



Wisconsin Public Service Corporation

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January 15, 2019

Ms. Sarah Rolfes
Remedial Project Manager
United States Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

**RE: December 2018 Monthly Progress Report
Green Bay Former Manufactured Gas Plant
Green Bay, Wisconsin
Wisconsin Public Services Corporation
CERCLA Docket No. V-W-06-C-847, CERCLIS ID – WIN000509948**

Dear Ms. Rolfes:

Wisconsin Public Services Corporation (WPSC) is providing this monthly progress report for the WPSC Former Green Bay Manufactured Gas Plant (MGP) Site.

1) PROGRESS MADE DURING THE PAST MONTH

- Prepared and submitted November 2018 Monthly Progress Report to United States Environmental Protection Agency (USEPA) by December 15, 2018.
- Participated in North Focus Area (NFA) Design Work Groups.
- Issued third party notification to Wisconsin Department of Natural Resources (WDNR) and respective property owners on groundwater monitoring results.

2) ANALYTICAL AND OTHER TESTING RESULTS RECEIVED

- Air monitoring analytical data were received November 28th and December 3rd are tabulated and attached.

3) PROJECTED WORK

WPSC Actions

- Submit South Focus Area Remedial Action Completion Report in January 2019.
- Submit monthly progress report to USEPA by the 15th of the month.
- Prepare for remedial investigation (RI) data summary discussion and completion of RI report pending USEPA approval to proceed.
- Participate in work group meetings with USEPA to discuss the NFA Design.

USEPA Actions

- Participate in work group meetings to discuss NFA Design.
- Prepare for RI data summary discussion and completion of RI report.

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4) PROBLEMS OR POTENTIAL PROBLEMS ENCOUNTERED

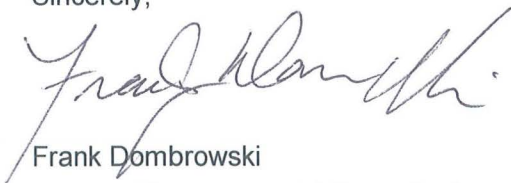
- Ongoing evaluation of replacement or abandonment of monitoring well MW402R, which was inaccessible during the November semiannual groundwater monitoring event due to asphalt pavement covering the top of the flush mount well.

5) ACTUAL OR PLANNED RESOLUTION OF PROBLEMS OR POTENTIAL PROBLEMS

- Replacement of monitoring well MW402R or a request for removal of MW402R from the groundwater monitoring network is currently being evaluated.

If you have any questions, please don't hesitate to contact me at (414) 221-2156 or via email at frank.dombrowski@wecenergygroup.com.

Sincerely,



Frank Dombrowski
Principal Environmental Consultant
WEC Business Services – Environmental Dept.

Enclosures: Table 1a. Baseline Air Monitoring Results Summary
 Table 1b. Performance Air Monitoring Results Summary
 Figure 1 Air Monitoring Station Location Map

For distribution to: Ms. Cheryl Bougie, WDNR (via email)
 Ms. Jennifer Knoepfle, Jacobs (via email)
 Mr. William Fitzpatrick, WDNR (via email)
 Mr. Tauren Beggs, WDNR (via email)
 WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)
 Ms. Staci Goetz, OBG, Part of Ramboll (via email)



