From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Wednesday, April 6, 2022 9:05 AM
To: Werner, Leah
Cc: Krueger, Sarah E - DNR; 'adrienne.korpela@jacobs.com'; 'staci.goetz@ramboll.com'; Luke, Glenn R; Klatt, David/CHC; DNR RR NER
Subject: RE: Former WPSC Green Bay MGP - Supplemental PDI Workplan
Attachments: RTC_Green Bay PDIWP Add 2 Rev 0 FINAL.pdf

Leah,

Thank you for your prompt review of the Supplemental PDI Workplan. Our responses to the comments are attached. Pease feel free to contact me if there are 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
Office: (414) 221-2156
Cell: (414) 587-4467
Fax: (414) 221-2022

Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities, Minnesota Energy Resources, Peoples Gas and North Shore Gas

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From: Werner, Leah <Werner.Leah@epa.gov>
Sent: Monday, April 4, 2022 2:08 PM
To: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Cc: 'sarah.krueger@wisconsin.gov' <sarah.krueger@wisconsin.gov>; 'adrienne.korpela@jacobs.com' <adrienne.korpela@jacobs.com>; 'staci.goetz@ramboll.com' <staci.goetz@ramboll.com>; Luke, Glenn R <Glenn.Luke@wecenergygroup.com>
Subject: RE: Former WPSC Green Bay MGP - Supplemental PDI Workplan

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 <frank.dombrowski@wecenergygroup.com>
Sent: Tuesday, March 15, 2022 9:31 AM
To: Werner, Leah <Werner.Leah@epa.gov>
Cc: 'sarah.krueger@wisconsin.gov' <sarah.krueger@wisconsin.gov>; 'adrienne.korpela@jacobs.com' <adrienne.korpela@jacobs.com>; 'staci.goetz@ramboll.com' <staci.goetz@ramboll.com>; Luke, Glenn R <Glenn.Luke@wecenergygroup.com>
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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Wisconsin Public Service Corporation
700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001
www.wisconsinpublicservice.com

April 6, 2022

Ms. Leah Werner
Remedial Project Manager
United States Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Response to Comments on Pre-Design Investigation Work Plan, Addendum 2
Green Bay Former Manufactured Gas Plant
Green Bay, Wisconsin
Wisconsin Public Service Corporation
CERCLA Docket No. V-W-06-C-847, CERCLIS ID – WIN000509948

Dear Ms. Werner:

Wisconsin Public Service Corporation (WPSC) is providing this letter response to the United States Environmental Protection Agency (USEPA) comments received on April 4, 2022 on the Pre-Design Investigation Work Plan, Addendum No. 2, submitted to USEPA on March 14, 2022 for the Wisconsin Public Services Corporation (WPSC) Green Bay Former Manufactured Gas Plant, Green Bay, Wisconsin.

For ease of review, USEPA comments are presented below in italics, followed by responses developed for WEC Business Services, LLC (WBS).

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.*

WPSC Response: An additional primary soil boring (SB-635, attached updated Figure 1) will be advanced north of SB-598. An additional secondary soil boring (SB-636, attached updated Figure 1) will be advanced to the west of SB-635 in case material in SB-635 is identified as principal threat waste. An additional secondary boring is not proposed north of SB-635 due to the proximity of the river. In the event that principal threat waste is identified in SB-635, sheet pile would be installed as far north as practicable, and the excavation would extend to the sheet pile. The Sampling and Analysis Plan (Table 4) has also been updated accordingly.

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.

WPSC Response: WPSC/Ramboll concurs that if a secondary boring has visual, olfactory, or PID indications of MGP residuals, soil samples collected from the secondary boring will be analyzed at the same time as soil samples from the primary borings. If impacts are noted in secondary borings, additional step-out borings may be performed. Alternately, previously installed soil borings having adequate data may be used to define the extents of principal threat waste. Exact locations will not be identified ahead of the fieldwork as many potential locations are possible and will depend on adjacent boring observations.

