

DATE: November 18, 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 September 18, 2020 Upland Remedial Investigation Data Summary Report for evaluation of compliance with a Wisconsin Administrative Code Ch. NR 716 Site Investigation and to determine actions necessary at this time to reach Wis. Admin. Code NR 726 Closure.

DNR 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: 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.

DNR Response: The 2015-2016 vapor assessment used the December 2010 version of RR-800, Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin, which at the time did not include the NAPL screening criteria part of the January 2018 expansion of RR-800. Due to the presence of utilities and the ground surface slope, to address the presence of naphthalene approximately four times above the NAPL indicator near the Annex please provide a cross section of the area through the utilities, and collect a vapor sample through the side wall of the partial basement near SB-419, in lieu of an exterior soil gas sample between SG401 and SG202, and adjacent to SB-419.