

From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Monday, February 1, 2021 1:14 PM
To: 'Rolfes.sarah@epa.gov'
Cc: Krueger, Sarah E - DNR; Fitzpatrick, William - DNR;
'adrienne.korpela@jacobs.com'; 'staci.goetz@ramboll.com'; DNR RR NER
Subject: Former Green Bay MGP- OU1 RI Data Summary Memo
Attachments: RTC- USEPA Green Bay RI Tech Memo Rev 0.pdf

Sarah,

Attached is our response to USEPA comments on Rev 0 of the RI Summary Tech memo for the former WPSC Green Bay MGP site (upland OU). Please feel free to contact me with any questions or if additional information may be needed.

Thanks,

Frank Dombrowski
Principal Environmental Consultant

WEC Energy Group - Business Services
Environmental Dept. - Land Quality Group
333 W. Everett St., A231
Milwaukee, WI 53203
Office: (414) 221-2156
Cell: (414) 587-4467
Fax: (414) 221-2022

*Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities,
Minnesota Energy Resources, Peoples Gas and North Shore Gas*



Wisconsin Public Service Corporation

700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

February 1, 2021

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

RE: Response to U.S. Environmental Protection Agency Comments on Upland Remedial Investigation Data Summary Report – Revision 0 (Report) for Operable Unit 1, Former Green Bay Manufactured Gas Plant Site, Green Bay, Wisconsin Wisconsin Public Service Corporation CERCLA Docket No. V-W-06-C-847, CERCLIS ID – WIN000509948

Dear Ms. Rolfes:

Wisconsin Public Service Corporation (WPSC) is providing this letter response to the United States Environmental Protection Agency (USEPA) comments received on December 7, 2020, on the Upland Remedial Investigation Data Summary Report – Revision 0 (Report) for Operable Unit 1, for the Wisconsin Public Service Corporation (WPSC) Green Bay Manufactured Gas Plant (MGP) Site, dated September 18, 2020.

For ease of review, USEPA comments are presented below in italics, followed by responses developed for WEC Business Services, LLC (WBS). A Remedial Investigation Report incorporating comments and Early Action Removal elements will be submitted and developed at a later time, to be determined mutually with USEPA.

GENERAL COMMENTS

- 1. In general, this pre-remedial investigation (RI) Report and pre-baseline risk assessment (BLRA) report contains many assertions and statements that conclude, for example, that source material is not present, or that there is no risk, except in the (undefined) areas subject to a preliminary design investigation (PDI) and removal action. The report also emphasizes past documents that have been reviewed and approved by the Agencies as evidence the remaining contamination is acceptable. The review by the Agencies of this pre-RI Report and pre-BLRA does not connote acceptance of statements contained herein on remaining risk, and assertions of whether source material remains*

WPSC Response: Comment is acknowledged. The RI Report and BLRA that are to be developed and submitted will evaluate and present risk according to three cumulative risk ranges, including 10^{-6} , 10^{-5} , and 10^{-4} .

2. *The Pre-Design Investigation sampling results should be integrated into the Upland RI Report.*

WPSC Response: PDI sample results will be evaluated to guide Early Removal Action (ERA) work plan development. Any PDI sample data that is not excavated during the ERA will be incorporated into an RI Report.

SPECIFIC COMMENTS

3. *Section 4.1.1, page 24: Any monitoring well locations where non-aqueous phase liquid (NAPL) is or has been observed as a measurable thickness should be highlighted on Figure 8. Whether wells were constructed with sumps and the thickness of NAPL observed should be discussed in Section 4.1.1. An assessment of the physical characteristics and mobility of all remaining occurrences of NAPL should be performed as part of the RI/feasibility study process. This should also include an assessment of the recoverability of NAPL in areas where there are remaining measurable thicknesses of NAPL in monitoring wells.*

WPSC Response: Figure 8 will be revised in the RI Report. None of the wells have sumps. Additional discussion of NAPL observations and thicknesses will be provided. Prior field observations for monitoring wells with NAPL accumulations will be summarized. In addition to summarizing observations, bail down tests will be conducted at monitoring wells MW-405B and MW-401AR for a transmissivity evaluation. These monitoring wells will be gauged daily initially, then weekly, and monthly until stability is attained.

