



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

**VIA ELECTRONIC MAIL**

March 15, 2022

REPLY TO THE ATTENTION OF:

SR-6J

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

Re: Review of the Focused Supplemental Sampling and Investigation Results Memorandum,  
Former Green Bay Manufactured Gas Plant Site, Green Bay, Wisconsin

Dear Mr. Dombrowski,

The U.S. Environmental Protection Agency (EPA) has reviewed the document entitled: *Focused Supplemental Sampling and Investigation Results Memorandum (Results Memo)* for the Former Green Bay Manufactured Gas Plant Site, dated February 18, 2022. Comments on the Results Memo are provided in Attachment 1.

If you have any questions or wish to discuss any of the comments, please do not hesitate to contact me at 312-886-0552.

Sincerely,

A handwritten signature in black ink, appearing to read "Leah Werner".

Leah Werner  
Remedial Project Manager

cc: Ms. Sarah Krueger (WDNR)  
Mr. Glenn Luke (WEC)

## Attachment 1 – Comments on the Former Green Bay MGP Results Memo

### General Comments

1. Has a review of historical aerials, maps (e.g., Sanborns), and other documentation been reviewed to assess other possible localized release scenarios? A cursory review of historical aerials available for viewing at [historicaerials.com](http://historicaerials.com) shows historical structures were present in this area between the late 1930s and up to 1971, and that this may have been a ship docking area (1960).

### Specific Comments

2. Section 3.1.4, Page 4: Was the location of the sheen outboard of the toe-of-the-slope of the rip rap? Based on where sediment was observed, and where poling and sampling were possible, it appears the sheen was not originally (prior to investigative disturbances) observed beyond the outboard extent of the rip rap.
3. Section 3.2.3, Page 6: Based on the findings of the upland utility corridor investigation, is the western extent of the sheen source presumed to extend beneath the rip rap and adjacent walkway?
4. Section 4.1, Page 7: What is the footprint and thickness associated with the 40 CY assumption?
5. Section 5.1, Page 8: The isolated extent and consistently limited thickness of the impacts observed, as well as the flow direction of the river, and the downstream distance of the south focus area suggests the source of these impacts is unlikely to be dredged residuals.
6. Section 5.2, Page 8: Please confirm with the city and/or utilities when utility work was last completed on Utility Court, Utility Street and N Madison Street, and confirm if any methods were employed to limit contaminant migration such as clay plugs.
7. Section 5.3, Page 9: Include a discussion of additional data needs and recommended next steps. What would an approach look like for addressing these impacts? Would further assessment of extent be part of a removal action? Are there plans to continue to monitor for the sheen and reinstall the booms if necessary?
8. Figure 2: Please clarify poling vs probe locations. Each probe location is identified as a poling location in the call out boxes on Figure 2.
9. Figures 2, 3, 4, and 6: Please add the approximate maximum extent of the footprint of the observed sheen.