

**From:** Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>  
**Sent:** Thursday, June 29, 2023 10:50 AM  
**To:** Werner, Leah  
**Cc:** Krueger, Sarah E - DNR; Lauridsen, Keld B - DNR; 'adrienne.korpela@jacobs.com'; 'staci.goetz@ramboll.com'; Abigail Small (ASMALL@ramboll.com); Julie A Zimdars (Julie.Zimdars@ramboll.com); Luke, Glenn R; Klatt, David/CHC; DNR RR NER  
**Subject:** Green Bay SSWP Addendum Rev 1 and RTC for your review  
**Attachments:** 2023-06-29 SSWP Addendum Green Bay MGP Rev 1.pdf; 2023-06-29 SSWP Addendum Green Bay MGP Rev 1\_Redline Text.pdf

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Good Morning Leah,

Attached please find WPSC's response to comments and Rev 1 of the RI SSWP Addendum for the former Green Bay, WI MGP site. We have also included a redline/strike out version of the document for your convenience. Please feel free to contact me if there are any questions or if additional information may be needed.

Thanks and have a great Holiday weekend.

*Frank Dombrowski*  
*Principal Environmental Consultant*

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June 29, 2023

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

**RE: Response to Comments and Transmittal of Site Specific Work Plan Addendum No. 1, Revision 1**  
**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 June 21, 2023 on the Site Specific Work Plan Addendum No. 1, Revision 0, submitted to USEPA on May 16, 2023 for the Former Green Bay 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 (WBS). A revised Site Specific Work Plan Addendum No. 1, Revision 1 (Work Plan) dated June 30, 2023 is also included.

#### **SPECIFIC COMMENTS**

- 1. Soil Vapor Sampling, Page 6, 1<sup>st</sup> Paragraph: EPA recognizes that the building is currently unoccupied, has no operational HVAC system, and the current conditions may not be representative of future building redevelopment plans. Future investigation work related to the VI pathway is required once there's an operational HVAC system and the final building redevelopment plans are known, regardless of the results of the proposed sampling.*

**WPSC Response:** Given that work performed at this time will not close out data gaps related to the VI pathway and future investigation work will be needed to address the VI pathway once redevelopment plans and construction/engineering/renovation specifications are known, WPSC recommends detailed assessment of the VI pathway would most effectively be performed at that time and has removed the soil vapor and indoor air sampling from the existing work plan.

- 2. Soil Vapor Sampling, Page 6, 2<sup>nd</sup> paragraph: If the existing sub-slab and soil gas sampling ports are found to not pass the chemical leak test or found to be otherwise non-functional, they should be properly repaired or abandoned and new ports shall be installed as close to the existing ports as possible, and then sampling activities should be completed as specified.*

**WPSC Response:** See Response to Comment 1. Sub-slab and soil gas sampling have been deferred to a later date and therefore removed from the work plan so this comment is no longer applicable.

3. *Soil Boring Locations, Page 7: Consideration should be given to an additional step out location southeast of proposed boring SB-718. If SB-718 shows impacts, an additional soil boring at the southeast corner of the intersection of N. Madison and Elm would be required to achieve a lateral delineation in this area.*

**WPSC Response:** Upon further review of utilities in the southeast corner of the parking lot, the location of boring SB-718 has been moved into the roadway to allow for appropriate utility offsets for the safe installation of the boring. Further, WPSC acknowledges that if impacts are identified at SB-718, additional step-out boring(s) would be needed. However, the utility network is dense at this intersection, and WPSC does not own the parcels to the south and east of the roadways. Access agreement(s) would need to be negotiated to install borings on those parcels. WPSC intends to proceed with the initial boring in the roadway. If contingent borings are required, USEPA will be notified, and access agreements will be negotiated at that time. Installation of contingent boring(s), if necessary, will be performed as part of a second drilling mobilization.

Note that minor adjustments were made to the location of two other borings (SB-716 and SB-717) between Revision 0 and Revision 1 due to a refined understanding of the utilities in N. Madison Street. Minor adjustments were also made to the location of borings SB-708, SB-710, and SB-713 between Revision 0 and Revision 1 so that the borings are installed on WPSC-owned property and not on third-party (Harbinger Corporation) property. Installation on WPSC-owned property reduces installation constraints, including work hours and restoration requirements imposed by the third-party property owner. Boring locations may be field modified as needed based on the field-identified locations of utilities.

4. *Well Installation, Page 8, 3<sup>rd</sup> bullet: Each well should be constructed with a sump that is a minimum of 2 feet long to allow for the accumulation of mobile NAPL if present. The top of the sump (base of the screen) should be placed at the capillary barrier where additional downward migration of NAPL is likely impeded and the sump should extend below this and the annular space around the sump should not be sand packed, but sealed with grout or bentonite. For example, cross-section D-D' suggests the surface of the "clay" beneath the "fissured clay" may represent such a barrier in some areas.*

**WPSC Response:** The text has been modified to indicate that the deeper well pairs will be installed with two-foot sumps with the top of the sump at the fissured and competent clay interface. However, WPSC does not support installing two-foot sumps at the capillary interface between the fill unit and the fissured clay unit in the shallow wells for the following reasons:

- The fill thickness (<8 feet) limits the available space for placing the well with an appropriate annular seal.
- A two-foot sump would require drilling into the clay unit which may potentially cause cross-contamination/screening between the fill and clay units. The primary goal of the groundwater investigation is to determine if the contaminant mass contributing to groundwater impacts is predominantly related to principal threat waste in clay fractures or remaining principal threat waste in the fill unit. The inclusion of sumps with the shallow groundwater wells poses too much of a risk of spreading contamination across hydrostratigraphic units in the shallow wells. However, sumps may be installed on shallow

wells if field observations of oil-wetted/oil-coated material above the unit interface indicate that sumps can be installed without risking cross-contamination of the two units.

- Adjacent to locations SB-712 and SB-706, existing wells (MW-401AR and MW-403R) are currently screened across both hydrostratigraphic units. At these locations, if oil-wetted/oil-coated material is observed near the fill-clay interface, the existing adjacent monitoring well that is screened across both units will be used to monitor DNAPL accumulation. If the adjacent deep clay well with a sump (which is hydraulically isolated from the fill) accumulates DNAPL as well, then it will be inferred that the fractured clay is a source of the DNAPL. These results, in combination with the well screened in the overlying fill, the cross-unit well, and the visual logging of the soil boring to document the presence of oil-wetted/oil-coated material will be considered collectively to evaluate the source of groundwater impacts.

5. *Groundwater Sampling, Page 9: Please include a plan for the regular gauging of newly installed monitoring wells for the presence and thickness of any LNAPL and DNAPL that may accumulate within these installations. Please indicate how long these new installations are anticipated to remain in place.*

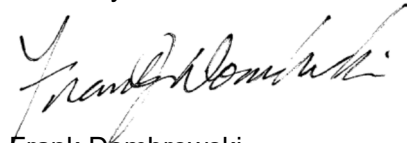
**WPSC Response:** A section on Observation of DNAPL Accumulation has been added to page 8 of the Work Plan. Following installation and development of new wells, the thickness of DNAPL in the wells (if present) will be measured on a consistent monthly basis for three months, using a weighted cotton string or interface probe. After three months, the gauging frequency will be reduced to semi-annually to coordinate with the planned semi-annual groundwater monitoring events. A minimum of four semi-annual monitoring events are anticipated to take place before a decision is made regarding the long term needs for any additional monitoring wells.

6. *Table 4, Sample Type – Soil Gas: Add naphthalene to the list of analytes in the Parameter column to be consistent with the text, Section “Soil Vapor Sampling,” that indicates sub-slab and soil gas samples are to be analyzed for BTEX, naphthalene, and 1,2,4-trimethylbenzene.*

**WPSC Response:** See Response to Comment 1. Sub-slab and soil gas sampling have been removed from the Work Plan so this comment is no longer applicable.

If you have any questions, please don't hesitate to contact me at (414) 221-2156 or via email at [frank.dombrowski@wecenergygroup.com](mailto:frank.dombrowski@wecenergygroup.com).

Sincerely,



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

Enclosures: Site Specific Work Plan Addendum No. 1, Revision 1

For distribution to: Ms. Sarah Krueger, WDNR (via email)  
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WDNR Northeast Region (via email to [DNRRRNER@wisconsin.gov](mailto:DNRRRNER@wisconsin.gov))  
Ms. Adrienne Korpela, Jacobs (via email)  
Mr. Dave Klatt, Jacobs (via email)  
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# MEMO

**To:** Glenn Luke – WEC Energy Group  
**From:** Abby Small and Staci Goetz – Ramboll  
**cc:** Frank Dombrowski - WEC Energy Group  
**Re:** Site Specific Work Plan Addendum No. 1, Revision 1  
Green Bay Former Manufactured Gas Plant, Green Bay, Wisconsin  
Wisconsin Public Service Corporation

## BACKGROUND AND OBJECTIVE

Ramboll has prepared this Site Specific Work Plan, Addendum 1 (SSWP Addendum) on behalf of Wisconsin Public Service Corporation (WPSC) for a portion of the upland operable unit (OU1) of the Green Bay Former Manufactured Gas Plant (MGP) (Figure 1). This investigation is to augment information collected under the USEPA-approved Site-Specific Work Plan (SSWP) Revision 2 (NRT, 2015a and NRT, 2015b) and the USEPA-approved VI Technical Memorandum Revision 1 (NRT, 2016b) to support delineation of the nature and extent of MGP impacts at the Site.

The former WPSC Green Bay MGP (Site) is one of six former MGP sites addressed through the Administrative Order on Consent (AOC) and Statement of Work (SOW), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Docket No. V-W-06-C-847, dated May 5, 2006. The Site is currently enrolled in the United States Environmental Protection Agency (USEPA) Superfund Alternative Approach (SAA) program. Under the AOC/SOW, a generic approach to addressing the six sites is to be developed (the Multi-Site approach), describing the procedures and tasks to be followed to complete the Remedial Investigation/Feasibility Study (RI/FS) at the former Green Bay MGP facility, which, in turn, may be modified to account for site-specific differences that may exist at a particular location.

To facilitate project progress, the site has been divided into a sediment operable unit (OU) and an upland OU. The upland OU (OU1) extends from the top slope of the East River riverbank, landward and includes soil, groundwater, and potential vapor. The sediment OU (OU2) extends from the top slope of the East River riverbank, riverward and includes channel sediments, underlying clay, and surface water. The upland OU1 consists of three parcels, the largest of which is owned by WPSC. The former MGP structures were primarily located on the southern part of this parcel (Figure 2). In relation to the upland OU1, the WPSC General Office and Annex Buildings are located northwest, the KI Convention center is located southwest, the Associated Bank Office Building is located south and parking areas owned by Harbinger Development LLC and Associated Bank National Association adjoin the Site to the south and east, respectively (Figure 3). For the purposes of this document, "Site" refers to areas where contamination related to the former MGP has been discovered through investigation activities completed to-date and nearby areas necessary for implementation of the response

June 29, 2023

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action inclusive of both the upland OU1 and the sediment OU2. For the purposes of this work plan, the upland OU1 has been further subdivided into two areas as follows:

- “North Parking Lot” refers to the portion of the Site located north of Utility Street/Utility Court. This portion of the site is bounded by the WPSC Annex Building to the west, Utility Court/Utility Street to the south, and the Fox River and East River to the north and east. The North Parking Lot is currently undergoing an Early Removal Action (ERA) as described below.
- “South Parking Lot” refers to the portion of the Site south of Utility Street/Utility Court inclusive of the roadways. The South Parking lot consists of two parcels and the adjacent roadways. The largest parcel is owned by WPSC and used for parking while the smaller parcel is owned by Harbinger Corporation and is used as parking for the Associated Bank Office Building to the south This portion of the Site is bounded by North Jefferson Street to the west, Utility Court/Utility Street to the north, North Madison Street to the East and Elm Street to the south. The former MGP structures were primarily located in this area (Figure 3).

The USEPA-approved SSWP Revision 2 was implemented in October 2015 and February 2016 to characterize the extent of MGP impacts in the subsurface soil and groundwater; and, evaluate vapor intrusion pathways. Supplemental vapor intrusion and indoor air sampling were implemented between August and December 2016 in accordance with the USEPA-approved VI Technical Memorandum Revision 1. An RI data summary package was submitted to USEPA for discussion on February 10, 2017 (NRT, 2017). An Upland Remedial Investigation Data Summary Report (Ramboll, 2020b) was submitted to USEPA in September 2020. USEPA provided comments on December 7, 2020.

In September 2022, an Early Removal Action Work Plan (Ramboll, 2022) was submitted to USEPA to address soil impacts in the North Parking Lot in preparation for potential redevelopment for residential use to expedite the RI/FS process. The ERA construction consists of removal and off-site disposal of soil identified as principal threat waste, removal and off-site disposal of the top four feet of surface soil in the main parking lot, and removal and off-site disposal of the top two feet of surface soil in the Riverwalk area. All areas will be backfilled and clean soil will be imported to address the direct contact pathway. Work began November 2022 and is ongoing with an anticipated completion date of July 2023.

Based on a review of site data collected to date, , supplemental RI activities are proposed to address remaining data gaps for the site and close out the RI phase of work. Remaining data gaps are further described below and include uncertainty regarding principal threat waste potentially remaining in place in the South Parking Lot.

## CURRENT DATA GAPS

In addition to the 2023 ERA, soil remediation was undertaken in 2003 with the objective of removing significant soil impacts and source areas. The selected remedy was source area excavation with medium temperature thermal desorption. Details of the remedial work were summarized in Section 4 of the Completion Report (NRT, 2014).

Excavation and decommissioning of former MGP structures and piping removed approximately 30,075 tons of soil and debris from four areas (Figure 3) that included the following:

- Area 1 (South Parking Lot) - included the 300,000 ft<sup>3</sup> gas holder near Elm Street
- Area 2 (South Parking Lot) - included the former tar well, oil tanks, purifiers, and small gas holders

- Area 3 (North Parking Lot) – included the suspected discharge area of the former concrete channel to the river
- Area 4 (North Parking Lot) – included an area along the East River bank near well MW-410 (elevated cyanide)

In addition, former MGP and sewer piping was also excavated and disposed as shown on Figure 3.

Excavation limits were determined by visual inspection because this was a source area removal effort. The main purpose for excavation was to remove former MGP structures (pipes, channels, tar well, etc.) considered to be sources of the tar impacted material. The extent of the excavation areas is shown on Figure 3. Figures 4a through 4c show the South Parking Lot and remediated areas in cross-section view. Areas 3 and 4 in the North Parking Lot were re-excavated as part of the 2023 ERA and are not further described below. A summary of the South Parking Lot 2003 remedial excavation (Area 1, Area 2, and the former piping) is provided below.

