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Frank,

I understand that the same date you sent me the Utility Court Corridor Investigation Work Plan, Pre-Design Investigation Work Plan, Addendum 1 for review, WPSC had proceeded with the investigation. Please see EPA's comments to the WP below, which should be addressed in the Utility Court Corridor Report. As indicated below, I would appreciate clarification on how WPSC implemented the sampling component of this investigation, and whether any sheen, soil or groundwater samples were collected.

Section No.	Page No.	Para No.	EPA Comment No.	EPA Comment
1	1	2	1	Where was the approximate location of the sheen observed by the WDNR contractor? Show on figures if within the figure range.
1	1	2	2	Please clarify who collected the sediment samples and surface water sheen samples and what criteria were used to determine that the source of the sheen was likely MGP-related. At a minimum, please reference other documentation, if it exists, that described this evaluation process.
1	1	2	3	If the sheen was identified "adjacent to the site", as noted in the second sentence of the second paragraph, how can the fourth sentence state that "No known upland MGP source areas are located adjacent to the August sheen observation? Please clarify.
1	1	2	4	The last sentence indicates that the investigation will primarily be based on visual observations, yet Section 3 has provisions for analysis of samples. Revise language for clarity/consistency.
3	3	4	5	"For borings that indicate the presence of contamination in native clay..." This wording implies that samples will only be collected if there's indications of contamination in native clay. However, samples should be collected at depth intervals above native clay that indicate contamination. Revise for clarity.
3	3	6	6	The procedure for which investigation areas to investigate differs slightly than what is presented on Figures 2 and 3. It is suggested to revise or remove the wording from the figures and just label the investigation areas.

Thank you,

Leah Werner
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From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>

Sent: Tuesday, December 21, 2021 12:10 PM

To: Werner, Leah <Werner.Leah@epa.gov>

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Subject: Former WPS Green Bay MGP - Supplemental Site Assessment Activities Along Utility Corridor

Leah,

As discussed during our last project update call, we are performing some supplemental investigation activities along the utility corridor near the shoreline at the former Green Bay MGP site. Attached is a brief description of the planned activities. Please feel free to contact me with any questions.

Thanks,

Frank Dombrowski
Principal Environmental Consultant

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