Tables

Table 1a. Baseline Air Monitoring Results Summary

Former Green Bay MGP Sediment

Green Bay, WI

BRRTS#: 02-05-000254

UPSEPA#: WIN000509948

9-digit Code	Sample Location	Wind Orientation	Field Sample ID	Sample Date	VOC		VOC		VOC		VOC		VOC	
					Benzene	Ethylbenzene	Naphthalene	Toluene	Xylenes, Total					
Reporting Units:					µg/m ³		µg/m ³		µg/m ³		µg/m ³		µg/m ³	
					Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
071718002	AMS-1	Upwind	AMS-1-20180717	07/17/2018	0.38	J	< 0.32	U	< 1.6	U	1.1		0.61	J
071718001	AMS-2	Upwind	AMS-2-20180717	07/17/2018	0.32	J	< 0.32	U	< 1.6	U	0.88		< 0.61	U
071718003	AMS-3	Downwind	AMS-3-20180717	07/17/2018	0.33	J	< 0.32	U	< 1.6	U	0.83		< 0.61	U
071818004	AMS-1	Downwind	AMS-1-20180718	07/18/2018	0.34	J	< 0.32	U	< 1.6	U	1.4		< 0.61	U
071818005	AMS-2	Upwind	AMS-2-20180718	07/18/2018	0.28	J	< 0.32	U	< 1.6	U	0.58	J	< 0.61	U
071818006	AMS-3	Upwind	AMS-3-20180718	07/18/2018	0.24	J	< 0.32	U	< 1.6	U	0.54	J	< 0.61	U
071918007/071918008 (N)	AMS-1	Downwind	AMS-1-20180719 (N)	07/19/2018	0.57	J	< 0.32	U	< 1.6	U	1.0		0.65	J
071918009/071918010 (N)	AMS-2	Upwind	AMS-2-20180719 (N)	07/19/2018	0.25	J	< 0.32	U	< 1.6	U	0.62	J	< 0.61	U
071918011	AMS-3	Upwind	AMS-3-20180719	07/19/2018	0.39	J	< 0.32	U	< 1.6	U	0.81		< 0.61	U
Total Number of Samples Analyzed:					9		9		9		9		9	
Number of Detections:					9		0		0		9		2	
Min:					0.24		0		0		0.54		0.61	
Max:					0.57		0		0		1.4		0.65	
Average:					0.34		0		0		0.86		0.63	

[O: MGP 1/2/2019, C:SGW 1/3/19, Q: JQW 1/7/19]

Notes:

(N) = Normalized sample locations created from combining parent and field duplicate samples following EPA protocol

< = Concentration is less than reported limit

µg/m³ = micrograms per cubic meter

J = Estimated concentration

MGP = manufactured gas plant

U = Concentration was not detected above the reported limit

VOC = Volatile Organic Compound

Lab comments and definitions can be found in associated laboratory reports.

Table 1b. Performance Air Monitoring Results Summary

Former Green Bay MGP Sediment

Green Bay, WI

BRRTS#: 02-05-000254

UPSEPA#: WIN000509948

9-digit Code	Sample Location	Wind Orientation	Field Sample ID	Sample Date	VOC		VOC		VOC		VOC		VOC	
					Benzene	Ethylbenzene	Naphthalene	Toluene	Xylenes, Total					
Reporting Units:					µg/m ³	µg/m ³	µg/m ³	µg/m ³	µg/m ³					
					Result	Flag	Result	Flag	Result	Flag	Result	Flag		
Baseline Air Average Concentration: ¹					0.34	0	0	0.86	0.63					
Acceptable 24-hour Average Concentration: ²					31.95	998.71	104.85	354.24	99.87					
072618004	AMS-1	Upwind	AMS-1-20180726	07/26/2018	0.31	J	< 0.32	U	< 1.6	U	0.72	J	< 0.61	U
072618005	AMS-2	Downwind	AMS-2-20180726	07/26/2018	< 0.23	U	< 0.32	U	< 1.6	U	0.41	J	< 0.61	U
072618006	AMS-3	Crosswind	AMS-3-20180726	07/26/2018	< 0.23	U	< 0.32	U	< 1.6	U	0.33	J	< 0.61	U
080218007	AMS-1	Upwind	AMS-1-20180802	08/02/2018	0.65		0.50	J	< 1.6	U	1.5		1.1	J
080218008	AMS-2	Downwind	AMS-2-20180802	08/02/2018	0.40	J	< 0.32	U	< 1.6	U	0.94		0.74	J
080218009	AMS-3	Upwind	AMS-3-20180802	08/02/2018	0.42	J	< 0.32	U	< 1.6	U	1.0		< 0.61	U
090518012	AMS-1	Upwind	AMS-1-20180905	09/05/2018	0.51	J	0.32	J	< 1.6	U	1.3		1.6	J
090518013	AMS-2	Downwind	AMS-2-20180905	09/05/2018	0.39	J	< 0.32	U	< 1.6	U	0.84		1.1	J
090518014	AMS-3	Crosswind	AMS-3-20180905	09/05/2018	0.52	J	0.42	J	< 1.6	U	1.2		1.4	J
101118003/101118004 (N)	AMS-1	Upwind	AMS-1-20181011 (N)	10/11/2018	0.30	J	< 0.32	U	< 1.6	U	0.76		1.0	J
101118002	AMS-2	Crosswind	AMS-2-20181011	10/11/2018	< 0.23	U	< 0.32	U	< 1.6	U	0.31	J	< 0.61	U
101118001	AMS-3	Downwind	AMS-3-20181011	10/11/2018	0.50	J	0.47	J	< 1.6	U	0.59	J	< 0.61	U
102218001	AMS-1	Downwind	AMS-1-20181022	10/22/2018	0.25	J	< 0.32	U	< 1.6	U	0.40	J	< 0.61	U
102218002	AMS-2	Crosswind	AMS-2-20181022	10/22/2018	0.28	J	< 0.32	U	< 1.6	U	0.32	J	< 0.61	U
102218003/102218004 (N)	AMS-3	Upwind	AMS-3-20181022 (N)	10/22/2018	0.86		0.55	J	< 1.6	U	0.65	J	0.61	J