**Table A. Excavation Volumes and Disposal Summary**

Site Area/Feature	Depth Excavated ft. bgs (approx.)	Tons Excavated	Backfill Material	Final Disposal
<b>Area 1</b>	6-8	3,484	Imported Sand; Treated Soil	Excess soil thermally treated and debris disposed at Hickory Meadows
<b>Area 2 &amp; Tar Well</b>	Tar Well: 16-22, Other: 8-14	14,461	Treated Soil	

**Area 1**

Excavation depths ranged from 6 to 8 feet bgs around the former 300,000 ft<sup>3</sup> gas holder near Elm Street and approximately 3,484 tons of MGP impacted soil was excavated from Area 1 (Figure 3) and thermally treated. Approximately 90 to 95 percent of the concrete base of the gas holder was removed. Due to existing utilities and structures, a small portion of the base was left in place but other MGP conveyance piping, sewers, and impacted soil were excavated.

**Area 2**

The former tar well and subsurface foundations/structures of oil tanks, purifiers, small gas holders, and additional MGP conveyance piping and sewers were excavated from Area 2 (Figure 3). The former 50-foot diameter tar well extended approximately 16 - 20 feet bgs and was filled with tar-impacted soil and debris. An additional gas holder (possibly the remains of a 15,000 ft<sup>3</sup> gas holder) filled with similar material was also encountered. These structures, the material within them, and adjacent soils were excavated and thermally treated or transported for landfill disposal. Former MGP piping or structures and areas of impacted soils were excavated south of the tar well. More than 14,460 tons of MGP impacted soil was excavated from Area 2 and thermally treated. Excavation depths ranged from 16 - 22 feet bgs within the tar well, 10 - 12 feet bgs in the 15,000 ft<sup>3</sup> gas holder area, and 8 - 14 feet bgs in surrounding areas.

**Former Piping**

Former MGP piping, abandoned gas lines, and sewer piping were excavated to depths of 5 to 10 feet bgs. Many former MGP conveyance pipes and sewers were excavated according to plan but others were excavated as encountered during excavation (Figure 3). All MGP related piping, sewers, and structures were excavated as part of the remediation effort as discussed in the Completion Report (NRT, 2014). Where inaccessible or at excavation extents, pipes were abandoned in place and filled with concrete grout to



prevent preferential migration of groundwater. Tar-impacted conveyance piping, sewers, and structures were removed and segregated for disposal at an off-site landfill while the surrounding soils were thermally treated.

Excavations did not proceed laterally or vertically to remove tar or tar staining that observed in clay fractures or silt seams as agreed upon with Wisconsin Department of Natural Resources (WDNR) in the 2003 Remedial Action Work Plan (NRT, 2003). The USEPA noted in the May 29, 2020 comments on the Pre-Design Investigation Work Plan – Revision 0 (Ramboll, 2020a), that:

*The extent of subsurface NAPL in the area of the former MGP structures south of the Utility Court are not known. Based on a review of Table 12 from the 2003 Remedial Action Documentation Report, the side wall and bottom samples from the four excavation areas still have exceedances of screening levels. For example, Sample EW 2-4 (7 ft) has detections of benzene at 8,900 ppb, benzo(a)pyrene at 11,000 ppb, and naphthalene at 95,000 ppb all of which are above screening levels. Additionally, the statement on page 15 of the 2020 PDI WP that excavations did not proceed laterally or vertically to remove tar that occurred in clay fractures or "silt seams", indicates there may be NAPL that extends laterally from the excavation areas in silt seams. The extent of NAPL does not appear to be defined.*

This work plan aims to address the aforementioned comment and define the horizontal and vertical limits of potential principal threat waste beyond the previous removal areas.

Additionally, following the 2003 excavation, three monitoring wells (MW-401AR, MW-402R, and MW-403R, Figure 5) were re-installed within the backfilled areas with screens that partially span the remedial excavation backfill and partially span the clay unit. Existing monitoring wells MW-405A and MW-404 are also sampled on a semi-annual basis to monitor groundwater in the South Parking Lot (Figure 5) and are screened across the fill and clay. Figure 4a through Figure 4c depict the remedial excavation, lithology and monitoring wells in the South Parking Lot in cross-section view. Since the 2003 remedial action, dense non-aqueous phase liquid (DNAPL) has been periodically detected in wells MW-401AR and MW-405A. Groundwater concentrations in the cross-unit screened wells MW-402R, MW-403R, and MW-404 have shown ongoing benzene and naphthalene groundwater concentrations exceeding Risk Assessment Framework SLs (Table 1). It is unknown whether the source of the contaminant mass contributing to groundwater impacts and the ongoing DNAPL in wells is predominantly related to principal threat waste in clay fractures below the remedial excavation backfill or principal threat waste outside the excavation areas that has re-affected the backfill. This work plan aims to better define the source of the ongoing groundwater impacts in the South Parking Lot.

Based on these identified data gaps, the primary objectives of this SSWP is to delineate the extent of remaining principal threat waste in the South Parking Lot including:

- Determine the horizontal and vertical limits of principal threat waste beyond the previous removal areas, including in Elm Street and Madison Street.
- Determine if principal threat waste remains within Excavation Area 1 and 2 or if principal threat waste has re-affected the backfill placed during the 2003 remedial action.
- Better define the source of the ongoing groundwater impacts in the South Parking Lot. Determine if the contaminant mass contributing to groundwater impacts is predominantly related to principal threat waste in clay fractures or remaining principal threat waste in the fill unit.

## PROPOSED SUPPLEMENTAL SAMPLING ACTIVITIES

Based on the discussion above, additional investigation will be performed to complete delineation of the nature and extent of principal threat waste in the South Parking Lot. The supplemental RI activities described below will be performed in accordance with the site-specific information included in the SSWP Revision 2 and the Multi-Site Field Sampling Plan (FSP) – Revision 4 (IBS, 2008), except where noted.

### Soil Boring and Sampling

For the purposes of this investigation, a definition of principal threat waste consistent with the definition used in the North Parking Lot Early Removal Action Work Plan (Ramboll, 2022) will be utilized and will be defined as soil that meets one or more of the following metrics:

- Non-aqueous phase liquid (NAPL) identified as separated liquid.
- Oil-coated or oil-wetted soil.
- Highly adsorbed phase concentrations of constituents of concern (COCs) exceeding a lifetime incremental cancer risk (CR) of  $10^{-3}$  or a hazard index (HI) of 10 under applicable, residential land use assumptions.

### Soil Boring Locations

Soil borings will be installed at the 18 primary soil boring locations shown on Figure 5. Contingent soil boring (SB-714) will only be installed if principal threat waste (as defined above) is identified at primary boring SB-717. USEPA will be notified if the contingent boring is needed based on field observations or laboratory analytical results. Seven primary boring locations are located within the 2003 excavation area to vertically delineate the potential presence of principal threat waste in clay fractures and determine if present, whether the principal threat waste has re-affected the backfill placed during the 2003 remedial action. Eleven primary boring locations and the single contingent boring location are located exterior to the previous excavation area to laterally delineate the horizontal limits of principal threat waste beyond the previous removal areas. Soil boring locations were also limited by the presence of utilities throughout the parking lot and streets and shown on Figure 5. Locations may be field modified as needed based on the field-identified locations of utilities.

If principal threat waste is identified at SB-718, additional step-out boring(s) may be needed. However, the utility network is dense at the intersection of Elm Street and N. Madison Street, and WPSC does not own the parcels to the south and east of the roadways. Access agreement(s) will need to be negotiated to install borings on those parcels. WPSC intends to proceed with the initial boring in the roadway. If contingent borings are required, USEPA will be notified, and access agreements will be negotiated at that time. Installation of contingent boring(s) will be performed as part of a second drilling mobilization.

Soil borings will be advanced using a direct-push method. Unless otherwise noted, sampling will be continuous, to define the presence/absence and vertical extent of affected soil at each boring location and extend a minimum of 5-ft into the confining clay layer. For the purpose of guiding investigation fieldwork, the vertical and horizontal extent of principal threat waste will be considered delineated if:

- no oil-coated or oil-wetted observations are present for two consecutive sample intervals (e.g., 4-feet); and
- for the evaluation of risk criteria, a Residential CR is less than  $10^{-3}$  and Residential HI is less than 10 within one sample interval.

All borings advanced as part of the investigation will be continuously logged, following Multi-Site standard SOP SAS-05-02, the presence of fill material, moisture content, photoionization detector readings, the nature of each geologic unit encountered, and visual and olfactory observations indicating the presence of NAPL (e.g., oil-coated, or oil-wetted). Soil boring locations will be recorded per Multi-Site SOP SAS-03-03, and will be abandoned following the methods described in Multi-Site SOP SAS-05-05. Field equipment will be calibrated prior to use, as required by Multi-Site SOP SAS-02-01 from the Multi-Site FSP.

Subsurface soil samples will be collected from all delineation borings as follows:

- For borings that show no visual, olfactory, or PID indication of impacts, one sample will be collected in the upper four feet to characterize direct contact risks, one sample will be collected within the 2-foot interval above the clay confining layer, and one sample will be collected from the 2-foot interval within the clay confining layer immediately below the fill unit.
- For borings that indicate the presence of contamination (through visual, olfactory, or PID indication), a sample of impacted material will be collected. A second sample will also be collected below the interval(s) of potential MGP impacts, to document vertical extent. Soils will be collected in both fill and clay units as encountered. A third sample will be collected from the upper four feet to characterize direct contact risks.

All soil samples will be submitted to a Wisconsin certified laboratory (Pace Analytical of Green Bay, Wisconsin or EurofinsTest America, Chicago, IL) for COPCs identified in the SSWP Revision 2 including:

- Petroleum volatile organic compounds (PVOCs) via USEPA Method 8260 (Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene)
- Polycyclic aromatic hydrocarbons (PAHs) via USEPA Method 8270 (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)
- Total Metals via USEPA Method 6020A (Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver) and total Mercury via USEPA Method 7471.
- Total cyanide via USEPA Method 9012B

A sampling and analysis plan summary is presented in Table 2. Data will undergo data validation by a third-party data validator.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

## **Well Installation and Groundwater Sampling**

### **Well installation**

Following soil boring installation, five pairs of monitoring wells will be installed as shown on Figure 5. At each well pair, one well will be fully screened within the clay unit just below the fill and one well will be fully screened within the fill unit. The objective of positioning well screens specific to each unit is to understand

contaminant mass and potential migration within each of the hydrostratigraphic/lithologic units<sup>1</sup>.

Groundwater samples will be collected from both wells to determine if the contaminant mass contributing to groundwater impacts observed to date in the cross-unit screened wells is predominantly related to principal threat waste in clay fractures or residual principal threat waste in the fill unit. Two well pairs will be located to the south and west of the previous remedial area, two well pairs will be located within the previous remedial area, and one well pair will be located adjacent to the former piping removal area.

Wells will be constructed according to Multi-Site SOP SAS-05-03, and threaded joints will be tightened per manufacturer requirements. A 2-inch inner diameter poly vinyl chloride well with a 0.01-inch factory slotted screen will be installed, and the annular space around the wells will be backfilled with filter pack, bentonite seal, and finished with a steel flush mount cover. The overall depth of the well and the corresponding length of well screen will be determined in the field by the Ramboll field personnel, based on subsurface information collected during soil boring advancement. The following guidelines will be considered when selecting screen placement and length:

- A minimum 3-foot annular seal is preferred; however, a shorter seal length (minimum 2-feet) is acceptable if dictated by field conditions.
- Monitoring well screens will be 5 feet in length. Shorter screens may be considered if dictated by field conditions.
- In each well pair, the bottom of the effective screen interval (i.e., lowermost sand pack) for the shallow well shall be placed approximately 1 foot above the fill-clay interface to limit the potential for cross contamination between the two lithological units. In each well pair, the top of the effective screen (i.e., uppermost sand pack) for the deep well shall be placed approximately 2 feet below the fill-clay interface.
- Each deep well where oil-wetted/oil-coated clay was observed will be constructed with a sump that is a minimum of 2 feet long to allow for the accumulation of mobile DNAPL if present. The top of the sump (base of the screen) will be placed at the interface of the fissured clay (if present) and competent clay. The annular space around the sump will be sealed with grout or bentonite. A minimum of 6" of filter pack will be placed between the bentonite and well screen to prevent smearing of bentonite near the well screen. Locations without oil-wetted/oil-coated observations will not have a sump installed.
- Sumps will not be installed at the capillary interface between the fill unit and the fissured clay unit in the shallow wells for the following reasons:
  - The expected fill thickness (<8 feet) limits the available space for placing the well with an appropriate annular seal.
  - A two-foot sump would require drilling into the clay unit which may potentially cause cross-contamination/screening between the fill and clay units. The primary goal of the groundwater investigation is to determine if the contaminant mass contributing to groundwater impacts is predominantly related to principal threat waste in clay fractures or residual principal threat waste in the fill unit. The inclusion of sumps with the shallow groundwater wells poses a risk of cross contaminating across hydrostratigraphic units in the shallow wells. However, sumps may be installed on shallow wells if field observations of oil-wetted/oil-coated material above the unit interface indicate that sumps can be installed without causing cross-contamination of the two units.

- Adjacent to locations SB-712 and SB-706, existing wells (MW-401AR and MW-403R) are currently screened across both hydrostratigraphic units. At these locations, if oil-wetted/oil-coated material is observed near the fill-clay interface, the existing adjacent monitoring well that is screened across both units will be used to monitor DNAPL accumulation. If the adjacent deep clay well with a sump (which is hydraulically isolated from the fill) accumulates DNAPL as well, then it will be inferred that the fractured clay is a source of the DNAPL. These results in combination with the fill well, the cross-unit well, and the visual logging of the soil boring will be considered to evaluate the source of groundwater impacts.

### **Well Development**

Following installation, wells will be developed in accordance with Multi-Site SOP SAS-05-04. Wells will be developed using an electric submersible pump for surging and pumping. Field parameters—specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity—will be measured during development. Wells will be considered developed when field parameters meet the stabilization criteria detailed in Multi-Site SOP SAS-05-04.

### **Groundwater Sampling**

Each well will be sampled for groundwater COPCs, using low-flow sample techniques, in accordance with Multi-Site SOP SAS-08-02. Groundwater sampling will be conducted within two months following well installation. Field parameters—specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity—will be measured using a flow-through cell. Samples will be submitted to Pace of Green Bay, Wisconsin for groundwater COPCs identified in the SSWP Revision 2 including:

- PVOCs including BTEX, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene via USEPA Method 8260
- PAHs via USEPA Method 8270 (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)
- Total Metals via USEPA Method 6020A (Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver) and total mercury via USEPA Method 7471.
- Nitrate and Nitrite via USEPA method 353.2
- Sulfate via USEPA Method 300

A sampling and analysis plan summary is presented in Table 2. Data will undergo data validation by a third-party data validator.

