



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

VIA ELECTRONIC MAIL

September 12, 2023

REPLY TO THE ATTENTION OF:
SR-6J

Mr. Glenn Luke
Principal Engineer - Environmental
WEC Energy Group – Business Services
Environmental Dept. – Land Quality Group
333 W. Everett St., A231
Milwaukee, WI 53203

Re: Review of the Early Removal Action Summary Report – Operable Unit 2 – Revision 0,
Former Green Bay Manufactured Gas Plant Site, Green Bay, Wisconsin

Dear Mr. Luke,

The U.S. Environmental Protection Agency (EPA) has reviewed the document titled *Early Removal Action Summary Report – Operable Unit 2 Utility Court Cove Area* for the Former Green Bay Manufactured Gas Plant Site, dated August 3, 2023. Comments are provided in Attachment 1.

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

Sincerely,

9/12/2023

X Leah Werner

Leah Werner
Remedial Project Manager, EPA Region 5
Signed by: LEAH WERNER

cc: Keld Lauridsen, WDNR
Sarah Krueger, WDNR

SPECIFIC COMMENTS

1. **Section 1.4, Paragraph 2, Page 7/25:** Please include discussion that the results of the forensic evaluation of the sediment samples suggested that some component of the sediment deposit contain MGP residuals.
2. **Section 2.1, Table B, Page 10/25:** Tetra Tech field notes and photographs indicate that OU2 site preparation, specifically construction of the material management pad (MMP), had begun by April 26, 2023. Revise the table to include this date for site preparation.
3. **Section 2.3, Paragraph 2, Page 12/25:** Revise the dates of site preparation activities to include April 26, 2023, when MMP berm construction began.
4. **Section 3.1, Paragraph 2, Page 18/25:** This section states that sheen was observed during the initial removal of soft sediments and debris in the northern portion of the removal area. Since understanding the source of the sheen was a primary goal of the OU2 early removal action, provide additional details regarding the dates on which sheen was observed as well as figures showing these observations during excavation.
5. **Section 3.4, Paragraph 1, Page 20/25:** Add a citation for the early removal action work plan (Revision 2) to explain the “6-inch minimum” required native soil recovery.
6. **Section 3.4, Paragraph 4, Page 20/25:** Define the acronym “PVOCs.”
7. **Section 4.2, Paragraph 3, Page 23/25:** Define the acronym “NTU.”
8. **Section 4.2, Paragraph 5, Page 23/25:** The report states that minimal sheen was observed during remediation, primarily in the northern portion of the Rip-Rap Investigation Extent. Provide more information regarding known or suspected source(s) of sheen and discuss if the sheen was consistent with observations and analytical results of the excavated sediment and rip-rap from this area.

Additionally, the text does not document dates when the sheen was no longer visible, nor does it confirm that sheen is no longer visible at the site. Clarify that the remedial activity reduced or eliminated visible sheen at the site.

9. **Section 5, Paragraph 11, Page 24/25:** Define the acronym “TPAH.”
10. **Section 5, Conclusion, Page 25/25:** Provide an additional statement to clarify that, although understanding the source of the sheen was a primary goal of the OU2 ERA, the source of the sheen was not confirmed. Note the dates when the sheen was visible on water and the dates after which no sheen was visible.
11. **Table 1.** In the table footnotes, define the acronyms “WI” and “CS” as well as the “%” symbol.
12. **Table 2b.** Table 2b is presented before Table 2a. Revise the table names to follow alphabetical order.
13. **Table 2b.** In the table footnotes, define the acronym “AMS.”

**Attachment 1 – Comments on the Green Bay Former MGP Early Removal Action Summary Report –
Operable Unit 2 – Rev 0**

14. **Appendix A1. City of Green Bay Site Plan and Erosion Control Site Plan.** The erosion control permit requires the submission of weekly inspection reports. For completeness, consider attaching the reports to Appendix A1.
15. **Appendix C, Photographic Log, Photograph 21.** The photograph caption states, “Soft sediment commingled with gravel excavated from Sediment Removal Area – directed by poling activities. No visual evidence of impacts was observed.” From the photograph, the excavated sediment appears dark and possibly stained, which can be indication of hydrocarbon contamination. Additionally, sediment in this excavated bucket appears to be significantly darker than the photographs of Inspection Bucket Samples IB-1 through 5 in Appendix G3. Provide additional text and documentation—such as olfactory observations, field screening measurements, and sample results (if available)—to better document that this excavated soil is not oil-wetted or oil-coated material.