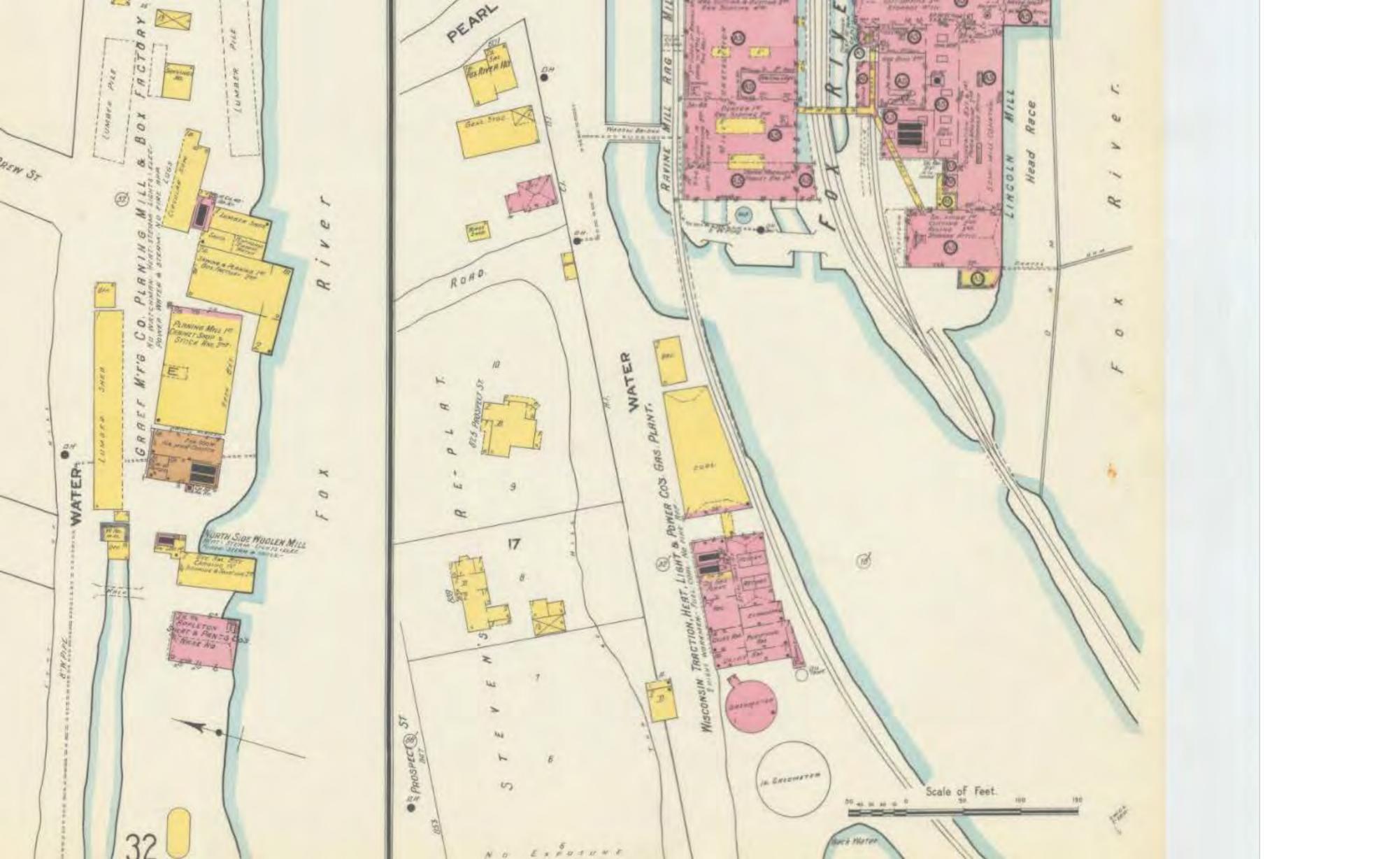












\mathbf{A}^{r}	TTACHMENT C	
TABLE 1 – SOIL ANALYTICAL RESUL	TS DETECTED VOLATILE ORGANIC COMPOUNDS	

Lawrence Univ. Academy of Music Property

BRRTS #02-45-582612

Table 1 - Soil Analytical Results

Detected Volatile Organic Compounds (VOC) (mg/kg)