If the schedule allows, sampling of the newly installed wells will be conducted at the same time as semi-annual sampling of existing wells.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

The need for additional sampling at these wells will be evaluated once the results of the initial round of sampling have been received. A minimum of four semi-annual groundwater sampling events is anticipated. A recommendation for either abandonment or incorporation into the long-term monitoring network will be provided in the Remedial Investigation Report.

## **Observation of DNAPL Accumulation**

Following installation and development of new wells, the thickness of DNAPL in the wells (if present) will be measured on a consistent monthly basis for three months, using a weighted cotton string or interface probe. After three months, the gauging frequency will be reduced to semi-annually to coordinate with the planned semi-annual groundwater monitoring events.

## **Schedule and Reporting**

Soil boring and monitoring well installation is proposed to be completed in late July 2023 following USEPA-approval of this work plan. Results of the investigation will be incorporated into a Remedial Investigation Report, which will be submitted by the end of 2023.

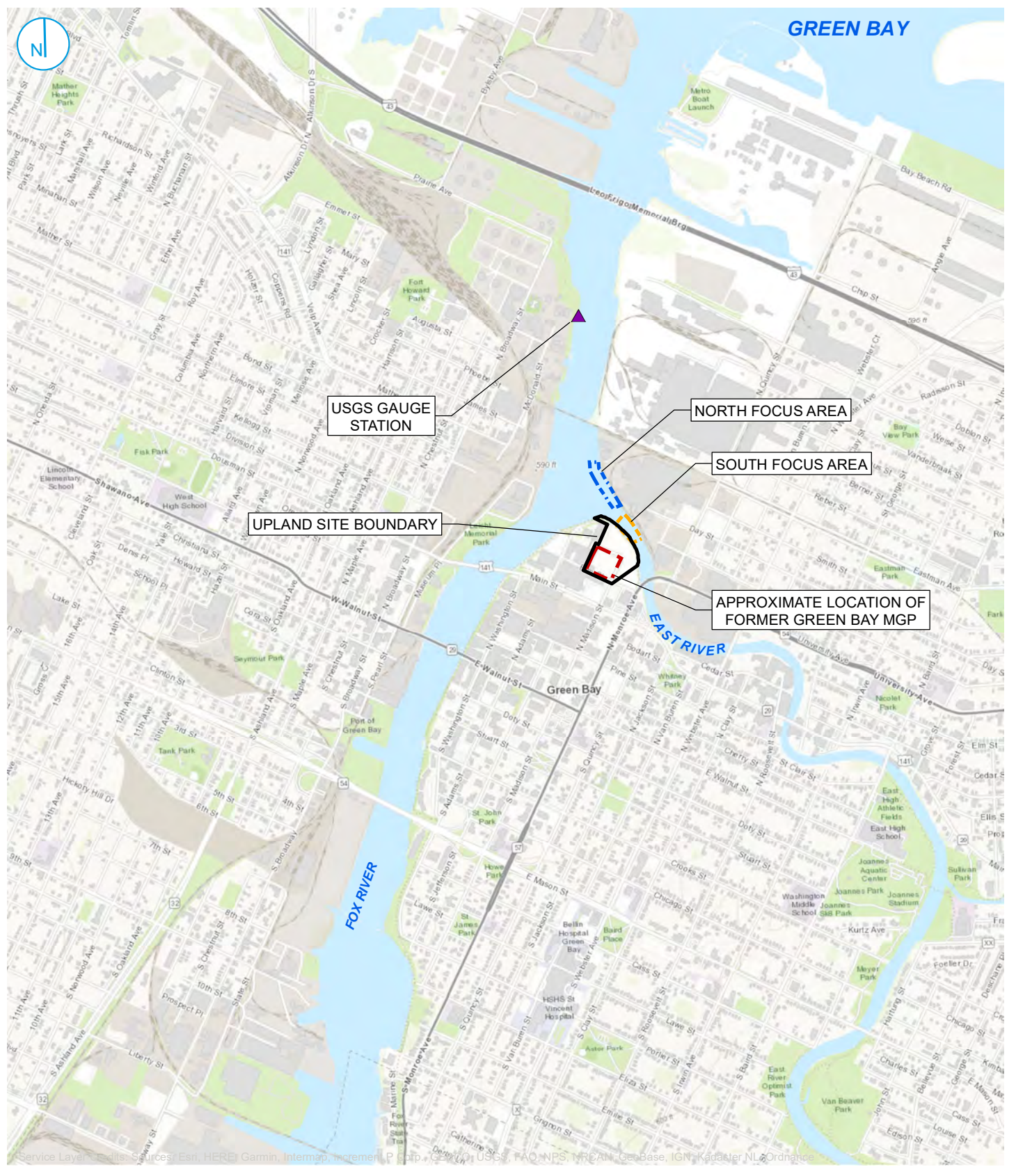
## **References**

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- Ramboll, 2020b. Upland Remedial Investigation Data Summary Report, Former Green Bay Manufactured Gas Plant Site Operable Unit 1. September 18.
- Ramboll, 2022. Early Removal Action Work Plan, Former Green Bay Manufactured Gas Plant, Revision 2. September 26.

## **Attachments**

- Figure 1 – Site Location Map
- Figure 2 – Site Layout Map
- Figure 3 – Soil Remediation Excavation Areas
- Figure 4a – Geologic Cross Section D-D'
- Figure 4b – Geologic Cross Sections E-E' and F-F'
- Figure 4c – Geologic Cross Section G-G' and H-H'
- Figure 5 – Proposed Soil Borings and Monitoring Wells
- Table 1 – 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria
- Table 2 – Sampling and Analysis Plan

## FIGURES



### SITE LOCATION MAP

### FIGURE 1

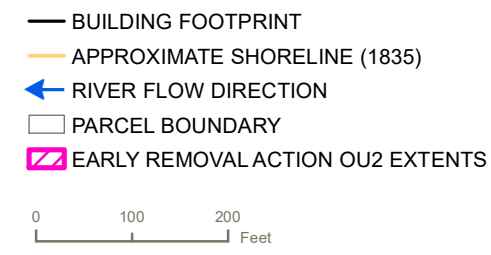
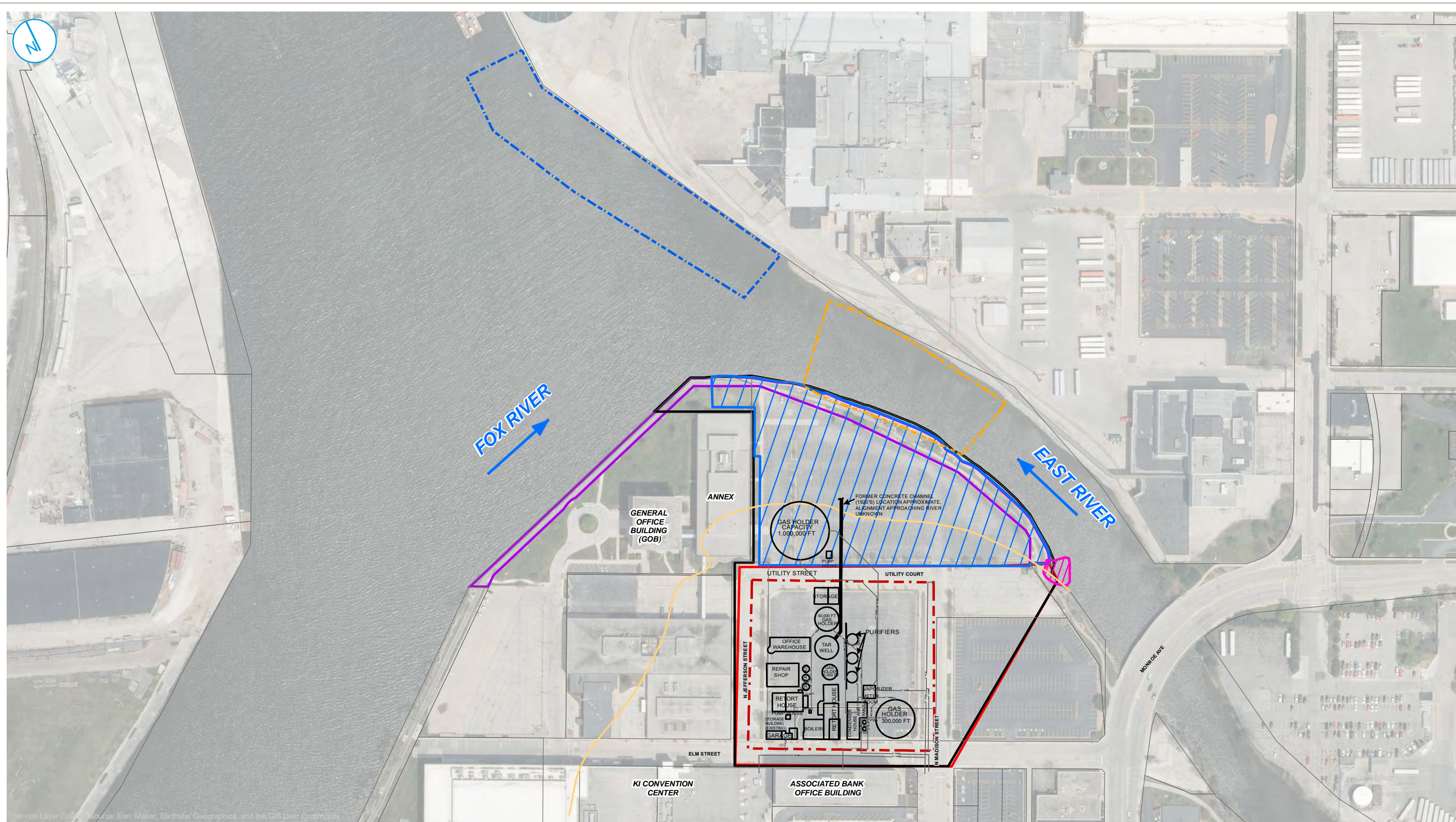
Map Scale: 1:124,000;  
Map Center: 88°0'52"W 44°31'3"N

**SITE SPECIFIC WORK PLAN ADDENDUM NO.1**  
FORMER GREEN BAY MANUFACTURED GAS PLANT  
WISCONSIN PUBLIC SERVICE CORPORATION  
CITY OF GREEN BAY, WISCONSIN

RAMBOLL US CORPORATION  
A RAMBOLL COMPANY







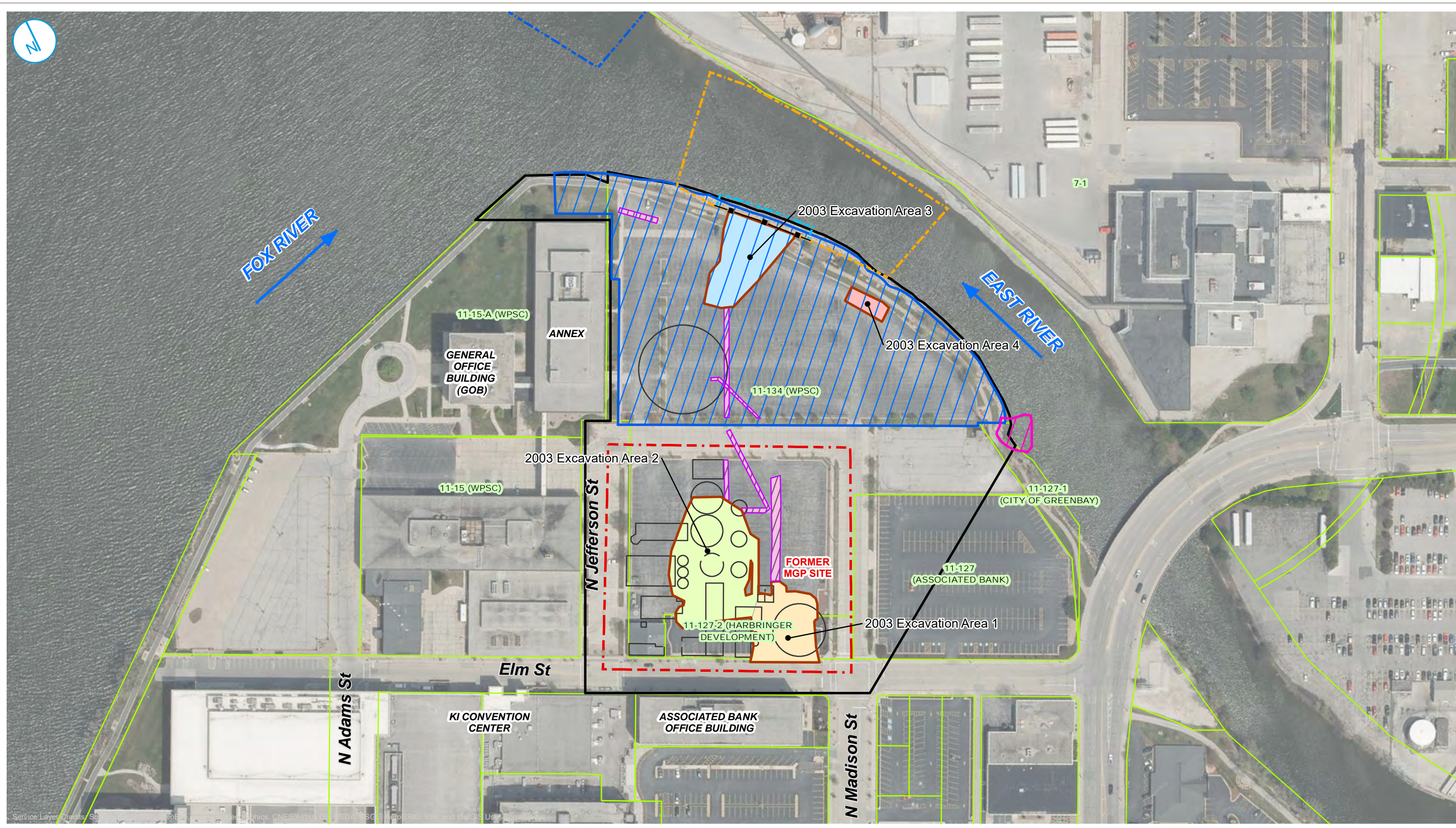
**SITE LAYOUT**

**FIGURE 2**

**SITE SPECIFIC WORK PLAN ADDENDUM NO. 1**  
**FORMER GREEN BAY MANUFACTURED GAS PLANT**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

