

From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Thursday, November 12, 2020 9:46 AM
To: 'Rolfes.sarah@epa.gov'
Cc: Krueger, Sarah E - DNR; Fitzpatrick, William - DNR; DNR RR NER; Prasad, Narendra M; 'staci.goetz@ramboll.com'
Subject: Former WPS Green Bay, WI MGP Site - Response to 11-11-20 WDNR Comments
Attachments: RTC_WDNR Comments on WPSC Sept 18 2020 Upland RI Data Summary_FJD.pdf

Sarah,

Please find attached our responses to the comment memo recently received from WDNR regarding our Upland RI Data Summary Report of September 18, 2020 for the former Green Bay MGP site.

Please feel free to contact me with any questions.

Thanks,

Frank Dombrowski
Principal Environmental Consultant

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November 12, 2020

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

**RE: Response to Comments
Former Green Bay 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 Service Corporation (WPSC) hereby provides the following response to preliminary comments received from Wisconsin Department of Natural Resources (WDNR) Project Manager, Ms. Sarah Krueger via email correspondence on November 6, 2020, and subsequently formalized in a memorandum received November 11, 2020, regarding WDNR Wis. Adm. Code NR 700 Specific Comments on WPSC's September 18, 2020 submittal, *"Upland Remedial Investigation Data Summary Report Revision 0, Former WPSC Green Bay MGP, Green Bay, Wisconsin, Wisconsin Public Service Corporation."*

AGENCY COMMENTS

WDNR Comment 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.*

WPSC Response 1:

1a: A Cap Maintenance Plan for the site was previously submitted as Appendix E to the March 2004 Groundwater Monitoring Update. The approved Site-Specific Work Plan (SSWP) Rev 2 identified sample locations that provided further delineation of surface and subsurface soil contamination outside the perimeter of the cap maintenance area because WPSC intends to maintain the cap to protect against potential future direct contact risks. Ramboll will incorporate 0-4-ft samples in remaining supplemental Pre-Design Investigation (PDI) borings that will be completed in grassy/landscaped areas this week and 2-4 foot in asphalt-covered areas for shallow risk evaluations that will be incorporated into the formal Remedial Investigation (RI) Baseline Risk Assessment (BLRA).

1b: PDI sampling was performed under the approved August 12, 2020 PDI Work Plan. Investigation activities were performed on August 26-27, 2020, September 9-11, 2020, and are currently ongoing in November. During PDI activities conducted in August and September, additional borings were collected within the grassy/landscaped areas highlighted in the map attached to the November 6 email correspondence that requested additional soil cover evaluation. Some of these PDI borings did include sample intervals within the top 4 feet to supplement the risk assessment evaluation. These data will be sent with November PDI sampling results to the validator, provided in monthly progress reports following validation, and will be incorporated into the BLRA.

The far southeast grassy areas highlighted in the map attached to the November 6 email where samples are being requested is outside of the former MGP boundary and is a City of Green Bay parcel (at the east end of Utility Court).

- We do not currently have an access agreement to sample on that parcel.
- Previous forensic testing indicated urban background PAHs in this area.
- To address this questions, Ramboll will advance two borings as close to the WPSC-Green Bay parcel boundary as utilities safely allow. We will collect two sample intervals in the 0-ft to 4-ft interval to assess soil cover in this area.

1c: The Cap Maintenance Plan referenced above currently includes Utility Court, N. Jefferson Street, Elm Street, and North Madison Street.

1d: The existing Cap Maintenance Plan does not include soil cover in grassy/landscaped areas. As part of the ongoing RI/ risk assessment evaluation that will be supplemented with information collected during the additional PDI activities, potential updates to the Cap Maintenance Plan will be incorporated into a future remedial action work plan, including addressing grassy/landscaped areas, as appropriate.

WDNR Comment 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.*

WPSC Response 2: Utilities greatly restrict drilling within the grassy area between the parking lot and the Annex building. Also, the ground surface slopes with an elevation change of about 4-ft up to the building, further making drilling in this area difficult.

- a. The proposed soil gas probe location shown on the map attached to the November 6 email is at the intersection of stormwater, gas, and underground electrical utilities.

- b. Site investigation activities performed during 2014-2015 evaluated soil gas and indoor air and risks were not identified. Should WDNR need the 2015-2016 vapor intrusion evaluation documents summarizing these results retransmitted, we can make those available via Sharefile. As previously documented in those submittals, no indoor air risk exists, and institutional and engineering controls are warranted.

WDNR Comment 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.*

WPSC Response 3: Future RI-related submittals will include an emerging contaminant (including per- and polyfluoroalkyl substances [PFAS]) scoping statement. A preliminary review of Interstate Technology and Regulatory Council (ITRC) documents for emerging contaminants such as PFAS and 1,4-dioxane does not suggest their occurrence is consistent with the type of release at the Site due to manufactured gas plant activities (ITRC 2020 and 2019).

If you have any questions, please don't hesitate to contact me at (414) 587-4467 or via email at frank.dombrowski@wecenergygroup.com.

Sincerely,



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

Enclosure: None

For distribution to: Ms. Sarah Rolfes, USEPA (via email)
 Mr. Naren Prasad, WPSC (via email)
 Ms. Sarah Krueger, WDNR (via US Mail and email)
 Mr. William Fitzpatrick, WDNR (via email)
 WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)
 Ms. Staci Goetz, Ramboll (via email)

References

Interstate Technology & Regulatory Council (ITRC), 2020. Per- and Polyfluoroalkyl Substances (PFAS) Technical/Regulatory Guidance, September 2020, accessed at https://pfas-1.itrcweb.org/wp-content/uploads/2020/10/itrc_pfas_techreg_sept_2020_508-1.pdf

ITRC, 2019. Fact Sheet: 1,4-Dioxane, October 2019, accessed at <https://www.itrcweb.org/Team/Public?teamID=81>