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,

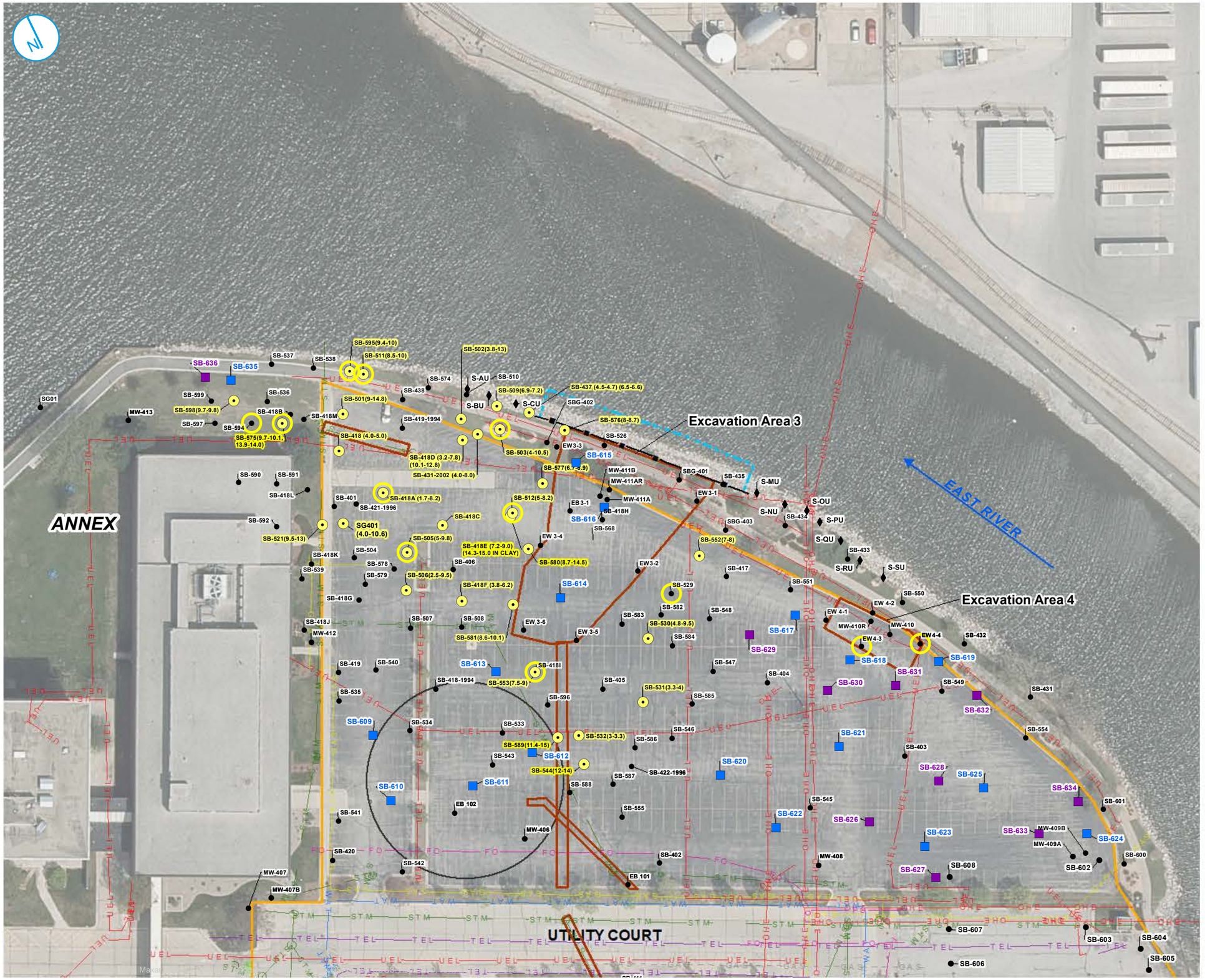
Frank Dombrowski
Principal Environmental Consultant
WEC Business Services – Environmental Dept.

