

From: Rolfes, Sarah <Rolfes.Sarah@epa.gov>
Sent: Friday, February 19, 2021 9:12 AM
To: Dombrowski, Frank J
Cc: Prasad, Narendra M; 'staci.goetz@ramboll.com'; Fitzpatrick, William - DNR; Krueger, Sarah E - DNR
Subject: RE: Former WPSC Green Bay MGP Upland OU - Draft LOI
Attachments: EPA Comments_RE Draft LOI_02.19.21.pdf

Good morning Frank,

Attached please find EPA's comments on the draft Letter of Intent for early action at OU1 of the WPSC Former Green Bay MGP site. Please review and let me know if you would like to discuss any of the comments.

Thanks so much,
Sarah

From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Wednesday, January 13, 2021 12:51 PM
To: Rolfes, Sarah <Rolfes.Sarah@epa.gov>
Cc: Prasad, Narendra M <narendra.prasad@wecenergygroup.com>; 'staci.goetz@ramboll.com' <staci.goetz@ramboll.com>
Subject: Former WPSC Green Bay MGP Upland OU - Draft LOI

Hi Sarah,

As discussed, we have prepared the attached draft Letter of Intent for early action at the WPSC Green Bay site upland site for your review and comment.

Please let me know if you have any questions or may need additional information.

Thanks,

Frank Dombrowski
Principal Environmental Consultant

WEC Energy Group - Business Services
Environmental Dept. - Land Quality Group
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*Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities,
Minnesota Energy Resources, Peoples Gas and North Shore Gas*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

VIA ELECTRONIC MAIL

February 19, 2021

REPLY TO THE ATTENTION OF:

SR-6J

Mr. Frank Dombrowski
Principal Environmental Consultant
WEC Business Services – Environmental Dept.
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307

Re: Review of the Draft Letter of Intent to Conduct Early Removal Action, Operable Unit 1,
Former Green Bay Manufactured Gas Plant Site, Green Bay, Wisconsin

Dear Mr. Dombrowski,

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the document entitled: *Draft Letter of Intent to Conduct Early Removal Action (LOI)* for Operable Unit 1, Former Green Bay Manufactured Gas Plant Site, dated January 13, 2021. Comments on the draft LOI are provided in Attachment 1. Please review the comments and provide a revised LOI.

If you have any questions or wish to discuss any of the comments, please do not hesitate to contact me at 312-886-6551.

Sincerely,

2/19/2021

X Sarah Rolfes

Sarah Rolfes
Remedial Project Manager
Signed by: SARAH ROLFES

EPA Region 5 SEMD

cc: Mr. William Fitzpatrick (WDNR)
Ms. Sarah Krueger (WDNR)

Attachment 1 – EPA Comments on the Draft Letter of Intent

1. The scope of work proposed in the draft letter to conduct an early action on the upland portion of the Former WPSC Green Bay Manufactured Gas Plant (MGP) site is very targeted. As previously discussed, EPA supports early action activities at sites in order to expedite clean-up. EPA also does not want to prohibit any potential development actions at the site. However, this action, if authorized, does not preclude or remove WPSC from any future work that may be deemed necessary during the CERCLA process. WPSC will be required to resume the RI/FS for the upland portion of the site, upon completion of any authorized early actions. Further, EPA cannot guarantee that no further work will be deemed necessary, during the CERCLA process.
2. WPSC has proposed addressing surface soils where cumulative cancer risk exceeds 1×10^{-5} . As the draft letter of intent makes it clear that redevelopment is possible for this site, EPA suggests that the conservative risk level of 1×10^{-6} be utilized for this action. As future land use is unknown, WPSC should evaluate all future land use potential including residential.
3. The draft letter of intent indicates that WPSC proposes to remove and dispose of all soil visually identified as oil-wetted or oil-coated *to the extent practicable*. The scope further indicates that the proposed early action *will not proceed laterally or vertically to remove minor amounts of oil-wetted/oil-coated material that may be observed intermittently in trace amounts in native clay fractures at the bottom of excavation or in silt seams in excavation sidewalls*. Please note that EPA's position is that NAPL is principal threat waste and that it be removed to the extent practicable. Simply by stating that the action will not proceed to remove minor amounts of material that may be observed intermittently in trace amounts does not demonstrate that it is not practical to remove this material. Further, EPA notes that the recently completed OU2 sediment work did pursue trace amounts of NAPL and was successful in those actions.
4. Please clarify how the excavation limits will be defined in the field. The LOI should state what field measurements, analytical samples and observations will be used to ensure targeted impacted media are addressed in the interim action.
5. All removal actions proposed and an estimated schedule for the activities should be included in the LOI and Figure 2. For example, the proposed removal actions along the river walk are not depicted in Figure 2. Additionally, SB-600 is not referenced in the text but has a cumulative risk exceedance for shallow soils. Please review and update the LOI and Figure 2, accordingly.
6. The LOI references utilizing institutional controls on the property to address remaining soils greater than four feet below ground surface. Please note that EPA cannot guarantee that WPSC will not be required to perform additional work in the future. As noted in Comment 1, WPSC will be required to complete the RI/FS per the Administrative Order on Consent. During the RI/FS, an assessment will be made concerning remaining site contamination and risks to human health and the environment. Also note if institutional controls will be required on the property, WPSC will be required to implement them in accordance with the state of Wisconsin requirements (including using the Wisconsin Remediation and Redevelopment Database). Additional discussion related to institutional controls with EPA and Wisconsin DNR will be held in the future.
7. Please note the Removal Action Work Plan should also include procedures for verification sampling during the excavation (sidewall and floor samples). It should also include sampling procedures if worker entry into the excavation is prohibited for safety reason.