

From: Krueger, Sarah E - DNR
Sent: Wednesday, May 20, 2020 2:37 PM
To: 'Rolfes, Sarah'
Cc: Fitzpatrick, William - DNR
Subject: WDNR Comments on
Attachments: 20200520_99_DNR_Comments_to_EPA_PDI_WP_Rev0.pdf

Good Afternoon Sarah,

Thank you for the chance to comment on the work plan. Attached is a memo with DNR comments on the PDI WP Rev. 0.

Please let us know if you have any questions.
Thank you,
Sarah

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Sarah Krueger, P.G.

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DATE: May 20, 2020

FILE REF: BRRTS # 02-05-000254

TO: Sarah Rolfes – U.S. EPA Region 5

FROM: Department of Natural Resources
Sarah Krueger – Remediation & Redevelopment Program
Bill Fitzpatrick – Remediation & Redevelopment Program

SUBJECT: Green Bay MGP Superfund, WDNR comments on Preliminary Remedial Design Investigation Work Plan, dated March 16, 2020

General Comments:

The purpose of the PDI WP is to guide an interim action near the WPSC Annex building. We support the PDI as a step towards restoring this site. Note that following completion of an interim action, “unless otherwise directed by the department, responsible parties shall initiate and complete a site investigation in accordance with ch. NR 716” (Wis. Adm. Code NR 708.11(5)). WPSC has not defined the full degree and extent of site contamination and has not taken action to fully address soil and groundwater exceedances. Following completion of the interim action additional remedial action may be required to get to the point of NR 700 closure. The current PDI WP does not identify or address all the data gaps for the site, two examples are provided below.

1. Based on review of Table 5 from the 2003 Remedial Action Documentation Report, thermally treated soil used as backfill within the excavation still has exceedances of Groundwater Pathway, Industrial, and/or Non-Industrial Direct Contact Residual Contaminant Levels, Wis Adm Code NR 720, remaining of PAHs, and/or VOCs. Additional sampling within the thermally treated soil backfill areas is recommended to address this data gap.
2. The extent of subsurface NAPL in the area of the former MGP structures south of Utility Court are not known. Based on review of Table 12 from the 2003 Remedial Action Documentation Report, the side wall and bottom samples from the four excavation areas still have exceedances of Groundwater Pathway, Industrial, and/or Non-Industrial Direct Contact Residual Contaminant Levels, Wis Adm Code NR 720, remaining of PAHs, and/or VOCs. For example, Sample EW 2-4 (7-ft) has detections of benzene at 8,900 ppb, benzo(a)pyrene at 11,000 ppb, and naphthalene at 95,000 ppb all of which are above the Wis Adm Code NR 720 Industrial Direct Contact Residual Contaminant Level. Additionally, the statement on page 15 of the 2020 PDI WP that “excavations did not proceed laterally or vertically to remove tar that occurred in clay fractures or silt seams.”; indicates there may be NAPL that extends laterally from the excavation areas in silt seams. The extent of NAPL does not appear to be defined. This data gap may need to be addressed in the future separate from the current PDI WP and subsequent planned interim action.