RAMBOLL US CORPORATION  
 A RAMBOLL COMPANY



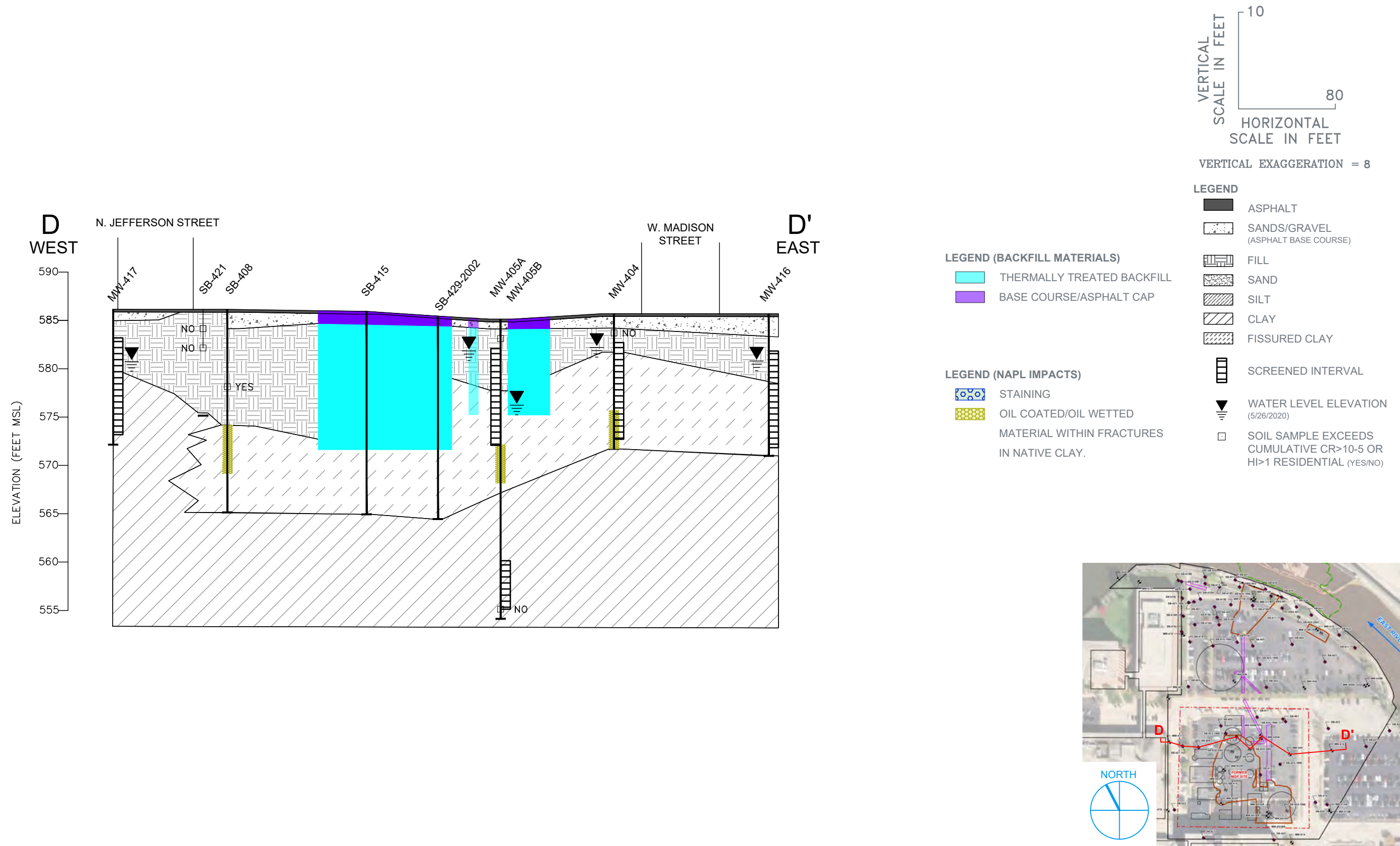


- |   |   |                             |   |
|---|---|-----------------------------|---|
| UPLAND SITE BOUNDARY  | TAX PARCEL (OWNER)                                | EXCAVATION AREA 1 (6-8)     | NORTH FOCUS AREA (OU2)                            |
| FORMER MGP SITE   | FORMER STRUCTURE                                  | EXCAVATION AREA 2 (8-14 FT) | SOUTH FOCUS AREA (OU2)                            |
| SHEET PILE WALL   | SOIL REMEDIATION EXCAVATION AREAS (2003)          | *TAR WELL (12-22 FT)        | EARLY REMOVAL ACTION OU1 EXTENTS 2023 IN PROGRESS |
| SHORELINE EXCAVATION EXTENT (REMEDIAL ACTION COMPLETED IN 2018) | SOIL REMEDIATION MGP PIPING RUNS (2003)           | EXCAVATION AREA 3 (8-12)    |   |
|   | EXCAVATED PIPING RUN                              | EXCAVATION AREA 4 (7)       |   |
|   | EARLY REMOVAL ACTION OU2 EXTENTS 2023 IN PROGRESS |                             |   |

**SOIL REMEDIATION EXCAVATION AREAS**

**SITE SPECIFIC WORK PLAN ADDENDUM NO. 1**  
**FORMER GREEN BAY MANUFACTURED GAS PLANT**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

**FIGURE 3**



**NOTES**

- CROSS SECTION REPRESENTS A GENERALIZED INTERPRETATION OF SUBSURFACE CONDITIONS. STRATUM LINES ARE BASED ON INTERPOLATION BETWEEN BORINGS AND MAY NOT REPRESENT ACUTAL SUBSURFACE CONDITIONS. FOR DETAILED DESCRIPTION OF INDIVIDUAL BORINGS, REFER TO SOIL BORING LOGS.
- FORMER STURCTURES SHOWN WHERE BASE WAS FIELD CONFIRMED BY INVESTIGATION.

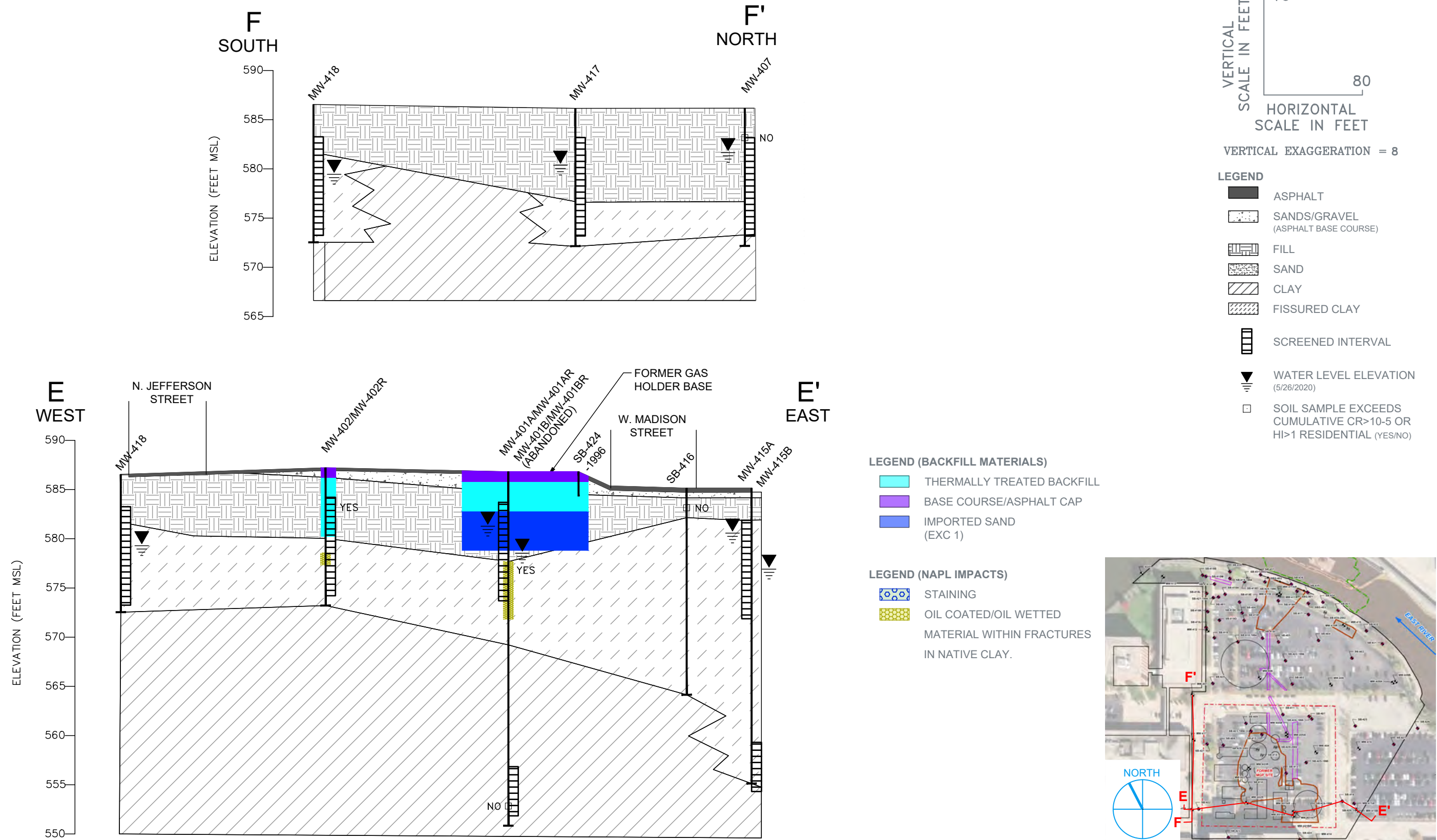
**GEOLOGIC CROSS SECTIONS D-D'**

**SITE SPECIFIC WORK PLAN ADDENDUM NO. 1**  
**FORMER GREEN BAY MANUFACTURED GAS PLANT SITE**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

**FIGURE 4A**

RAMBOLL US CORPORATION  
 A RAMBOLL COMPANY





**NOTES**

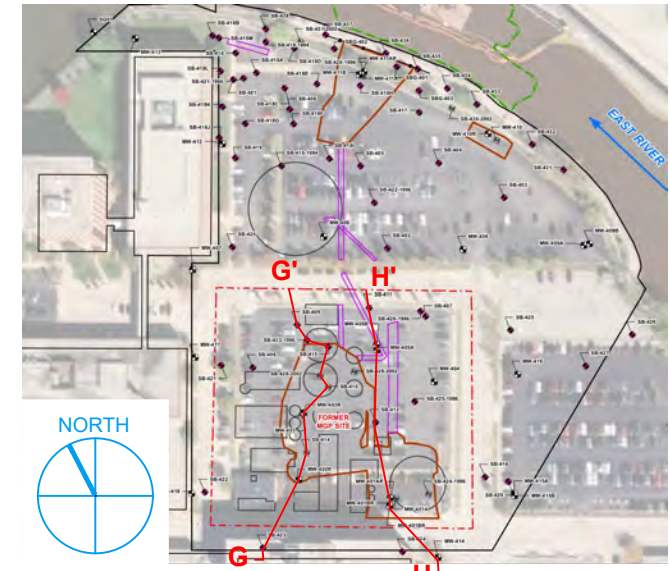
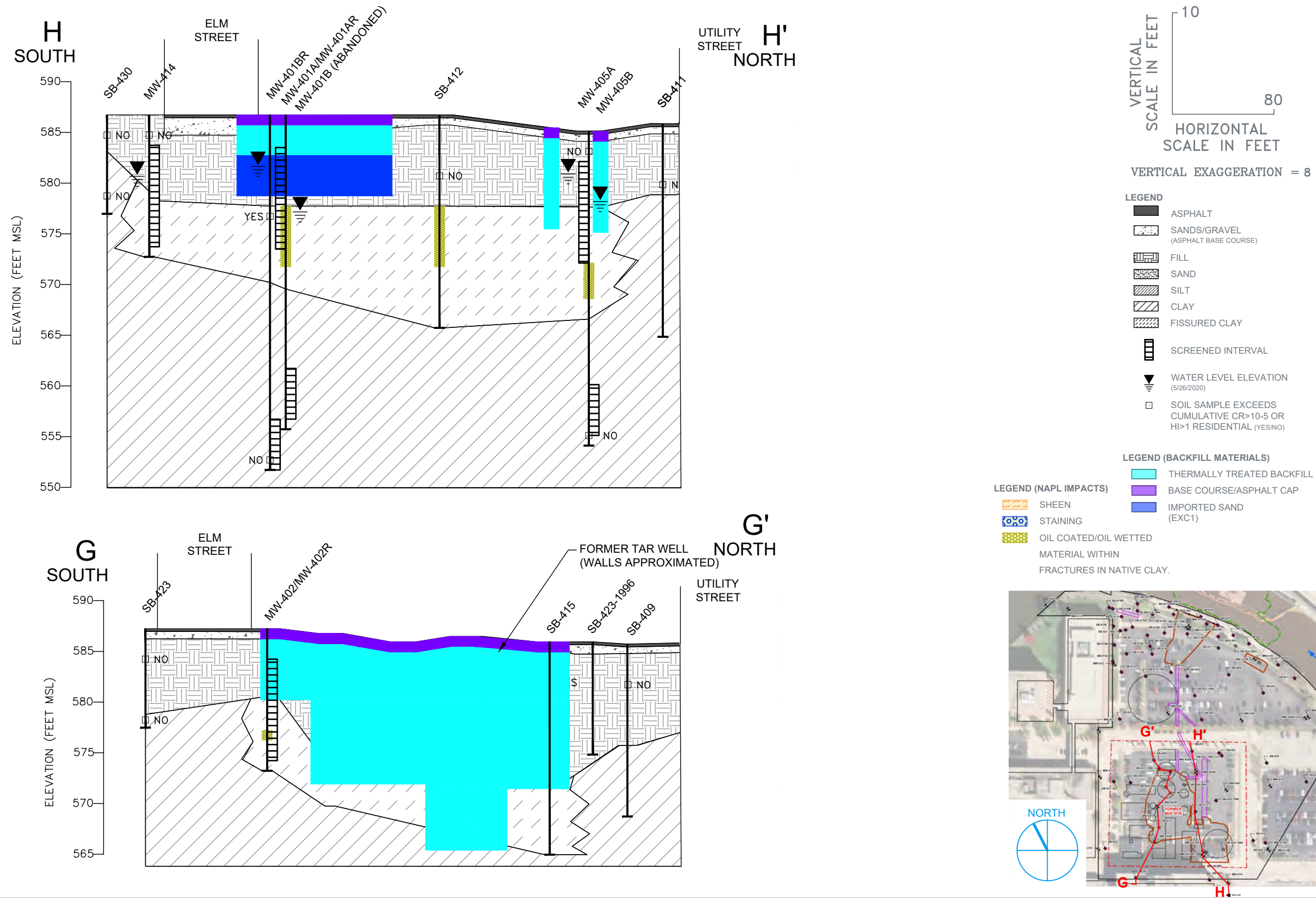
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- FORMER STURCTURES SHOWN WHERE BASE WAS FIELD CONFIRMED BY INVESTIGATION.