Chemical Name Non-Industrial Dire	ect Contact	RCL	ethylbenzene	n-Propylbenzene	n-Butylbenzene	ន្ត 1,3,5-Trimethylbenzene	Tolnene 818	ಜ Tetrachloroethene	Sec-Butylbenzene	m&p-Xylene	9. Benzene	Sc Naphthalene	aualXx-o 434	5 1,2,4-Trimethylbenzene	89 Isopropylbenzene	p-Isopropyltoluene
Industrial Direct Contact RCL			35.4	264	108	182	818	145	145		7.07	24.1	434	219	268	162
Soil-to-Groundwater Pathway RCL		/ RCL	1.57				1.1072	0.00454			0.00512	0.658182				
Sample	Depth	Date	100-41-4	103-65-1	104-51-8	108-67-8	108-88-3	127-18-4	135-98-8	179601-23-1	71-43-2	91-20-3	95-47-6	95-63-6	98-82-8	99-87-6
SB303 14-16	14-16'	8/3/2020	0.46	0.172	0.212	0.194	< 0.032	< 0.04	0.0288 J	0.38	0.0264 J	7.6	0.188	0.66	0.264	0.098
SB304 2-4	2-4'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	< 0.04	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB304 6-8	6-8'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	< 0.04	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB305 2-4	2-4'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	0.06 J	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB305 6-8	6-8'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	< 0.04	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB306 2-4	2-4'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	< 0.04	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB306 8-10	8-10'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	0.06 J	< 0.04	< 0.024	< 0.083	< 0.015	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB307 1-2	1-2'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	< 0.032	< 0.04	< 0.024	< 0.083	0.0165 J	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
SB307 3-4	3-4'	4/6/2021	< 0.019	< 0.019	< 0.018	< 0.017	0.045 J	< 0.04	< 0.024	< 0.083	0.144	< 0.12	< 0.028	< 0.054	< 0.025	< 0.026
HA401 1	1-1'	10/21/2020	< 0.019	< 0.019	< 0.018	< 0.017	0.18	< 0.04	< 0.024	0.091 J	0.57	< 0.12	0.044 J	< 0.054	< 0.025	< 0.026
HA401 2.5	2.5-2.5'	10/21/2020	0.033 J	< 0.019	< 0.018	< 0.017	0.114	0.056 J	< 0.024	0.106 J	0.214	0.144 J	0.037 J	< 0.054	< 0.025	< 0.026

December 2018 State of Wisconsin Soil Residual Contaminant Levels (RCL) were used.

RCL = residual contaminant level.

BOLD entries indicate that concentration detected above RCL.

J = Analyte detected between the limit of detection and limit of quantitation.

mg/kg = Miligrams per kilogram

DC = Direct Contact

< = Less than

VOC = Volatile organic compounds

Detects with no exceedances above RCLs

Non-Industrial DC RCL exceedance

Industrial DC RCL exceedance

Soil-to-Groundwater Pathway RCL exceedance

ATTACHMENT D BORING LOG FOR SB303

State of Wisconsin Department of Natural Resources

SOIL BORING LOG INFORMATION

Form 4400-122 Rev. 7-98

			<u>Rc</u>	ute To:		ed/Wastewater tion/Redevelop			e Manag	ement									
															Pag	ge 1	of	2	
Facility/Project Name									License/Permit/Monitoring Number Boring Number SB303										
Lawrence University Academy of Music Boring Drilled By: Name of crew chief (first, last) and Firm								- Date I	- Date Drilling Started Da						npleted		Drilling Method		
Tony Kapugi									8/3/2020					8/3/2	G	Geoprobe/Direc			
On-site Énvironmental Services WI Unique Well No. DNR Well ID No. Common Well Name							Final S	Static Wa		el	Surfac	e Eleva			Push chole Diameter				
MW-3							72	23.3 Fe	et MS	L		731.3			2.0 inches				
Local Grid Origin □ (estimated: □) or Boring Location □ State Plane 561,158 N, 827,629 E S / ②/ N									Lat44			31.9"	Local C			□ E			
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		_2.0																	
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This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

Form 4400-122A

Borin	ng Numb	er	SB3	Use only as an attachment to Form 4400-1	22.						Pag	ge 2	of	2
Sar	nple									Soil	Prope	rties		
	Length Att. & Recovered (in)	ts	et	Soil/Rock Description					e e					
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S-3 CS	60 36		Ē ,, ,	\sand, very soft, very moist. Fill.				0.6						
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			13.0	SAND, dark brown with black staining,	SW									
			13.5	foundry sand, petroleum odor, sheen on		<i>````</i>								
			14.0	water, very soft, wet. Fill. From 13.5-14.5 feet silty clay, brown, very	CL			200.2						SB303
			E 14.5	soft, very moist.				200.2						14-16'
			E-15.0	From 14 5-15 feet boulder BL	DRCB	13								collected at 2:19PM
S-4 CS	60 60		Ė I											
			15.5		SW	*****								
			16.0	SILTY SAND, reddish brown, intermixed	<u> </u>			32.2						
			16.5		SM									
			17.0	D 1 17.5 / 6 1 1										
			E 17.5	Below 1 / Ieet, no foundry sand.	SM									
			Ė I		Sivi									
			18.0	SAND, brown, some silt, and gravel, soft,				1.5						SB303 18-20'
			18.5	wet.	SP-SM									collected at
			19.0	SILTY CLAY, brown, some sand, trace	CI									2:25PM
			19.5	gravel, soft, wet.	CL									
			E-20.0	SAND AND GRAVEL, tan, stiff, wet.	SW	*****								
			20.0	End of boring at 20 feet.										
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