

**From:** Krueger, Sarah E - DNR  
**Sent:** Tuesday, June 13, 2023 7:46 AM  
**To:** Dombrowski, Frank J; Lauridsen, Keld B - DNR  
**Cc:** Andrew G Cawrse (Andrew.Cawrse@ramboll.com)  
**Subject:** RE: Former WPS Appleton MGP - Monitoring Well Abandonment

Good Morning Frank,

MW-09 can be abandoned, and at this time not replaced as the well did not historically have impacts. Being that MW-09 is one of the upgradient wells, hasn't been sampled for SVOCs or VOCs since 1997, and MW-08 had a PAL exceedance (1.8 ppb Benzene) in the last round of sampling from 2012 I recommend collecting a final round of sampling prior to abandoning MW-09. The sampling could occur immediately prior to abandonment. Please be aware that there may be a need in the future to have a well installed in the vicinity of the former MW-09 location.

Thank you,  
Sarah

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Sarah Krueger, P.G.

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**From:** Dombrowski, Frank J <[frank.dombrowski@wecenergygroup.com](mailto:frank.dombrowski@wecenergygroup.com)>  
**Sent:** Monday, June 12, 2023 2:34 PM  
**To:** Krueger, Sarah E - DNR <[sarah.krueger@wisconsin.gov](mailto:sarah.krueger@wisconsin.gov)>; Lauridsen, Keld B - DNR <[Keld.Lauridsen@wisconsin.gov](mailto:Keld.Lauridsen@wisconsin.gov)>  
**Cc:** Andrew G Cawrse ([Andrew.Cawrse@ramboll.com](mailto:Andrew.Cawrse@ramboll.com)) <[Andrew.Cawrse@ramboll.com](mailto:Andrew.Cawrse@ramboll.com)>  
**Subject:** Former WPS Appleton MGP - Monitoring Well Abandonment

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Hi Sarah and Keld,

We reviewed the monitoring well network at the former Appleton MGP site (BRRTS #: 02-45-000042) to determine if any wells at the site can be abandoned in order to prevent them from being damaged/lost due to the new park operations. Based on the review, we are requesting to abandon well MW-09. The following background information has been provided for MW-09:

- MW-09 was installed in approximately 1995 on the southeast side of West Water Street on the former WWTP property (see attached Figure 2). We were unable to locate information (boring logs, well construction forms, etc.) related to the installation of MW-09.
- The total depth of MW-09 is around 15 feet with a 10 foot well screen which is similar to shallow well MW-08 located 100 feet to the northeast (see attached Figure 2). Both wells MW-09 and MW-08 monitor shallow groundwater upgradient of the former MGP Site.
- MW-09 was sampled for VOCs and SVOCs in 1996 and 1997. VOCs were not detected either year. The only SVOC detected in 1996 was BEHP which was detected at concentrations (8.5 ug/L) exceeding the ES. SVOCs, including BEHP, were not detected in the sample collected in 1997.
- MW-09 was sampled for chloride, cyanide, sulfate, and field parameters from 2001 through 2003.
  - o Cyanide was detected at concentrations below the PAL.
  - o Sulfate was detected at concentrations above the PAL but below the ES.
  - o Chloride was detected at concentrations above the ES.
- NAPL has not been observed in MW-09.
- MW-09 is one of three wells (along with MW-8 and -19S) north of the Fox River Canal that are only being monitored for groundwater elevations. Elevations continue to be collected to monitor groundwater in the shallow subsurface outside of the ISS Treatment Area (see attached Figure 2).

Justification for abandoning MW-09:

- VOCs were not detected during the groundwater sampling events. In addition, NAPL has not been observed in this well.
- MW-09 is only used for water levels, no groundwater parameters are analyzed at this well. Nearby well MW-08 also monitors shallow groundwater and water levels will continue to be collected from this well.
- The water level information collected from MW-09 is not used for creating groundwater contours provided in the Annual Reports for the site.

Based on the above information, it is our opinion that well MW-09 may be abandoned without replacement and are therefore requesting WDNR's approval to proceed with well abandonment. The well abandonment is tentatively scheduled for July 10<sup>th</sup> but the driller may have availability on June 27<sup>th</sup> so a timely response would be much appreciated. Please feel free to contact me with any questions.

Thanks,

*Frank Dombrowski*  
*Principal Environmental Consultant*

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