4. *Section 4.1.2, page 26: The text here states, "no exceedances of industrial surface soils (0-4 feet) for inorganic compounds (Figure 12C)." However, soil data figures 12a through 12c suggest that the area that was excavated as Area 4 in 2003 (that appears to be impacted with gas purifier wastes) does not appear sufficiently characterized in the 0 to 4-foot interval with respect to inorganic constituents. Given that arsenic and cyanide appear to drive risk at the site, might additional characterization of this area be warranted?*

WPSC Response: Samples were collected according to approved site-specific work plans for site characterization at a reasonable sample density. The area has been adequately characterized.

5. *Section 4.2.2.4, page 29: Please check that the order of anaerobic respiration processes listed here is correct.*

WPSC Response: Comment is acknowledged and the revision will be made in the RI Report.

6. *Section 4.2.2.4, page 29: Note that in sulfate-reducing environments iron sulfide minerals will form where sufficient sulfur is present. This may result in a reduction in dissolved iron concentrations. As such, the relative concentrations of iron should be taken in context of other redox indicators when assessing them as an indicator for biodegradation.*

WPSC Response: Comment is acknowledged.

7. *Section 4.2.2.5, page 30: Considering the generally poor resulting R2 values that suggest the best linear fit to log-normalized concentration data may not accurately represent temporal trends, consideration should be given to using statistical approaches that are better suited for assessing trends in environmental data (e.g. Mann-Kendall test).*

WPSC Response: WDNR guidance does not allow use of Mann-Kendall (see notice on WDNR website: <https://dnr.wisconsin.gov/topic/Brownfields/Pubs.html>). A more robust statistical analysis will be presented in the RI Report.

8. *Section 4.3, page 31: In the last sentence of the second paragraph, the count should be 15 of 28 samples.*

WPSC Response: This revision will be incorporated into the RI Report.

9. *Section 4.3, page 31: The naphthalene exceedance at IA1 occurred in data reported as September 2016, not August.*

WPSC Response: This revision will be incorporated into the RI Report.

10. *Section 5.2.1, page 36: The reference to exceedances above mid risk criteria should be to Figure 23 (not Figure 22).*

WPSC Response: This revision will be incorporated into the RI Report.

11. *Section 5.2.2, page 36: Add a reference to Table 7 for groundwater SL exceedances.*

WPSC Response: This revision will be incorporated into the RI Report.

12. *Section 5.2.2, page 36: In the 2nd sentence of the fourth paragraph, acknowledge the additional chemicals (not solely benzene) that exceeded groundwater vapor intrusion screening levels (VISLs).*

WPSC Response: Comment is acknowledged. This revision will be made in the RI Report.

13. *Section 5.2.3, page 37: In the 1st sentence, add that subslab vapor samples were also collected.*

WPSC Response: This revision will be incorporated into the RI Report.

14. *Section 5.2.3, page 37: Based on Figure 19, there is a soil gas sample (ethylbenzene in SS405A) exceedance at the Butler Building. The last sentence of the first paragraph should be reworded accordingly. Consider the need for collecting indoor air samples at the Butler Building.*

WPSC Response: The Butler Building is used for storage of office equipment (desks, file cabinets, furniture, etc.), landscape equipment (mowers, snowblowers, etc.), and parking lot salt. There is no office space nor do any workers occupy the building. Based on building use, the vapor intrusion pathway is incomplete, and no further sampling is needed. The RI Report will include a discussion regarding usage and occupancy of the Butler Building.