**GEOLOGIC CROSS SECTIONS E-E' AND F-F'**

**SITE SPECIFIC WORK PLAN ADDENDUM NO. 1**  
**FORMER GREEN BAY MANUFACTURED GAS PLANT SITE**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

RAMBOLL US CORPORATION  
 A RAMBOLL COMPANY





- NOTES**
- CROSS SECTION REPRESENTS A GENERALIZED INTERPRETATION OF SUBSURFACE CONDITIONS. STRATUM LINES ARE BASED ON INTERPOLATION BETWEEN BORINGS AND MAY NOT REPRESENT ACUTAL SUBSURFACE CONDITIONS. FOR DETAILED DESCRIPTION OF INDIVIDUAL BORINGS, REFER TO SOIL BORING LOGS.
  - FORMER STURCTURES SHOWN WHERE BASE WAS FIELD CONFIRMED BY INVESTIGATION.

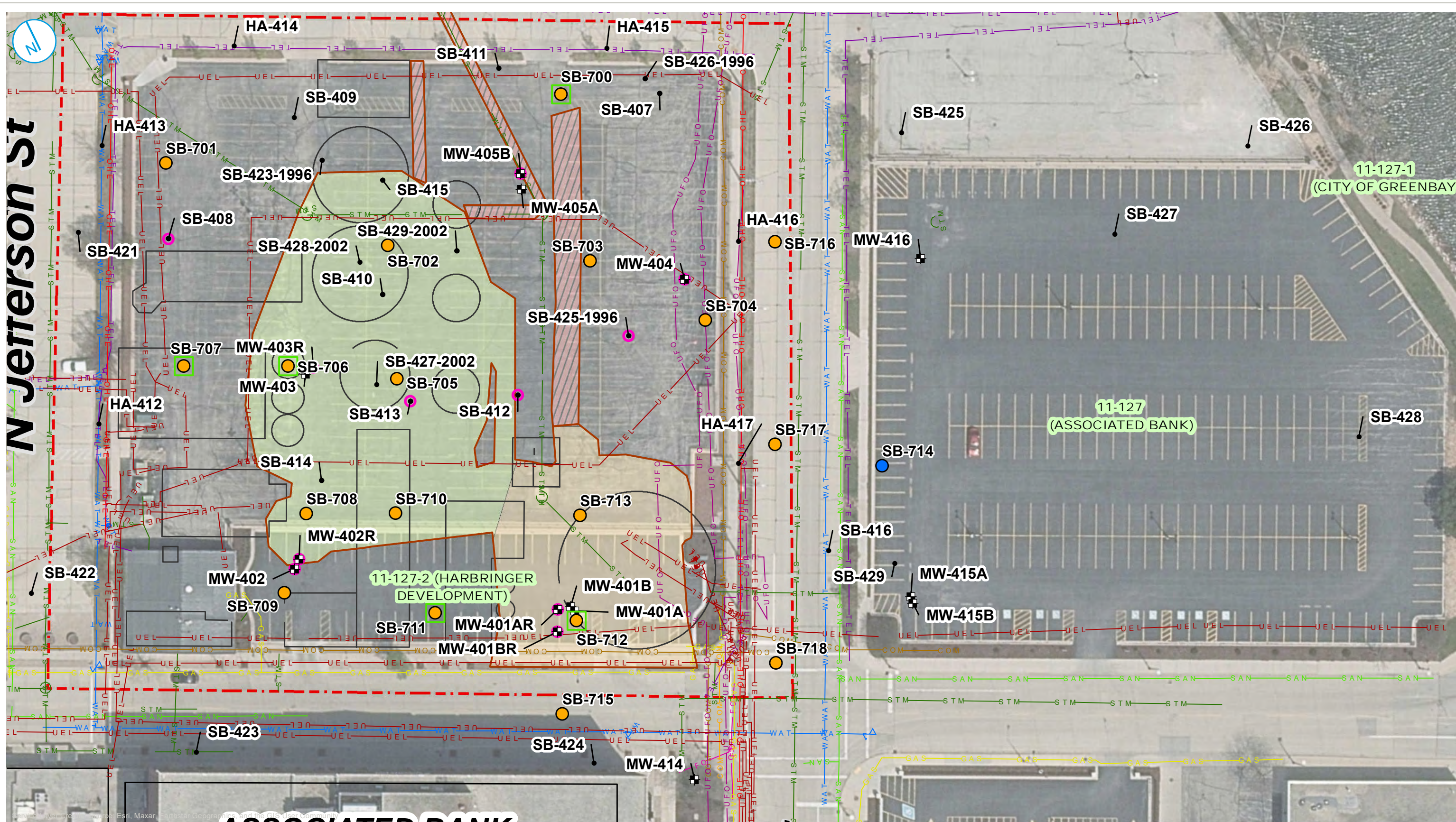
**GEOLOGIC CROSS SECTIONS G-G' AND H-H'**

**SITE SPECIFIC WORK PLAN ADDENDUM NO. 1**  
**FORMER GREEN BAY MANUFACTURED GAS PLANT SITE**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

**FIGURE 4C**

RAMBOLL US CORPORATION  
 A RAMBOLL COMPANY





- FORMER MGP SITE
- BUILDING FOOTPRINT
- FORMER STRUCTURE
- SOIL REMEDIATION EXCAVATION AREAS (2003)
- OIL WETTED-COATED MATERIAL WITHIN FRACTURES OF NATIVE CLAY
- SOIL BORING
- EXCAVATION AREA 1 (6-8 FT)
- EXCAVATION AREA 2 (8-14 FT)
- \*TAR WELL (12-22 FT)
- EXCAVATED PIPING RUN
- MONITORING WELL LOCATION
- PROPOSED CONTINGENT SOIL BORING
- PROPOSED PRIMARY SOIL BORINGS
- PROPOSED WELL PAIRS
- ABOVE GROUND COMMUNICATION
- FIBER OPTIC LINE
- GAS LINE
- OVERHEAD ELECTRIC LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- TELEPHONE LINE
- UNDERGROUND COMMUNICATION
- UNDERGROUND ELECTRIC LINE
- UNDERGROUND FIBER OPTIC LINE
- WATER LINE

### PROPOSED SOIL BORINGS AND MONITORING WELLS

**UPLAND REMEDIAL INVESTIGATION DATA SUMMARY**  
**REPORT FORMER GREEN BAY MANUFACTURED GAS PLANT**  
 WISCONSIN PUBLIC SERVICE CORPORATION  
 GREEN BAY, WISCONSIN

FIGURE 5



## **TABLES**

**Table 1. 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria**

Site-Specific Work Plan Addendum 1  
 Wisconsin Public Service Corporation  
 Green Bay Former Manufactured Gas Plant Site  
 700 N Adams St, Green Bay, Wisconsin  
 BRRTS#: 02-05-000254 USEPA#: WIN000509948

9-digit Code	Sample Location	Sample Date	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	Metal	Metal	Metal	Metal	Metal	Metal
			1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Trimethylbenzenes, Total	Benzene	Ethylbenzene	Toluene	Xylene, o	Xylenes, m + p	Xylenes, Total	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	Aluminum, Total	Antimony, Total	Arsenic, Dissolved	Arsenic, Total	Barium, Dissolved	Barium, Total
			μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L	μg/L
WI Groundwater SL:			NS	NS	480	5	700	800	NS	NS	2,000	NS	NS	NS	NS	3,000	NS	0.2	0.2	NS	NS	0.2	NS	400	400	NS	100	3,000	250	200	6	10	10	2,000	2,000
WI Groundwater PAL:			NS	NS	96	0.5	140	160	NS	NS	400	NS	NS	NS	NS	600	NS	0.02	0.02	NS	NS	0.02	NS	80	80	NS	10	NS	50	40	1.2	1	1	400	400
Tap Water RSL:			56	60	NS	0.46	1.5	1,100	190	190	190	1.1	36	530	530	1,800	0.03	0.025	0.25	120	2.5	25	0.025	800	290	0.25	0.12	1,800	120	20,000	7.8	0.052	0.052	3,800	3,800
053018008	MW-401BR	05/30/2018	0.50 U	0.50 U	1.00 U	0.50 U	0.50 U	0.50 U	0.50 U	1.0 U	1.5 U	0.0060 U	0.0050 U	0.0062 U	0.0051 U	0.011 U	0.0077 U	0.011 U	0.029 J	0.024 J	0.015 J	0.036 J	0.010 U	0.053 J	0.0081 U	0.019 J	0.019 U	0.024 J	0.044	--	--	0.56 U	--	25.2	--
052919009	MW-401BR	05/29/2019	0.84 U	0.87 U	1.71 U	0.25 U	0.22 U	0.17 U	0.26 U	0.47 U	1.5 U	0.12	0.027 J	0.025 U	0.24	0.23	0.10 J	0.23	0.17	0.14 J	0.24 J	0.042 U	0.43	0.051 J	0.10 J	0.076 U	0.17 J	0.89	--	--	2.8 U	--	35.7 J	--	
110619024	MW-401BR	11/06/2019	3.1	1.5 J	4.6	0.25 U	0.59 J	0.17 U	1.4	0.93 J	2.3 J	0.37	0.28	0.094	0.032	0.030 J	0.15	0.12	0.22	0.14	0.099	0.27 J	0.021 J	0.51	0.15	0.091 J	0.36	0.39	0.77	--	--	2.8 U	--	37.4	--



Table 1. 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria

Site-Specific Work Plan Addendum 1
Wisconsin Public Service Corporation
Green Bay Former Manufactured Gas Plant Site
700 N Adams St, Green Bay, Wisconsin
BRRTS#: 02-05-000254 USEPA#: WIN000509948

Table with columns for 9-digit Code, Sample Location, Sample Date, and various chemical categories (VOC, PAH, Metals) with their respective units and values. Includes summary rows for Groundwater SL, PAL, and Tap Water RSL.





**Table 1. 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria**

Site-Specific Work Plan Addendum 1  
 Wisconsin Public Service Corporation  
 Green Bay Former Manufactured Gas Plant Site  
 700 N Adams St, Green Bay, Wisconsin  
 BRRTS#: 02-05-000254 USEPA#: WIN000509948

9-digit Code	Sample Location	Sample Date	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PVOC	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	Metal	Metal	Metal	Metal	Metal	Metal		
			1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Trimethylbenzenes, Total	Benzene	Ethylbenzene	Toluene	Xylene, o	Xylenes, m + p	Xylenes, Total	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	Aluminum, Total	Antimony, Total	Arsenic, Dissolved	Arsenic, Total	Barium, Dissolved	Barium, Total	
Reporting Units:			µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	
<b>WI Groundwater SL:</b>			<b>NS</b>	<b>NS</b>	<b>480</b>	<b>5</b>	<b>700</b>	<b>800</b>	<b>NS</b>	<b>NS</b>	<b>2,000</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>3,000</b>	<b>NS</b>	<b>0.2</b>	<b>0.2</b>	<b>NS</b>	<b>NS</b>	<b>0.2</b>	<b>NS</b>	<b>400</b>	<b>400</b>	<b>NS</b>	<b>100</b>	<b>3,000</b>	<b>250</b>	<b>200</b>	<b>6</b>	<b>10</b>	<b>10</b>	<b>2,000</b>	<b>2,000</b>	
<b>WI Groundwater PAL:</b>			<b>NS</b>	<b>NS</b>	<b>96</b>	<b>0.5</b>	<b>140</b>	<b>160</b>	<b>NS</b>	<b>NS</b>	<b>400</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>600</b>	<b>NS</b>	<b>0.02</b>	<b>0.02</b>	<b>NS</b>	<b>NS</b>	<b>0.02</b>	<b>NS</b>	<b>80</b>	<b>80</b>	<b>NS</b>	<b>10</b>	<b>NS</b>	<b>50</b>	<b>40</b>	<b>1.2</b>	<b>1</b>	<b>1</b>	<b>400</b>	<b>400</b>	
<b>Tap Water RSL:</b>			<b>56</b>	<b>60</b>	<b>NS</b>	<b>0.46</b>	<b>1.5</b>	<b>1,100</b>	<b>190</b>	<b>190</b>	<b>190</b>	<b>1.1</b>	<b>36</b>	<b>530</b>	<b>530</b>	<b>1,800</b>	<b>0.03</b>	<b>0.025</b>	<b>0.25</b>	<b>120</b>	<b>2.5</b>	<b>25</b>	<b>0.025</b>	<b>800</b>	<b>290</b>	<b>0.25</b>	<b>0.12</b>	<b>1,800</b>	<b>120</b>	<b>20,000</b>	<b>7.8</b>	<b>0.052</b>	<b>0.052</b>	<b>3,800</b>	<b>3,800</b>	
052918001	MW-418	05/29/2018	0.50 U	0.50 U	1.00 U	0.50 U	0.50 U	0.50 U	1.0 U	1.5 U	0.0058 U	0.0048 U	0.0060 U	0.0049 U	0.010 U	0.0074 U	0.010 U	0.0056 U	0.0066 U	0.0074 U	0.013 U	0.0098 U	0.010 U	0.0078 U	0.017 U	0.018 U	0.014 U	0.0075 U	--	--	0.56 U	--	223	--		
110518001	MW-418	11/05/2018	0.84 U	0.87 U	1.71 U	0.25 U	0.22 U	0.17 U	0.26 U	0.47 U	1.5 U	0.0061 U	0.0051 U	0.0063 U	0.0051 U	0.011 U	0.0078 U	0.011 U	0.0059 U	0.0070 U	0.0078 U	0.013 U	0.010 U	0.011 U	0.0082 U	0.018 U	0.019 U	0.014 U	0.0079 U	--	--	2.6 J	--	283	--	
052819001	MW-418	05/28/2019	0.84 U	0.87 U	1.71 U	0.25 U	0.22 U	0.17 U	0.26 U	0.47 U	1.5 U	0.0077 J	0.0095 J	0.0067 U	0.0055 U	0.012 U	0.038 J	0.012 U	0.015 J	0.0096 J	0.014 J	0.017 J	0.011 U	0.026 J	0.0089 U	0.020 U	0.020 U	0.026 J	0.027 J	--	--	0.44 J	--	227	--	
110419001	MW-418	11/04/2019	0.84 U	0.87 U	1.71 U	0.25 U	0.22 U	0.17 U	0.26 U	0.47 U	1.5 U	0.0089 J	0.013 J	0.0061 J	0.0046 U	0.0096 U	0.025 J	0.038 J	0.072 J	0.045	0.039	0.066	0.0092 U	0.097	0.0073 U	0.034 J	0.017 U	0.045 J	0.11	--	--	0.76 J	--	270	--	
052620001	MW-418	05/26/2020	0.84 U	0.87 U	1.71 U	0.25 U	0.32 U	0.27 U	0.26 U	0.47 U	1.5 U	0.0060 J	0.0085 J	0.0059 U	0.0048 U	0.010 U	0.0073 U	0.010 U	0.0059 J	0.0066 U	0.0073 U	0.013 U	0.0097 U	0.012 J	0.0077 U	0.017 U	0.023 J	0.013 U	0.010 J	--	--	1.2 J	--	142	--	
110220001	MW-418	11/02/2020	0.84 U	0.87 U	1.71 U	0.25 U	0.32 U	0.27 U	0.26 U	0.47 U	1.5 U	0.0061 U	0.0051 U	0.0063 U	0.0051 U	0.011 U	0.0078 U	0.011 U	0.0059 U	0.0070 U	0.0078 U	0.013 U	0.010 U	0.011 U	0.0082 U	0.018 U	0.019 U	0.014 U	0.0079 U	--	--	1.2 J	--	177	--	
052421001	MW-418	05/24/2021	0.45 U	0.36 U	0.81 U	0.30 U	0.33 U	0.29 U	0.35 U	0.70 U	1.0 U	0.032	0.043	0.0060 U	0.0052 J	0.010 U	0.0074 U	0.010 U	0.0056 U	0.0066 U	0.0074 U	0.013 U	0.0098 U	0.010 U	0.0078 U	0.017 U	0.18	0.020 J	0.0081 J	--	--	--	1.1 J	--	307	--
110121001	MW-418	11/01/2021	0.45 U	0.36 U	0.81 U	0.30 U	0.33 U	0.29 U	0.35 U	0.70 U	1.0 U	0.028 J	0.032 J	0.013 U	0.012 U	0.017 U	0.013 U	0.018 U	0.018 U	0.022 U	0.021 U	0.025 U	0.017 U	0.024 U	0.022 U	0.014 U	0.042 J	0.024 U	0.021 U	--	--	0.56 U	--	291	--	
050922001	MW-418	05/09/2022	0.45 U	0.36 U	0.81 U	0.30 U	0.33 U	0.29 U	0.35 U	0.70 U	1.0 U	0.017 U	0.013 U	0.014 U	0.012 U	0.018 U	0.013 U	0.019 U	0.019 U	0.023 U	0.022 U	0.026 U	0.017 U	0.025 U	0.023 U	0.015 U	0.019 U	0.025 U	0.022 U	--	--	--	0.56 J	--	142	--
110722001	MW-418	11/07/2022	0.45 U	0.36 U	0.81 U	0.30 U	0.33 U	0.29 U	0.35 U	0.70 U	1.0 U	0.019 U	0.014 U	0.015 U	0.013 U	0.019 U	0.014 U	0.013 U	0.0095 U	0.024 U	0.023 U	0.013 U	0.019 U	0.027 U	0.025 U	0.016 U	0.021 U	0.027 U	0.024 U	--	--	--	0.56 U	--	215	--







