

From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Tuesday, March 30, 2021 3:39 PM
To: Krueger, Sarah E - DNR; Fitzpatrick, William - DNR
Cc: 'Rolfes.sarah@epa.gov'; DNR RR NER; 'adrienne.korpela@jacobs.com'; 'staci.goetz@ramboll.com'; Brian Hennings (Brian.Hennings@ramboll.com)
Subject: Former WPS Green Bay MGP Upland - Response to WDNR Tech Memo Comments
Attachments: RTC-WDNR Green Bay RI Tech Memo Rev 0_210330.pdf

Sarah/Bill,

Please find attached our responses to WDNR's comments to the above referenced submittal. Please feel free to contact me with any questions.

Thanks,

Frank Dombrowski
Principal Environmental Consultant

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March 30, 2021

Ms. Sarah Krueger and Mr. Bill Fitzpatrick
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727

RE: Response to WDNR Wis. Adm. Code NR 700 Specific Comments on WPSC's September 18, 2020 Upland Remedial Investigation Data Summary Report – Revision 0 Former Green Bay Manufactured Gas Plant Site, Green Bay, Wisconsin, Wisconsin Public Service Corporation BRRTS 02-05-000254

Dear Ms. Krueger and Mr. Fitzpatrick:

Wisconsin Public Service Corporation (WPSC) is providing this letter response to the Wisconsin Department of Natural Resources (WDNR) comments received on November 18, 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. Preliminary comments were received from WDNR November 6, 2020 via email correspondence and initial responses were provided November 11, 2020.

For ease of review, WDRN 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 the United States Environmental Protection Agency (USEPA).

GENERAL COMMENTS

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 and potentially unsafe.

- 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 elevated 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 as remedial measures.

DNR Response: he 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.

WPSC Response: The partial basement does not extend to this portion of the building, precluding the collection of a side wall gas sample. Soil boring location SB-419 will be proposed for excavation as part of the Removal Action, the timing of which will be agreed upon by USEPA and WPSC, to address elevated naphthalene concentrations detected in soil.

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 Rolfes, U.S. Environmental Protection Agency
 WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)
 Ms. Adrienne Korpela, Jacobs (via email)
 Dr. Staci Goetz, Ramboll (via email)