Wisconsin Public Service Corporation
700 North Adams Street
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Green Bay, WI 54307-9001
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August 15, 2019

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

RE: July 2019 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 June 2019 Monthly Progress Report to United States Environmental Protection Agency (USEPA) by July 15, 2019.
- Participated in North Focus Area (NFA) Design Work Groups.
- Submitted a sample location map of NFA 1-inch quality control (QC) core visual observation locations on July 19, 2019.
- Initiated QC visual observation of sediment thickness via 1-inch core collection within completed dredged areas of the NFA on July 23, 2019.
- Initiated QC visual observations of dense non-aqueous phase liquid (DNAPL) via bucket sample collection within completed dredged areas of the NFA on July 31, 2019.
- Submitted daily QC visual observations of sediment thickness via One Drive shared folder.
- Submitted daily QC visual observations of DNAPL observations via One Drive shared folder.

2) ANALYTICAL AND OTHER TESTING RESULTS RECEIVED

- NFA weekly performance air monitoring.

3) PROJECTED WORK

WPSC Actions

- Submit monthly progress report to USEPA by the 15th of the month.
- Perform NFA QC visual core and visual bucket observations.

- Perform NFA quality assurance (QA) confirmation core collection and analytical laboratory analyses.
- Prepare to revise and respond to comments on Draft South Focus Area (SFA) Remedial Action (RA) Summary Report received on July 17, 2019.
- Participate in work group meetings with USEPA to discuss the NFA RA activities.
- Prepare a Site-Specific Work Plan (SSWP) Addendum for replacement of MW402R, which was inaccessible during the November 2018 semi-annual groundwater monitoring event due to asphalt pavement covering the top of the flush mount well.
- Prepare for completion of a Remedial Investigation/Feasibility Study (RI/FS) report.

USEPA Actions

- Participate in work group meetings to discuss NFA RA.
- Participate in NFA QC observation and QA core collection activities.
- Prepare for completion of RI/FS report.

4) PROBLEMS OR POTENTIAL PROBLEMS ENCOUNTERED

- None

5) ACTUAL OR PLANNED RESOLUTION OF PROBLEMS OR POTENTIAL PROBLEMS

- None

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 1. Performance Air Monitoring Table

For distribution to:
Ms. Sarah Krueger, WDNR (via US Mail and email)
Ms. Cheryl Bougie, WDNR (via email)
Mr. William Fitzpatrick, WDNR (via email)
WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)
Ms. Adrienne Korpela, Jacobs (via email)
Ms. Staci Goetz, OBG, Part of Ramboll (via email)

Table 1. Performance Air Monitoring Results Summary

Monthly Progress Report - Air Monitoring 2019 NFA
Former Green Bay MGP Sediment
Green Bay, WI
BRRTS#: 02-05-000254 USEPA#: WIN000509948

9-digit Code	Sample Location	Orientation	Sample Date	VOC Benzene		VOC Ethylbenzene		VOC Naphthalene		VOC Toluene		VOC Xylenes, Total	
			Reporting Units:	µg/m³		µg/m³		µg/m³		µg/m³		µg/m³	
				Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
			Baseline Air Average Concentration:[1]	**0.33**		**0**		**0**		**2.6**		**0.69**	
			Acceptable 24-hour Average Air Concentration:[2]	31.95		998.71		104.85		354.24		99.87	
070219021	AMS-4	Upwind	07/03/2019	0.29	J	0.32	U	1.6	U	0.45	J	0.61	U
070919026	AMS-4	Downwind	07/10/2019	**0.79**		**0.86**		**1.9**	J	1.2		**1.2**	J
071719027	AMS-4	Crosswind	07/17/2019	**0.71**		**6.8**		**2.3**	J	**16**		**27**	
072519030	AMS-4	Crosswind	07/25/2019	**1.1**		0.32	U	1.6	U	1.9		0.61	U
070219024	AMS-5	Crosswind	07/03/2019	**3.4**		**2.9**		**5.7**		**11**		**5.8**	
070919024	AMS-5	Crosswind	07/10/2019	**0.38**	J	0.32	U	1.6	U	0.68	J	0.61	U
071719028	AMS-5	Upwind	07/17/2019	**1.7**		**1.8**		**7.4**		2.5		**1.6**	J
072519031	AMS-5	Downwind	07/25/2019	**2.0**		**1.1**		**1.9**	J	**8.5**		**2.3**	J
070219022/070219023 (N)	AMS-6	Downwind	07/03/2019	**17**		**17**		**30**		**16**		**17**	
070919025	AMS-6	Upwind	07/10/2019	**0.38**	J	0.32	U	1.6	U	2.6		0.61	U
071719029	AMS-6	Downwind	07/17/2019	**11**		**13**		**38**		**12**		**10**	
072519032-A	AMS-6	Upwind	07/25/2019	**1.8**		**1.4**		1.6	U	**33**		**4.0**	

Total Number of Samples Analyzed:	12		12		12		12		12	
Number of Detections:	12		8		7		12		8	
Min:	0.29		0.86		1.9		0.45		1.2	
Max:	17		17		38		33		27	
Baseline Air Average Concentration:	0.33		0		0		2.6		0.69	
Number of Samples above Baseline Air Concentration:	11		8		7		6		8	
Number of Samples above Upwind Values:	5		5		5		4		5	
Acceptable 24-hour Average Air Concentration:	31.95		998.71		104.85		354.24		99.87	
Number of Samples that Exceed Acceptable Air Concentration:	0		0		0		0		0	

[O:MGP 6/28/19, C: SGW 7/2/19, QC: JQW 7/2/19, U: JQW 7/3/19, QC: SJM 7/8/19, U: JQW 7/10/19, U:MGP 7/17/19, C:SGW 7/18/19, Q: JQW 7/18/19,UC:MGP7/31/19, Q: JQW 8/2/19]

	Sample Location	Acceptable 24-hour Average Concentration (µg/m³)				
		31.95	998.71	104.85	354.24	99.87
Average Concentration[3]:	AMS-4	0.72	1.99	1.45	4.88	7.20
	AMS-5	1.87	1.49	3.95	5.67	2.50
	AMS-6	7.54	7.89	17.40	15.90	7.82

Analyte concentration exceeds the standard for:
BOLD Value exceeds the Baseline Air Average Concentration
No Values Exceed the Acceptable 24-hour Average Concentration
Yellow highlighting in Statistics = detected concentrations above Baseline Average Concentration
Orange highlighting in Statistics = detected concentrations above Upwind Concentrations

(N) = Normalized sample locations created from combining parent and field duplicate samples following EPA protocol
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 3.
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.
3. Non-detections were treated as 1/2 the detection limit.

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

AMS-5 was relocated on 6/13/2019 closer to the eastern perimeter of the site in order to obtain more representative data and to provide a safer working environment due to the heavy cement dust that was generated at its original location.