Total Number of Samples Analyzed:	15	15	15	15	15
Number of Detections:	12	5	0	15	7
Min:	0.25	0.32	0	0.31	0.61
Max:	0.86	0.55	0	1.5	1.6
Baseline Air Average Concentration: ¹	0.34	0	0	0.86	0.63
Number of Samples that Exceed the Baseline Air Average Concentration:	8	5	0	5	6
Acceptable 24-hour Average Concentration:	31.95	998.71	104.85	354.24	99.87
Number of Samples that Exceeded Acceptable 24-hour Average Concentration:	0	0	0	0	0
Number of Downwind or Crosswind Samples that Exceeded Upwind Concentration:	2	2	0	0	0

[O: MGP 1/2/2019, C:SGW 1/3/19, JQW 1/7/19]

Table 1b. Performance Air Monitoring Results Summary

Former Green Bay MGP Sediment

Green Bay, WI

BRRTS#: 02-05-000254

UPSEPA#: WIN000509948

Analyte concentration exceeds the standard for:

BOLD Value exceeds the Baseline Air Average Concentration

No Values Exceed the Acceptable 24-hour Average Concentration

Italicized Value exceeds that days Upwind Concentration

Yellow highlighting in Statistics = detected exceedances above upwind concentration

(N) = Normalized sample locations created from combining parent and field duplicate samples following EPA protocol

< = Concentration is less than reported limit

µg/m³ = micrograms per cubic meter

J = Estimated concentration

MGP = manufactured gas plant

U = Concentration was not detected above the reported limit

VOC = Volatile Organic Compound

1. Baseline Air Average Concentrations derived from the average concentrations in Table 1a.

2. Acceptable 24-hour Average Concentrations adopted from the Wisconsin Bureau of Environmental and Occupational Health Department of Health and Family Services "*Health-based Guidelines for Air Management, Public Participation, and Risk Communication During the Excavation of Former Manufactured Gas Plants.*" Naphthalene concentration is DHFS-derived for 14-day acute exposure, and all other parameters are U.S. EPA reference concentrations (RfC) for lifetime exposure.

Lab comments and definitions can be found in associated laboratory reports.



Figures

1/7/2019 6:33:16 PM stolzsd

Y:\GIS\Projects\151584\MXD\Figure 1 - Air Monitoring Station Location Map.mxd



- AIR MONITORING STATION
- ← TRUCK TRAFFIC
- LFR PROCESSING FACILITY PARCEL BOUNDARY

**FORMER GREEN BAY MANUFACTURED GAS PLANT SITE
WISCONSIN PUBLIC SERVICE CORPORATION
CITY OF GREEN BAY, WISCONSIN**

AIR MONITORING STATION LOCATION MAP