Table 1. 2018-2022 Groundwater Analytical Results Cc

Site-Specific Work Plan Addendum 1  
Wisconsin Public Service Corporation  
Green Bay Former Manufactured Gas Plant Site  
700 N Adams St, Green Bay, Wisconsin  
BRRTS#: 02-05-000254 USEPA#: WIN000509948

Table with 28 columns: 9-digit Code, Sample Location, Sample Date, and 25 analytical parameters (Metals, Inorganic, Organic, Field). Includes reporting units and regulatory limits (WI Groundwater SL, PAL, Tap Water RSL). Data rows include MW-414, MW-415A, MW-415B, and MW-416 samples from 2018 to 2022.





**Table 1. 2018-2022 Groundwater Analytical Results Cc**

Site-Specific Work Plan Addendum 1  
 Wisconsin Public Service Corporation  
 Green Bay Former Manufactured Gas Plant Site  
 700 N Adams St, Green Bay, Wisconsin  
 BRRTS#: 02-05-000254 USEPA#: WIN000509948

9-digit Code	Sample Location	Sample Date	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Metal	Inorganic	Inorganic	Inorganic	Organic	Field	Field	Field	Field	Field	Field	Field	
			Cadmium, Dissolved	Cadmium, Total	Chromium, Dissolved	Chromium, Total	Copper, Total	Iron, Dissolved	Iron, Total	Lead, Dissolved	Lead, Total	Manganese, Dissolved	Manganese, Total	Mercury, Dissolved	Mercury, Total	Nickel, Total	Selenium, Dissolved	Selenium, Total	Silver, Dissolved	Silver, Total	Vanadium, Total	Zinc, Total	Chloride, Total	Nitrogen, NO2 + NO3, Total	Sulfate, Total	Methane	Dissolved oxygen	Groundwater, depth to	Oxidation Reduction Potential	pH, Field	Specific Conductance, Field	Temperature, Water	Turbidity, Quantitative
Reporting Units:			µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	mg/L	feet	millivolts	s.u.	µS/cm	Deg C	NTUs		
<b>WI Groundwater SL:</b>			<b>5</b>	<b>5</b>	<b>100</b>	<b>100</b>	<b>1,300</b>	<b>NS</b>	<b>NS</b>	<b>15</b>	<b>15</b>	<b>300</b>	<b>300</b>	<b>2</b>	<b>2</b>	<b>100</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>30</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>		
<b>WI Groundwater PAL:</b>			<b>0.5</b>	<b>0.5</b>	<b>10</b>	<b>10</b>	<b>130</b>	<b>150</b>	<b>150</b>	<b>1.5</b>	<b>1.5</b>	<b>60</b>	<b>60</b>	<b>0.2</b>	<b>0.2</b>	<b>20</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>6</b>	<b>2,500</b>	<b>125,000</b>	<b>2,000</b>	<b>125,000</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>		
<b>Tap Water RSL:</b>			<b>1.8</b>	<b>1.8</b>	<b>22,000</b>	<b>22,000</b>	<b>800</b>	<b>14,000</b>	<b>14,000</b>	<b>15</b>	<b>15</b>	<b>430</b>	<b>430</b>	<b>5.7</b>	<b>5.7</b>	<b>390</b>	<b>100</b>	<b>100</b>	<b>94</b>	<b>94</b>	<b>86</b>	<b>6,000</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>	<b>NS</b>		
052918001	MW-418	05/29/2018	0.16 U	--	2.0 U	--	--	221 U	--	0.39 U	--	23.6	--	0.13 U	--	--	12.5	--	0.20 U	--	--	--	--	6,500	69,000	--	4.21	5.82	214.1	6.80	3,477	16.34	5.27
110518001	MW-418	11/05/2018	2.2 J	--	5.1 U	--	--	553 U	--	2.3 J	--	365	--	0.084 U	--	--	5.8	--	0.93 J	--	--	--	--	3,400	84,800	--	0.46	6.11	227.0	6.88	3,189.6	15.57	4.34
052819001	MW-418	05/28/2019	0.15 U	--	1.0 U	--	--	111 U	--	0.24 U	--	185	--	0.084 U	--	--	10.7	--	0.10 U	--	--	--	--	5,600	86,800	--	0.24	5.13	248.3	6.75	5,596	12.70	5.28
110419001	MW-418	11/04/2019	0.30 U	--	2.0 U	--	--	116 U	--	0.47 U	--	165	--	0.084 U	--	--	5.4	--	0.25 U	--	--	--	--	3,800	65,500	--	0.25	5.81	178.6	6.76	6,288.6	16.33	0.00
052620001	MW-418	05/26/2020	0.83 J	--	2.0 U	--	--	116 U	--	1.0 J	--	128	--	0.084 U	--	--	3.0	--	0.42 J	--	--	--	--	2,000	50,400	0.66 U	0.56	5.36	228.6	7.18	6,146.5	35.63	1.62
110220001	MW-418	11/02/2020	0.58 J	--	2.0 U	--	--	116 U	--	0.57 J	--	294	--	0.066 U	--	--	3.3	--	0.25 U	--	--	--	--	1,700	59,300	14.6	0.16	5.79	-102.3	6.83	5,512.1	16.45	0.00
052421001	MW-418	05/24/2021	--	0.55 J	--	2.0 U	--	--	116 U	--	0.72 J	--	389	--	0.066 U	--	--	5.1	--	0.25 U	--	--	--	2,700	70,500	30.0	6.81	6.14	200.2	6.76	4,956.7	16.23	0.00
110121001	MW-418	11/01/2021	0.30 U	--	2.0 U	--	--	116 U	--	0.47 U	--	779	--	0.066 U	--	--	2.6	--	0.25 U	--	--	--	--	1,400	81,800	1.3 J	0.32	6.33	57.9	6.81	5,407.7	16.00	0.00
050922001	MW-418	05/09/2022	--	0.15 U	--	1.0 U	--	--	58.0 U	--	0.24 U	--	99.1	--	0.066 U	--	--	15.3	--	0.13 U	--	--	--	7,900	59,400	1.5 J	0.00	7.30	168.5	7.18	2,776.5	14.94	5.24
110722001	MW-418	11/07/2022	--	0.45 J	--	2.0 U	--	--	116 U	--	0.60 J	--	145	--	0.066 U	--	--	10.3	--	0.25 U	--	--	--	11,300	153,000	0.77 J	7.23	4.05	227.3	6.91	2,981.7	13.96	0.00

**Table 1. 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria**

Site-Specific Work Plan Addendum 1  
 Wisconsin Public Service Corporation  
 Green Bay Former Manufactured Gas Plant Site  
 700 N Adams St, Green Bay, Wisconsin  
 BRRTS#: 02-05-000254 USEPA#: WIN000509948

<b>Bold</b>	exceeds the WI Groundwater SL
<u>Underline</u>	attains or exceeds the WI Groundwater PAL
<i>Italic</i>	exceeds the Tap Water RSL
<b>Pink Highlighting</b>	Groundwater SL exceedance; results only exceeding the PAL and/or Tap Water criteria are not highlighted.
<b>Yellow Highlighting</b>	analyte concentration exceedance in one or more samples

**Screening Levels:**  
 Screening Levels used on this table were presented in the Multi-Site Risk Assessment Framework (RAF) Addendum Revision 6, issued in August 2017. Since that time, nine revisions of the RSLs have been published by EPA through May 2022. The RSLs necessary for the MGP-related constituents evaluated in this table are up to date with the most recent revision.  
 PAL and ES from WI Administrative Code NR 140 groundwater quality standard revised effective January 2020.

**Results & Flags:**  
 -- = Analysis not performed  
 J = Estimated Concentration  
 NA = Not Applicable  
 U = Concentration was not detected above the reported limit

**Acronyms:**  
 (N) = Normalized sample locations created from combining parent and field duplicate samples following EPA protocol  
 µg/L = micrograms per liter  
 BRRTS = Bureau for Remediation and Redevelopment Tracking System  
 EPA = Environmental Protection Agency  
 MCL = Maximum Contaminant Level  
 MGP = Manufactured Gas Plant  
 NO2 + NO3 = nitrite plus nitrate  
 NS = No Screening Level/No Standard  
 PAH = Polycyclic Aromatic Hydrocarbon  
 PAL = Preventive Action Limit  
 PVOC = Petroleum Volatile Organic Compound  
 RSL = Regional Screening Level  
 SL = Screening Level  
 USEPA = United States Environmental Protection Agency  
 WI = Wisconsin

**Superscripts:**  
 1. Total Trimethylbenzenes were calculated by Ramboll as follows:  
 a. Where no detections were observed, the sum of the reporting limits is presented.  
 b. Where detections were observed, only the detected results were added together for the total summation.  
 c. Analytes used for the calculation are 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene.

Lab comments, additional data qualifiers and definitions can be found in associated laboratory reports.

**Table 2. Sampling and Analysis Plan**

Site-Specific Work Plan Addendum 1  
 Wisconsin Public Service Corporation  
 Former MGP Site - Green Bay  
 700 N. Adams Street, Green Bay, WI 54307  
 BRRTS# 02-05-000254 | USEPA# WIN000509948

Sample Type	Proposed Number of Samples	Parameter	Method	Field Duplicates <sup>1</sup> (1 extra volume)	MS/MSD <sup>2</sup> (2 extra volumes)	Equipment Blanks	Trip Blanks	Container Type	Minimum Volume	Preservation (Cool All Samples to 4° ± 2°C Unless 'None' Indicated)	Holding Time from Sample Date
Soil	54-57	PVOCs <sup>3</sup>	8260	1 per 20	1 per 20		VOC trip blanks will accompany each cooler containing VOC samples.	Glass Vial	2 oz.	NaSO4 and MeOH	48 hours to freeze 14 days to analyze
		PAHs <sup>4</sup>	8270E	1 per 20	1 per 20		--	Glass	4 oz.	--	14 days to extract 40 days to analyze
		Total Metals <sup>5</sup>	6020B/7471	1 per 20	1 per 20		--	Plastic	5 oz.	--	14 days/6 months
		Total Cyanide	9012	1 per 20	1 per 20		--	Glass	4 oz.	--	14 days
Groundwater	10	PVOCs <sup>3</sup>	8260	1 per 20	1 per 20		VOC trip blanks will accompany each cooler containing VOC samples.	Glass Vial	3-40 mL	HCl to pH<2, Zero Headspace	14 days
		PAHs <sup>4</sup>	8270E	1 per 20	1 per 20		--	Amber Glass	1 L	--	7 days to extract 40 days to analyze
		Total Metals <sup>5</sup>	6020B/7471	1 per 20	1 per 20		--	Plastic	250 mL	HNO3 to pH<2	6 months
		Sulfate	300	1 per 20	1 per 20		--	Plastic	250 mL	--	28 days
		Nitrogen (Nitrite + Nitrate)	353.2	1 per 20	1 per 20		--	Plastic	250 mL	H2SO4	28 days

Notes:

- Field duplicates will be collected at a frequency of 1 per 20 or fewer samples.
  - Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples will be collected at a frequency of 1 per group of 20 or fewer samples. Additional volume will be determined by laboratory requirements.
  - Petroleum volatile organic compounds (PVOCs) include benzene, ethylbenzene, toluene, total xylenes, and 1,2,4-trimethylbenzene
  - 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
  - Total metals include arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver
- BRRTS - Bureau for Remediation and Redevelopment Tracking System  
 BTEX - benzene, toluene, ethylbenzene and xylenes  
 L - liter  
 mL - millieter  
 MGP - manufactured gas plant  
 -- - not applicable  
 oz. - ounce  
 PAH - polycyclic aromatic hydrocarbon  
 PVOC - petroleum volatile organic compound  
 TPAH - total polycyclic aromatic hydrocarbons  
 USEPA - United States Environmental Protection Agency

# MEMO

**To:** Glenn Luke – WEC Energy Group  
**From:** Abby Small and Staci Goetz – Ramboll  
**cc:** Frank Dombrowski - -WEC Energy Group  
**Re:** Site Specific Work Plan Addendum No. 1, Revision [01](#)  
 Green Bay Former Manufactured Gas Plant, Green Bay, Wisconsin  
 Wisconsin Public Service Corporation

## BACKGROUND AND OBJECTIVE

Ramboll has prepared this Site Specific Work Plan, Addendum 1 (SSWP Addendum) on behalf of Wisconsin Public Service Corporation (WPSC) for a portion of the upland operable unit (OU1) of the Green Bay Former Manufactured Gas Plant (MGP) (Figure 1). This investigation is to augment information collected under the USEPA-approved Site-Specific Work Plan (SSWP) Revision 2 (NRT, 2015a and NRT, 2015b) and the USEPA-approved VI Technical Memorandum Revision 1 (NRT, 2016b) to support delineation of the nature and extent of MGP impacts at the Site.