15. *Section 5.2.3, page 37: Please note in paragraph 2 that naphthalene also exceeded its soil vapor VISL at SG401.*

WPSC Response: Comment is acknowledged. This revision will be incorporated in the RI Report.

16. *Section 5.3, page 37: There is a soil gas exceedance at the Butler Building. Please revise this section accordingly. In addition, conclusions regarding risk should be put in terms of contaminants of concern (COCs) based on various target risk levels (10^{-6} , 10^{-5} , 10^{-4}) and target hazard index of 1.*

WPSC Response: Comment is acknowledged. Revision will be made in the RI Report.

17. *Section 6.1.1, page 38: The last sentence of this paragraph seems to present contradictory statements. Specifically, if there are measurable thicknesses of NAPL in monitoring wells, then NAPL should be assumed to be greater than residual at that location (as it is able to enter a monitoring well), unless other lines of evidence indicate*

otherwise. The statement, "there are no longer any indications of source material" is inaccurate, given that all NAPL (residual or otherwise) represents a source.

WPSC Response: The presence of the monitoring well created a secondary permeability feature into which residual NAPL in the clay could accumulate. See response to Comment 3 for discussion of further evaluation of NAPL.

18. Section 6.1.1, page 38: Please provide an explanation of the source of NAPL in MW-405A. The presence of NAPL in a well that was not historically impacted by NAPL may indicate that there may be an area of source material remaining that is migrating.

WPSC Response: The thickness of NAPL in MW-401AR and MW-405A has been stable, as discussed in section 4.2.2. No changes will be made.

19. Section 6.1.2, page 38: Consideration should be given to adding a summary discussion to this section of soil conditions as they relate to all constituents of potential concern, not just select organic constituents.

WPSC Response: A summary discussion of inorganic constituents will be added in the RI Report.

20. Section 6.1.3, page 38: See Comment 7 on Section 4.2.2.5. The conclusions regarding concentration trends over time are not well supported by the statistical approach used and described in Section 4.2.2.5. At a minimum future trend analyses should include additional discussion on the approach used that includes why it is appropriate, and its statistical strength.

WPSC Response: See response to comment 7 above.

21. Section 6.1.4, page 39: There is a soil gas exceedance at the Butler Building, therefore the vapor intrusion pathway cannot be concluded to be incomplete. Please revise this section accordingly.

WPSC Response: See response to comment 14 above.

22. Section 6.1.5, page 39, paragraphs 2-4: As noted in the previous comment, there is a soil gas exceedance at the Butler Building. Please revise this section accordingly. In addition, conclusions regarding risk should be put in terms of COCs based on various target risk levels (10^{-6} , 10^{-5} , 10^{-4}) and target hazard index of 1.

WPSC Response: See response to comments 14 and 16 above.

23. Figures 8, 9a and 9d: Figure 8 indicates "oil wetted-coated material above native clay", however cross-section A-A' in Figure 9a shows a deeper interval of "oil coated/oil wetted" material that extends into the native clay at SB-418D. Please clarify this discrepancy. This appears to potentially be the same case with boring SB-418F on cross-section G-G' in Figure 9d.

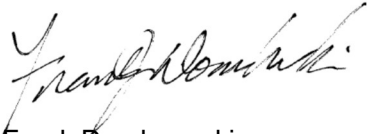
WPSC Response: Figures 8, 9a, and 9d will be modified in the RI Report.

24. Figure 21: The graphical Conceptual Site Model shown on Figure 21 should include a note that explains that the depicted sheet pile wall near the river only covers about 15% of the project shoreline. At least 200 linear feet of shoreline does not have a sheet pile wall between known NAPL and the river.

WPSC Response: Figure 21 will be revised for the RI Report. Symbology will be added to the inset map to convey the extent of the sheetpile wall.

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: None

For distribution to: 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. Adrienne Korpela, Jacobs (via email)
 Dr. Staci Goetz, Ramboll (via email)