

DATE: November 11, 2020 FILE REF: BRRTS 02-05-000254

TO: Frank Dombrowski (WEC Energy Group)

FROM: DNR NER RR: Sarah Krueger and Bill Fitzpatrick

SUBJECT: WDNR Wis. Adm. Code NR 700 Specific Comments on WPSC's September 18, 2020 Upland Remedial Investigation Data Summary Report Revision 0 Former WPSC Green Bay MGP, Green Bay, Wisconsin, Wisconsin Public Service Corporation

The Department of Natural Resources (DNR) conducted a review of the Upland Remedial Investigation Data Summary Report for evaluation of compliance with a Wisconsin Administrative Code Ch. NR 716 Site Investigation. Based on the data provided the DNR recommends:

1. Identify areas which will require capping for a Wis. Adm. Code Ch. NR 726 closure and evaluate the effectiveness of the current surface cover(s). As part of the evaluation, additional sampling may be necessary to determine if the cover is protective. Areas not deemed protective will require additional remedial action/cap installation.
 - a. The cap area should include all areas of Industrial, Non-Industrial Direct Contact, and soil to groundwater RCL exceedances.
 - b. The DNR is especially concerned that the current surface cover in the area of the trail and grassy area between the Annex Building and the parking lot is not adequate for protection of public health. Additional evaluation of the current surface cover should be performed to document that it meets the requirements for a direct contact cap.
 - c. As currently defined on the figures, cap maintenance will be required for Utility Court, N Jefferson Street, Elm Street, and North Madison Street due to PAHs in soil for soil to groundwater and direct contact.
 - d. A cap maintenance plan should be developed for all cap areas that should include (at a minimum) the following: the cap purpose (soil to groundwater, direct contact or both) and cap material, e.g. building, parking lot, landscaping, road, etc.
2. Due to naphthalene present in the shallow soil approximately four times above the NAPL indicator near the Annex, an additional soil gas sample should be collected between SG401 and SG402 near the SB-419 boring location.
3. Per the August 17, 2020 Emerging Contaminants Letter, you received DNR requires an emerging contaminant (includes PFAS) scoping statement prior to closure as a Wis. Admin. Code ch. NR 716 requirement.