The former WPSC Green Bay MGP (Site) is one of six former MGP sites addressed through the Administrative Order on Consent (AOC) and Statement of Work (SOW), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Docket No. V-W-06-C-847, dated May 5, 2006. The Site is currently enrolled in the United States Environmental Protection Agency (USEPA) Superfund Alternative Approach (SAA) program. Under the AOC/SOW, a generic approach to addressing the six sites is to be developed (the Multi-Site approach), describing the procedures and tasks to be followed to complete the Remedial Investigation/Feasibility Study (RI/FS) at the former Green Bay MGP facility, which, in turn, may be modified to account for site-specific differences that may exist at a particular location.

To facilitate project progress, the site has been divided into a sediment operable unit (OU) and an upland OU. The upland OU (OU1) extends from the top slope of the East River riverbank, landward and includes soil, groundwater, and potential vapor. The sediment OU (OU2) extends from the top slope of the East River riverbank, riverward and includes channel sediments, underlying clay, and surface water. The upland OU1 consists of three parcels, the largest of which is owned by WPSC. The former MGP structures were primarily located on the southern part of this parcel (Figure 2). In relation to the upland OU1, the WPSC General Office and Annex Buildings are located northwest, the KI Convention center is located southwest, the Associated Bank Office Building is located south and parking areas owned by Harbinger Development LLC and Associated Bank National Association adjoin the Site to the south and east, respectively (Figure 3). For the purposes of this document, "Site" refers to areas where contamination related to the former MGP has been discovered through investigation activities completed to-date and nearby areas necessary for implementation of the response

~~May 16~~ June 29, 2023

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action inclusive of both the upland OU1 and the sediment OU2. For the purposes of this work plan, the upland OU1 has been further subdivided into two areas as follows:

- “North Parking Lot” refers to the portion of the Site located north of Utility Street/Utility Court. This portion of the site is bounded by the WPSC Annex Building to the west, Utility Court/Utility Street to the south, and the Fox River and East River to the north and east. The North Parking Lot is currently undergoing an Early Removal Action (ERA) as described below.
- “South Parking Lot” refers to the portion of the Site south of Utility Street/Utility Court inclusive of the roadways. The South Parking lot consists of two parcels and the adjacent roadways. The largest parcel is owned by WPSC and used for parking while the smaller parcel is owned by Harbinger Corporation and is used as parking for the Associated Bank Office Building to the south This portion of the Site is bounded by North Jefferson Street to the west, Utility Court/Utility Street to the north, North Madison Street to the East and Elm Street to the south. The former MGP structures were primarily located in this area (Figure 3).

The USEPA-approved SSWP Revision 2 was implemented in October 2015 and February 2016 to characterize the extent of MGP impacts in the subsurface soil and groundwater; and, evaluate vapor intrusion pathways. Supplemental vapor intrusion and indoor air sampling were implemented between August and December 2016 in accordance with the USEPA-approved VI Technical Memorandum Revision 1. An RI data summary package was submitted to USEPA for discussion on February 10, 2017 (NRT, 2017). An Upland Remedial Investigation Data Summary Report (Ramboll, 2020b) was submitted to USEPA in September 2020. USEPA provided comments on December 7, 2020.

In September 2022, an Early Removal Action Work Plan (Ramboll, 2022) was submitted to USEPA to address soil impacts in the North Parking Lot in preparation for potential redevelopment for residential use to expedite the RI/FS process. The ERA construction consists of removal and off-site disposal of soil identified as principal threat waste, removal and off-site disposal of the top four feet of surface soil in the main parking lot, and removal and off-site disposal of the top two feet of surface soil in the Riverwalk area. All areas will be backfilled and clean soil will be imported to address the direct contact pathway. Work began November 2022 and is ongoing with an anticipated completion date of July 2023.

Based on a review of site data collected to date, ~~the ongoing ERA in the North Parking Lot, and a preliminary redevelopment plan for residential use~~, supplemental RI activities are proposed to address remaining data gaps for the site and close out the RI phase of work. Remaining data gaps are further described below and include:

- ~~Uncertainty regarding remaining residential vapor intrusion (VI) risk in the Annex Building following the ERA in the North Parking Lot.~~

~~Uncertainty~~ regarding principal threat waste potentially remaining in place in the South Parking Lot.

## CURRENT DATA GAPS

### ~~VI Risk in the Annex Building following ERA~~

~~When the SSWP Revision 2 and the VI Technical Memorandum were prepared in 2015 and 2016, the Annex Building (located to the west of the North Parking Lot, Figure 2) was used as commercial office space by WPSC. The potential VI risk was evaluated using the Multi-Site VI Decision Matrix (NRT, 2016a), approved by the USEPA on February 10, 2016. In accordance with the Multi-Site VI Decision Matrix, soil borings and~~

soil vapor probes SG 401 and SG 402 were installed east of the Annex Building (Figure 4). Oil-wetted/oil-coated material and detected concentrations of constituents of potential concern (COPCs) were identified in soil borings and the industrial screening level (SL) for benzene was exceeded at SG 401. In 2015 and 2016, it was also identified that the southern portion of the building was in contact with groundwater and/or the capillary fringe and groundwater samples collected at the time from neighboring monitoring wells were below SLs but were present in detectable concentrations; therefore, sampling of indoor air and other lines of evidence were pursued. The northern portion of the building is not underlain by basement and is not in contact with groundwater or the capillary fringe. Based on the analytical results and building observations, a combination of indoor air, sub-slab, and soil-gas sampling was performed to complete evaluation of the VI pathway at the Annex Building.

Nested sub-slab and soil gas probes (SS413/SG413D and SS414/SG414D, Figure 4) were completed within the Annex building in August of 2016. Coincident samples of indoor air, ambient air, sub-slab, and soil gas were collected from the Annex building in August and December of 2016 to evaluate the VI pathway. Soil gas and indoor air sample results from the North Parking Lot are presented on Table 1 and Table 2 and Figure 4. In 2016, prior to the ERA, naphthalene was identified above the Residential SLs at soil-gas/subslab locations SG413/SG413D and SS414/SG414D during the December sampling event and at SS413D during the August sampling event (Table 1). In the southern portion of the building, naphthalene was detected above the residential SL at indoor air location (IA1) in August of 2016 (Table 2). Note that the purpose of indoor air sampling was to compare air quality to site use at the time (industrial), therefore the target reporting limit for multiple compounds including benzene, and naphthalene were higher than the residential SLs (Table 2).

Since the VI sampling was conducted in 2016, site conditions have changed including:

- The ERA was conducted removing principal threat waste to the east of the Annex Building as well as soil in the vicinity of SG401 and SG402.
- The building has been vacated and a potential residential redevelopment opportunity has been identified.

Given the changed conditions, the VI risk associated with residential site use following the ERA is unknown. Further sampling is proposed to address this data gap.

### **Additional Delineation in the South Parking Lot**

In addition to the 2023 ERA, soil remediation was undertaken in 2003 with the objective of removing significant soil impacts and source areas. The selected remedy was source area excavation with medium temperature thermal desorption. Details of the remedial work were summarized in Section 4 of the Completion Report (NRT, 2014).

Excavation and decommissioning of former MGP structures and piping removed approximately 30,075 tons of soil and debris from four areas (Figure 3) that included the following:

- Area 1 (South Parking Lot) - included the 300,000 ft<sup>3</sup> gas holder near Elm Street
- Area 2 (South Parking Lot) - included the former tar well, oil tanks, purifiers, and small gas holders
- Area 3 (North Parking Lot) - included the suspected discharge area of the former concrete channel to the river

- Area 4 (North Parking Lot) – included an area along the East River bank near well MW-410 (elevated cyanide)

In addition, former MGP and sewer piping was also excavated and disposed as shown on Figure 3.

Excavation limits were determined by visual inspection because this was a source area removal effort. The main purpose for excavation was to remove former MGP structures (pipes, channels, tar well, etc.) considered to be sources of the tar impacted material. The extent of the excavation areas is shown on Figure 3. Figures 5a4a through 5e4c show the South Parking Lot and remediated areas in cross-section view. Areas 3 and 4 in the North Parking Lot were re-excavated as part of the 2023 ERA and are not further described below. A summary of the South Parking Lot 2003 remedial excavation (Area 1, Area 2, and the former piping) is provided below.

**Table A. Excavation Volumes and Disposal Summary**

Site Area/Feature	Depth Excavated ft. bgs (approx.)	Tons Excavated	Backfill Material	Final Disposal
<b>Area 1</b>	6-8	3,484	Imported Sand; Treated Soil	Excess soil thermally treated and debris disposed at Hickory Meadows
<b>Area 2 &amp; Tar Well</b>	Tar Well: 16-22, Other: 8-14	14,461	Treated Soil	

**Area 1**

Excavation depths ranged from 6 to 8 feet bgs around the former 300,000 ft<sup>3</sup> gas holder near Elm Street and approximately 3,484 tons of MGP impacted soil was excavated from Area 1 (Figure 3) and thermally treated. Approximately 90 to 95 percent of the concrete base of the gas holder was removed. Due to existing utilities and structures, a small portion of the base was left in place but other MGP conveyance piping, sewers, and impacted soil were excavated.

**Area 2**

The former tar well and subsurface foundations/structures of oil tanks, purifiers, small gas holders, and additional MGP conveyance piping and sewers were excavated from Area 2 (Figure 3). The former 50-foot diameter tar well extended approximately 16 - 20 feet bgs and was filled with tar-impacted soil and debris. An additional gas holder (possibly the remains of a 15,000 ft<sup>3</sup> gas holder) filled with similar material was also encountered. These structures, the material within them, and adjacent soils were excavated and thermally treated or transported for landfill disposal. Former MGP piping or structures and areas of impacted soils were excavated south of the tar well. More than 14,460 tons of MGP impacted soil was excavated from Area 2 and thermally treated. Excavation depths ranged from 16 - 22 feet bgs within the tar well, 10 - 12 feet bgs in the 15,000 ft<sup>3</sup> gas holder area, and 8 - 14 feet bgs in surrounding areas.

**Former Piping**

Former MGP piping, abandoned gas lines, and sewer piping were excavated to depths of 5 to 10 feet bgs. Many former MGP conveyance pipes and sewers were excavated according to plan but others were excavated as encountered during excavation (Figure 3). All MGP related piping, sewers, and structures were excavated as part of the remediation effort as discussed in the Completion Report (NRT, 2014). Where inaccessible or at excavation extents, pipes were abandoned in place and filled with concrete grout to prevent preferential migration of groundwater. Tar-impacted conveyance piping, sewers, and structures

were removed and segregated for disposal at an off-site landfill while the surrounding soils were thermally treated.

Excavations did not proceed laterally or vertically to remove tar or tar staining that observed in clay fractures or silt seams as agreed upon with Wisconsin Department of Natural Resources (WDNR) in the 2003 Remedial Action Work Plan (NRT, 2003). The USEPA noted in the May 29, 2020 comments on the Pre-Design Investigation Work Plan – Revision 0 (Ramboll, 2020a), that:

*The extent of subsurface NAPL in the area of the former MGP structures south of the Utility Court are not known. Based on a review of Table 12 from the 2003 Remedial Action Documentation Report, the side wall and bottom samples from the four excavation areas still have exceedances of screening levels. For example, Sample EW 2-4 (7 ft) has detections of benzene at 8,900 ppb, benzo(a)pyrene at 11,000 ppb, and naphthalene at 95,000 ppb all of which are above screening levels. Additionally, the statement on page 15 of the 2020 PDI WP that excavations did not proceed laterally or vertically to remove tar that occurred in clay fractures or "silt seams", indicates there may be NAPL that extends laterally from the excavation areas in silt seams. The extent of NAPL does not appear to be defined.*

This work plan aims to address the aforementioned comment and define the horizontal and vertical limits of potential principal threat waste beyond the previous removal areas.

Additionally, following the 2003 excavation, three monitoring wells (MW-401AR, MW-402R, and MW-403R, Figure 65) were re-installed within the backfilled areas with screens that partially span the remedial excavation backfill and partially span the clay unit. Existing monitoring wells MW-405A and MW-404 are also sampled on a semi-annual basis to monitor groundwater in the South Parking Lot (Figure 65) and are screened across the fill and clay. Figure 5a4a through Figure 5e4c depict the remedial excavation, lithology and monitoring wells in the South Parking Lot in cross-section view. Since the 2003 remedial action, dense non-aqueous phase liquid (DNAPL) has been periodically detected in wells MW-401AR and MW-405A. Groundwater concentrations in the cross-unit screened wells MW-402R, MW-403R, and MW-404 have shown ongoing benzene and naphthalene groundwater concentrations exceeding Risk Assessment Framework SLs (Table 31). It is unknown whether the source of the contaminant mass contributing to groundwater impacts and the ongoing DNAPL in wells is predominantly related to principal threat waste in clay fractures below the remedial excavation backfill or principal threat waste outside the excavation areas that has re-affected the backfill. -This work plan aims to better define the source of the ongoing groundwater impacts in the South Parking Lot.

Based on these identified data gaps, the primary objectives of this SSWP are to:

~~Determine vapor intrusion risk within Annex Building under residential future use conditions following completion of the ERA in the North Parking Lot.~~

~~Delineate~~ delineate the extent of remaining principal threat waste in the South Parking Lot including:

- Determine the horizontal and vertical limits of principal threat waste beyond the previous removal areas, including in Elm Street and Madison Street.
- Determine if principal threat waste remains within Excavation Area 1 and 2 or if principal threat waste has re-affected the backfill placed during the 2003 remedial action.