Enclosures: Figure 1 – Principal Threat Waste Observations and Proposed Sample Location Map
Table 4 – Sampling and Analysis Plan

For distribution to: Ms. Sarah Krueger, WDNR (via US Mail and email)
WDNR Northeast Region (via email to DNRRRNER@wisconsin.gov)
Ms. Adrienne Korpela, Jacobs (via email)
Mr. Dave Klatt, Jacobs (via email)
Dr. Staci Goetz, Ramboll (via email)

ENCLOSURES

Y:\GIS\Projects\15\15841\MXD\Figure 1_PDI Workplan Addendum.mxd



- OIL WETTED-COATED MATERIAL
- SOIL BORING LOCATION
- 2017 VISUAL BORING - NO OIL-WETTED/OIL-COATED MATERIAL OBSERVED
- RESIDENTIAL CANCER RISK > 1E-3 OR HAZARD INDEX >10
- SHEET PILE WALL
- SHORELINE EXCAVATION EXTENT (REMEDIAL ACTION COMPLETED IN 2018)
- FORMER STRUCTURE
- SOIL REMEDIATION EXCAVATION AREAS (2003)
- RIVER FLOW DIRECTION
- CAP MAINTENANCE AREA
- PRIMARY PROPOSED SOIL BORING
- SECONDARY PROPOSED SOIL BORING
- FO — FIBER OPTIC LINE
- GAS — GAS LINE
- SAN — SANITARY SEWER LINE
- STM — STORM SEWER LINE
- TEL — TELEPHONE LINE
- WAT — WATER LINE
- UEL — UNDERGROUND ELECTRIC LINE
- OHE — OVERHEAD ELECTRIC LINE
- GAS — ABANDONED GAS LINE

SB418 (4.0-5.0) SAMPLE ID AND INTERMITTENT NAPL DEPTH IN FEET BELOW GROUND SURFACE

0 35 70
Feet

PRINCIPAL THREAT WASTE OBSERVATIONS AND PROPOSED SAMPLE LOCATION MAP

FIGURE 1

RAMBOLL US CORPORATION
A RAMBOLL COMPANY

RAMBOLL

PROJECT: 1690000XXXX | DATED: 4/5/2022 | DESIGNER: STOLZSD

Table 4. Sampling and Analysis Plan Summary

Pre-Design Investigation Work Plan, Addendum 2
Wisconsin Public Service Corporation
Former MGP Site - Green Bay
700 N. Adams Steet, Green Bay, WI 54307
BRRTS# 02 05 000254 USEPA# WIN000509948

SAMPLE TYPE	SAMPLE FREQUENCY	ESTIMATED NUMBER OF SAMPLES[1]	PARAMETER	METHOD	FIELD DUPLICATES (1 extra volume)	MS/MSD (2 extra volumes)	EQUIPMENT BLANKS	TRIP BLANKS	TOTAL NUMBER OF SAMPLES	ESTIMATED NO. OF CONTAINERS	CONTAINER TYPE	MINIMUM VOLUME	PRESERVATION (Cool All Samples to 4° ± 2°C Unless 'None' Indicated)	HOLDING TIME FROM SAMPLING DATE
Subsurface Investigation per Workplan Addendum	If visual, olfactory, or PID indications of impacts: 1 within impacted interval(s), 1 immediately below impacted interval(s), 1 from bottom of boring. If no indication of impacts: 1 sample within 2-ft interval above clay	Continuous	Logging	Multi-Site SOP SAS-05-02	--									
		Up to 3 per boring	PVOCs [1]	8260	1 per 20	1 per 20	Equipment blanks will be collected at a frequency of 1 per soil sampling day with non-dedicated sampling equipment.	VOC trip blanks will accompany each cooler containing VOC samples.	Min: 28 samples collected & 18 samples analyzed; Max: 84 samples collected & analyzed	Min: 28 Max: 84	Glass Vial	2 oz.	NaSO4 and MeOH	48 hours to freeze 14 days to analyze
		Up to 3 per boring	PAHs [2]	8270	1 per 20	1 per 20				Min: 28 Max: 84	Glass	4 oz.	--	14 days to extract 40 days to analyze
		Up to 3 per boring	Total Metals [3]	6020A/7471	1 per 20	1 per 20				Min: 28 Max: 84	Plastic	5 oz.	--	14 days/6 months
		Up to 3 per boring	Total Cyanide	9012B	1 per 20	1 per 20				Min: 28 Max: 84	Glass	4 oz.	--	14 days

Notes:

1. Petroleum volatile organic compounds (PVOCs) include benzene, ethylbenzene, toluene, total xylenes, and 1,2,4-trimethylbenzene
2. Polycyclic aromatic hydrocarbon (PAHs) include 1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene
3. Total Metals include arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver