



July 8, 2014

File

Mr. James Moser, PECFA Program Specialist, Senior
Wisconsin Department of Natural Resources
101 S Webster Street
Madison WI, 53703
PO Box 7921
Madison WI, 53707-7921

Re: We Energies Pleasant Prairie Power Plant
AST Closure and Soil Sampling Plan

Dear James:

Thank you so much for taking the time to discuss the project at the We Energies Pleasant Prairie Power Plant (P4) regarding the closure/removal of a 500,000 – gallon diesel fuel Above Ground Storage Tank (AST) located on the south side of the facility. The AST is the emergency back-up fuel for the 2 boilers located more than 500 feet north and west of the AST. The closure of this AST is part of a WE capitol project to construct a new 30,000 – gallon diesel fuel AST located on the north side of the property much closer to the boilers.

The construction of the new AST is expected to be complete by the end of 2014 and at that time the 500,000 – gallon AST will be emptied, cleaned, and removed from the site. There is more than 500 feet of piping associated with the AST – 2 lines that take fuel to the two boilers, one return line going back to the boilers, and one abandoned line that has not been removed in the past.

In April, 2014 a series of test pits were dug along the lines to see how the piping was laid in the trenches and what we discovered is that the four lines are alongside each other and that there is no backfill associated with the piping. The exact location of the starting point, the areas where they meet up, and the exact location of the pipe turns was not fully observed due to the many electrical lines that are around the start of the piping runs near the pump house.

Based on the limited information, the presence of several other utility lines, the unknown exact location of the pipe line beginning, we are presenting the following plan to abandon some of the lines in place and remove other portions of the lines.

Figure 1 shows the location of the lines, the AST, the pump house, and the boiler building. This Figure also shows the areas we are proposing to abandon in place and which areas we plan to remove.

Figures 2, 3, and 4 show the utilities in the area along with other features. I have labeled them based on Area A, Area B, and Area C.

Our piping closure plan and sampling plan are outlined below:

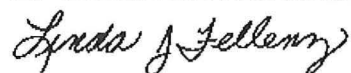
- Area A
 - Remove all piping between the AST and the upload area dispensers located at the east side of the AST;
 - Remove all piping between the AST and pump house building;
 - Collect samples every 20 feet along lines from AST to building during removal;
 - Collect samples every 20 feet from AST to the junction between the lines heading north / south and the lines heading east / west;
- Area B long runs going east / west:
 - Abandon these lines in place;
 - Collect samples every 50 feet along the long runs unless obvious signs of a release during line abandonment are observed;
 - Collect additional samples at 90 degree turn on west end of the lines;
- Area C north – south piping runs toward boiler building:
 - The single piping run on the east side of the garage building will be removed;
 - Collect samples every 20 feet along the east pipe run;
 - Collects samples at the area where all 4 pipe meet;
 - Piping that runs to the boiler building from the junction site will be removed;
 - Collect samples every 20 feet along the area where the 4 line head into boiler building;
 - The 3 piping lines that run under the building will be abandoned in place;
 - Collect one sample between the junction on the south side of the roadway, one on the north side of the roadway and one outside of the building;

will collect samples on either side of N-S entrance road and then every 20ft along area B

Please let me know if you would like to discuss further or if you would like to visit the site prior to any pipe line abandonment. If you have any questions or comments, please feel free to call me at (414) 254-4813 or email me at LFellenz@LFGreendevlopment.com.