- Better define the source of the ongoing groundwater impacts in the South Parking Lot. Determine if the contaminant mass contributing to groundwater impacts is predominantly related to principal threat waste in clay fractures or remaining principal threat waste in the fill unit.

## PROPOSED SUPPLEMENTAL SAMPLING ACTIVITIES

Based on the discussion above, additional investigation will be performed to ~~understand VI risk to residential receptors in the Annex Building following completion of the ERA and to~~ complete delineation of the nature and extent of principal threat waste in the South Parking Lot. The supplemental RI activities described below will be performed in accordance with the site-specific information included in the SSWP Revision 2 and the Multi-Site Field Sampling Plan (FSP) – Revision 4 (IBS, 2008), except where noted.

### Soil Vapor Sampling

~~Sampling will be conducted in accordance with the guidelines presented in the SSWP Revision 2, Multi-Site SOP SAS-11-06 (Rev 1), and the 2016 VI Technical Memorandum Revision 1. Note that the Annex Building heating, ventilation and air conditioning, (HVAC) was supplied by the neighboring Division Office Building which has been demolished. Therefore, the Annex Building does not have an active HVAC system and the building has been vacant without ventilation. Indoor air sampling in the southern portion of the building where shallow groundwater contacts/is near the basement foundation is not proposed because the current conditions are not representative of functional building conditions. Subslab and soil gas sampling will be conducted under existing conditions without operational HVAC. Because there is no operational HVAC, a single round of soil vapor sampling is proposed. If needed, additional sampling could be conducted in the future with an operational HVAC system based on final building redevelopment plans.~~

~~The existing nested sub-slab sampling ports and soil gas probes SS-413/SG-413 and SS-414/SG-414 located in the northern portion of the Annex Building will be evaluated for reuse and re-sampled if the ports pass the chemical leak test described in SOP SAS-11-06 (Rev 1). Sampling will be in accordance with the SSWP Revision 2, the Multi-Site FSP Sub-Slab Sample Port Installation, Sampling and Abandonment SOP SAS-11-01 (Rev 1) and Soil Vapor Probe Installation and Soil Gas Sampling SOP SAS-11-06 (Rev 1). Prior to sample collection, the ports will undergo chemical (helium) leak testing and mechanical leak testing as described in SOP SAS-1106 (Rev 1). A pre-cleaned, evacuated 1-liter (Summa) canister with a laboratory-calibrated flow controller will be used to collect the samples. Subslab and soil gas samples will be submitted to a Wisconsin-certified laboratory (Pace Analytical of Mount Juliet, Tennessee, EurofinsTest America, South Burlington Vermont or STAT Analysis Corporation of Chicago, IL) for analysis of:~~

- ~~• BTEX, naphthalene, and 1,2,4-trimethylbenzene via USEPA Method TO-15.~~
- ~~• Carbon dioxide, oxygen and methane via ASTM Method 1946 or USEPA Method 3C.~~

~~A sampling and analysis plan summary is presented in Table 4. Data will undergo data validation by a third-party data validator.~~

~~Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-03-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02.~~

## Soil Boring and Sampling

~~This section describes the means and methods proposed to delineate the extent of remaining principal threat waste in the South Parking Lot.~~

For the purposes of this investigation, a definition of principal threat waste consistent with the definition used in the North Parking Lot Early Removal Action Work Plan (Ramboll, 2022) will be utilized and will be defined as soil that meets one or more of the following metrics:

- Non-aqueous phase liquid (NAPL) identified as separated liquid.
- Oil-coated or oil-wetted soil.
- Highly adsorbed phase concentrations of constituents of concern (COCs) exceeding a lifetime incremental cancer risk (CR) of  $10^{-3}$  or a hazard index (HI) of 10 under applicable, residential land use assumptions.

## Soil Boring Locations

Soil borings will be installed at the ~~1918~~ primary soil boring locations shown on Figure ~~6-5~~. Contingent soil boring (SB-714) will only be installed if principal threat waste (as defined above) is identified at primary boring SB-717. USEPA will be notified if the contingent boring is needed based on field observations or laboratory analytical results. Seven primary boring locations are located within the 2003 excavation area to vertically delineate the potential presence of principal threat waste in clay fractures and determine if present, whether the principal threat waste has re-affected the backfill placed during the 2003 remedial action. ~~Twelve~~Eleven primary boring locations and the single contingent boring location are located exterior to the previous excavation area to laterally delineate the horizontal limits of principal threat waste beyond the previous removal areas. Soil boring locations were also limited by the presence of utilities throughout the parking lot and streets and shown on Figure ~~6-5~~. Locations may be field modified as needed based on the field-identified locations of utilities.

If principal threat waste is identified at SB-718, additional step-out boring(s) may be needed. However, the utility network is dense at the intersection of Elm Street and N. Madison Street, and WPSC does not own the parcels to the south and east of the roadways. Access agreement(s) will need to be negotiated to install borings on those parcels. WPSC intends to proceed with the initial boring in the roadway. If contingent borings are required, USEPA will be notified, and access agreements will be negotiated at that time. Installation of contingent boring(s) will be performed as part of a second drilling mobilization.

Soil borings will be advanced using a direct-push method. Unless otherwise noted, sampling will be continuous, to define the presence/absence and vertical extent of affected soil at each boring location and extend a minimum of 5-ft into the confining clay layer. For the purpose of guiding investigation fieldwork, the vertical and horizontal extent of principal threat waste will be considered delineated if:

- no oil-coated or oil-wetted observations are present for two consecutive sample intervals (e.g., 4-feet); and
- for the evaluation of risk criteria, a Residential CR is less than  $10^{-3}$  and Residential HI is less than 10 within one sample interval.

All borings advanced as part of the investigation will be continuously logged, following Multi-Site standard SOP SAS-05-02, the presence of fill material, moisture content, photoionization detector readings, the nature of each geologic unit encountered, and visual and olfactory observations indicating the presence of NAPL (e.g., oil-coated, or oil-wetted). Soil boring locations will be recorded per Multi-Site SOP SAS-03-03, and will

be abandoned following the methods described in Multi-Site SOP SAS-05-05. Field equipment will be calibrated prior to use, as required by Multi-Site SOP SAS-02-01 from the Multi-Site FSP.

Subsurface soil samples will be collected from all delineation borings as follows:

- For borings that show no visual, olfactory, or PID indication of impacts, one sample will be collected in the upper four feet to characterize direct contact risks, one sample will be collected within the 2-foot interval above the clay confining layer, and one sample will be collected from the 2-foot interval within the clay confining layer immediately below the fill unit.
- For borings that indicate the presence of contamination (through visual, olfactory, or PID indication), a sample of impacted material will be collected. A second sample will also be collected below the interval(s) of potential MGP impacts, to document vertical extent. Soils will be collected in both fill and clay units as encountered. A third sample will be collected from the upper four feet to characterize direct contact risks.

All soil samples will be submitted to a Wisconsin certified laboratory (Pace Analytical of Green Bay, Wisconsin or EurofinsTest America, Chicago, IL) for COPCs identified in the SSWP Revision 2 including:

- Petroleum volatile organic compounds (PVOCs) via USEPA Method 8260 (Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene)
- Polycyclic aromatic hydrocarbons (PAHs) via USEPA Method 8270 (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)
- Total Metals via USEPA Method 6020A (Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver) and total Mercury via USEPA Method 7471.
- Total cyanide via USEPA Method 9012B

A sampling and analysis plan summary is presented in Table 42. Data will undergo data validation by a third-party data validator.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

## Well Installation and Groundwater Sampling

### Well installation

Following soil boring installation, five pairs of monitoring wells will be installed as shown on Figure 65. At each well pair, one well will be fully screened within the clay unit just below the fill and one well will be fully screened within the fill unit. [The objective of positioning well screens specific to each unit is to understand contaminant mass and potential migration within each of the hydrostratigraphic/lithologic units<sup>1</sup>.](#)

Groundwater samples will be collected from both wells to determine if the contaminant mass contributing to groundwater impacts observed to date in the cross-unit screened wells is predominantly related to principal threat waste in clay fractures or [remaining residual](#) principal threat waste in the fill unit. Two well pairs will

be located to the south and west of the previous remedial area, two well pairs will be located within the previous remedial area, and one well pair will be located adjacent to the former piping removal area.

Wells will be constructed according to Multi-Site SOP SAS-05-03, and ~~th~~~~read~~~~thead~~ed joints will be tightened per manufacturer requirements. A 2-inch inner diameter poly vinyl chloride well with a 0.01-inch factory slotted screen will be installed, and the annular space around the wells will be backfilled with filter pack, bentonite seal, and finished with a steel flush mount cover. The overall depth of the well and the corresponding length of well screen will be determined in the field by the Ramboll field personnel, based on subsurface information collected during soil boring advancement. The following guidelines will be considered when selecting screen placement and length:

- A minimum 3-foot annular seal is preferred; however, a shorter seal length (minimum 2-feet) is acceptable if dictated by field conditions.
- Monitoring well screens will be 5 feet in length. Shorter screens may be considered if dictated by field conditions.
- In each well pair, the bottom of the ~~shallow~~-effective screen interval (i.e., lowermost sand pack) for the shallow well shall be placed ~~at~~approximately 1 foot above the fill-clay interface ~~to limit the potential for cross contamination between the two lithological units.~~ In each well pair, the top of the ~~deep~~-effective screen (i.e., uppermost sand pack) for the deep well shall be placed approximately ~~1-foot~~2 feet below the fill-clay interface.
- Each deep well where oil-wetted/oil-coated clay was observed will be constructed with a sump that is a minimum of 2 feet long to allow for the accumulation of mobile DNAPL if present. The top of the sump (base of the screen) will be placed at the interface of the fissured clay (if present) and competent clay. The annular space around the sump will be sealed with grout or bentonite. A minimum of 6" of filter pack will be placed between the bentonite and well screen to prevent smearing of bentonite near the well screen. Locations without oil-wetted/oil-coated observations will not have a sump installed.
- Sumps will not be installed at the capillary interface between the fill unit and the fissured clay unit in the shallow wells for the following reasons:
  - The expected fill thickness (<8 feet) limits the available space for placing the well with an appropriate annular seal.
  - A two-foot sump would require drilling into the clay unit which may potentially cause cross-contamination/screening between the fill and clay units. The primary goal of the groundwater investigation is to determine if the contaminant mass contributing to groundwater impacts is predominantly related to principal threat waste in clay fractures or residual principal threat waste in the fill unit. The inclusion of sumps with the shallow groundwater wells poses a risk of cross contaminating across hydrostratigraphic units in the shallow wells. However, sumps may be installed on shallow wells if field observations of oil-wetted/oil-coated material above the unit interface indicate that sumps can be installed without causing cross-contamination of the two units.
  - Adjacent to locations SB-712 and SB-706, existing wells (MW-401AR and MW-403R) are currently screened across both hydrostratigraphic units. At these locations, if oil-wetted/oil-coated material is observed near the fill-clay interface, the existing adjacent monitoring well that is screened across both units will be used to monitor DNAPL accumulation. If the adjacent deep clay well with a sump (which is hydraulically isolated from the fill) accumulates DNAPL as well, then it will be inferred that the fractured clay is a source of the DNAPL. These results in combination with the fill well, the cross-unit

[well, and the visual logging of the soil boring will be considered to evaluate the source of groundwater impacts.](#)

## Well Development

Following installation, wells will be developed in accordance with Multi-Site SOP SAS-05-04. Wells will be developed using an electric submersible pump for surging and pumping. Field parameters—specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity—will be measured during development. Wells will be considered developed when field parameters meet the stabilization criteria detailed in Multi-Site SOP SAS-05-04.

## Groundwater Sampling

Each well will be sampled for groundwater COPCs, using low-flow sample techniques, in accordance with Multi-Site SOP SAS-08-02. Groundwater sampling will be conducted within two months following well installation. Field parameters—specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity—will be measured using a flow-through cell. Samples will be submitted to Pace of Green Bay, Wisconsin for groundwater COPCs identified in the SSWP Revision 2 including:

- PVOCs including BTEX, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene via USEPA Method 8260
- PAHs via USEPA Method 8270 (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)
- Total Metals via USEPA Method 6020A (Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver) and total mercury via USEPA Method 7471.
- Nitrate and Nitrite via USEPA method 353.2
- Sulfate via USEPA Method 300

A sampling and analysis plan summary is presented in Table 42. Data will undergo data validation by a third-party data validator.

If the schedule allows, sampling of the newly installed wells will be conducted at the same time as semi-annual sampling of existing wells.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

The need for additional sampling at these wells will be evaluated once the results of the initial round of sampling have been received. [A minimum of four semi-annual groundwater sampling events is anticipated.](#) A recommendation for either abandonment or incorporation into the long-term monitoring network will be provided in the Remedial Investigation Report.

## Observation of DNAPL Accumulation

[Following installation and development of new wells, the thickness of DNAPL in the wells \(if present\) will be measured on a consistent monthly basis for three months, using a weighted cotton string or interface probe. After three months, the gauging frequency will be reduced to semi-annually to coordinate with the planned semi-annual groundwater monitoring events.](#)

## Schedule and Reporting

Soil boring and monitoring well installation is proposed to be completed ~~during the summer in late July~~ 2023 following USEPA-approval of this work plan. ~~Subslab/soil gas sampling is proposed to begin in August 2023 pending completion of the ERA in the North Parking Lot.~~ Results of the investigation will be incorporated into a Remedial Investigation Report, which will be submitted by the end of 2023.

## References

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- Ramboll, 2022. Early Removal Action Work Plan, Former Green Bay Manufactured Gas Plant, Revision 2. September 26.

## Attachments

- Figure 1 – Site Location Map
- Figure 2 – Site Layout Map
- Figure 3 – Soil Remediation Excavation Areas
- ~~Figure 4 – North Parking Lot Future Residential Use Vapor Intrusion Evaluation~~
- ~~Figure 5a4a~~ – Geologic Cross Section D-D’
- ~~Figure 5b4b~~ – Geologic Cross Sections E-E’ and F-F’
- ~~Figure 5c4c~~ – Geologic Cross Section G-G’ and H-H’
- ~~Figure 65~~ – Proposed Soil Borings and Monitoring Wells
- ~~Table 1 – Soil Gas Analytical Results Compared to Residential and Industrial SLs – North Parking Lot~~
- ~~Table 2 – Indoor Air and Ambient Analytical Results Compared to Residential and Industrial SLs – Annex Building~~
- ~~Table 3~~ ~~Table 1~~ – 2018-2022 Groundwater Analytical Results Compared to the Groundwater SL, the PAL, and Tap Water Criteria
- Table 42 – Sampling and Analysis Plan