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

**Sent:** Monday, April 4, 2022 2:08 PM

To: Dombrowski, Frank J

**Cc:** Krueger, Sarah E - DNR; 'adrienne.korpela@jacobs.com';

'staci.goetz@ramboll.com'; Luke, Glenn R

Subject: RE: Former WPSC Green Bay MGP - Supplemental PDI Workplan
Attachments: EPA Comments Green Bay OU1 PDI WP Add 2 Memo\_04042022.pdf

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Hi Frank,

Please see EPA's comments to the PDI Work Plan Addendum 2, attached. Please respond to these comments prior to the start of the supplemental PDI work.

Thank you,

Leah Werner
U.S. EPA Remedial Project Manager
312.886.0552
werner.leah@epa.gov

From: Dombrowski, Frank J < <a href="mailto:frank.dombrowski@wecenergygroup.com">frank.dombrowski@wecenergygroup.com</a>>

Sent: Tuesday, March 15, 2022 9:31 AM
To: Werner, Leah < Werner.Leah@epa.gov>

**Cc:** 'sarah.krueger@wisconsin.gov' <<u>sarah.krueger@wisconsin.gov</u>>; 'adrienne.korpela@jacobs.com' <<u>adrienne.korpela@jacobs.com</u>>; 'staci.goetz@ramboll.com' <<u>staci.goetz@ramboll.com</u>>; Luke, Glenn R <<u>Glenn.Luke@wecenergygroup.com</u>>

Subject: Former WPSC Green Bay MGP - Supplemental PDI Workplan

Leah,

As discussed at our last project update call, please find attached for your review the supplemental PDI workplan for additional soil borings and sampling in the north parking lot area of OU1. At this time, we have the drillers scheduled for the week of 4/11. If we could get your feedback on the workplan in time to facilitate that schedule it would be mot appreciated. Please do not hesitate to contact me with any questions.

Thanks.

Frank Dombrowski Principal Environmental Consultant WEC Energy Group - Business Services Environmental Dept. - Land Quality Group 333 W. Everett St., A231 Milwaukee, WI 53203

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

## **VIA ELECTRONIC MAIL**

REPLY TO THE ATTENTION OF:

April 4, 2022

SR-6J

Mr. Frank Dombrowski Principal Environmental Consultant WEC Business Services – Environmental Dept. 700 North Adams Street P.O. Box 19001 Green Bay, WI 54307-9001

Re: Review of the Pre-Design Investigation Work Plan Addendum No. 2, Revision 0, WPSC Green Bay Former Manufactured Gas Plant Site, Green Bay, Wisconsin

Dear Mr. Dombrowski,

The U.S. Environmental Protection Agency (EPA) has reviewed the document titled: *Pre-Design Investigation Work Plan Addendum No. 2, Revision 0* (PDI WP Add. 2), for a portion of the upland operable unit (OU1), Green Bay Former Manufactured Gas Plant ("Site"), dated March 14, 2022. Comments on the PDI WP Add. 2 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,

LEAH WERNER Digitally signed by LEAH WERNER Date: 2022.04.04 14:02:38

Leah Werner Remedial Project Manager EPA, Region 5

cc: Ms. Sarah Krueger (WDNR)

## Attachment 1 – Comments on the PDI WP Add. 2 for Green Bay Former MGP OU1

## **Specific Comments**

- 1. Section "Current Data Gaps", Page 2/5: Based on the data shown on Figure 1, it appears that the northern extent of oil-coated or oil-wetted soil has not been established in the area north of the Annex building. Specifically, soil boring SB-598 indicates the presence of "oil wetted-coated material" across a thin interval between 9.7 and 9.8 feet below grade. If this is not considered a data gap, provide rationale. Otherwise, given the objectives of this PDI WP Add. 2, additional soil boring(s) is (are) recommended north of this location and south of the river to establish the extent of this principal threat waste.
- 2. Section "Soil Boring Advancement and Sampling Methods", Page 3/5: The text states, "Soil samples collected from the secondary borings will be submitted to the analytical laboratory and placed on hold pending the results of the primary soil borings." If a secondary boring has visual, olfactory, or PID indication of impacts of MGP residuals, soil samples collected from this secondary boring should be analyzed at the same time as the soil samples from the primary borings, and not be held pending the results of the primary borings. Further, if impacts are noted at a secondary boring, it may also be appropriate to collect soil samples from additional step-out boring(s) and hold them for laboratory analysis pending the results of the secondary boring, for horizontal delineation purposes.