Sincerely,

LF GREEN DEVELOPMENT, LLC



Linda J. Fellenz
President



FIGURE 1



BOILER BUILDING

Lines to be Removed

Area C

Area B

Lines to be Abandoned In Place

Area A

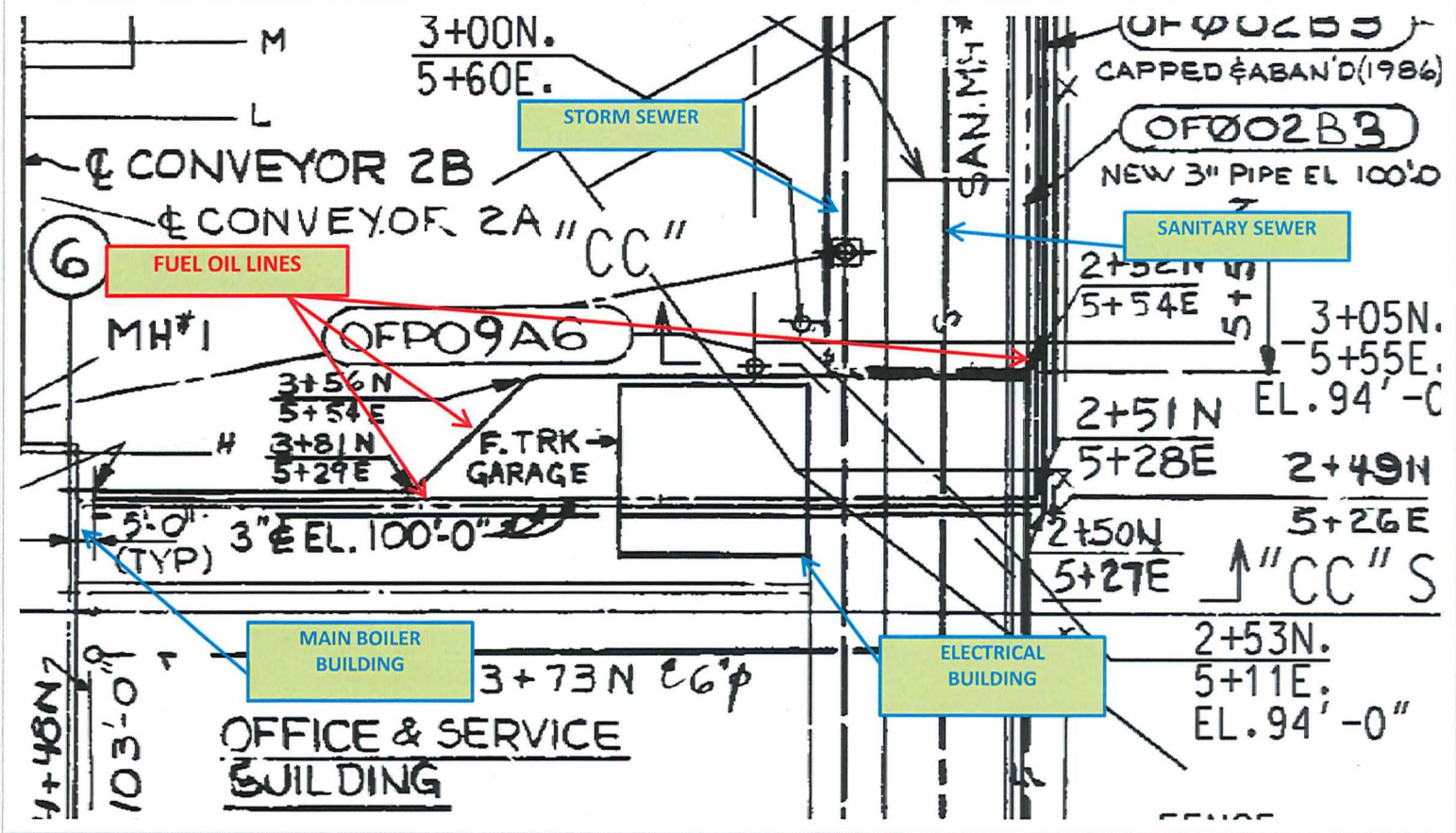
All Piping removed in Area A

MAIN ROADWAY INTO THE PLANT

w46052	2014-05-28 16:22:31
Area C	
w46052	2014-05-28 16:20:39
Area B	
w46052	2014-05-28 16:19:20
Area A	

100 feet 25 m

FIGURE 3: This is area C showing the lines and utilities from the roadway up to the boiler building.





Ms Fellenz, This is the confirmation notice that I promised to send. In our July 18th, Friday afternoon conversation I agreed with your sampling proposal with the exception of Area B. You explained your concerns, the biggest of which was disruption of traffic along the main road into the plant. Because samples really need to be collected every 20 ft to hopefully capture piping connection joints we agreed to the sampling scheme presented above in Figure 1.



500,000 GALLON AST

8000 95th St
Pleasant Prairie, WI 53158

8000 95th St, Pleasant Prairie, WI
8000 95th St, Pleasant Prairie, WI 53158
Explore this area



88th Ave

95th St

95th St

95th St

Green Bay Rd

95th St

Imagery ©2014 & Google, Map data ©2014 & Google - Terms - Privacy - Report a problem - 2014



Tank Detail

Site and Owner

Site Info	County & Municipality	Owner
Facility ID: 154768 W E ENERGIES (P4) 30 - KENOSHA	Village of PLEASANT PRAIRIE	ID: 382951
8000 95TH ST	Fire Dept ID: 3004 - Pleasant Prairie	WE ENERGIES - RICHARD STERNKOPF
PLEASANT PRAIRIE		333 W EVERETT ST
Landowner Type: Private		MILWAUKEE WI 53201
Site Anniversary Date:	Dispensers have Sumps: Yes	

Aboveground Storage Tank - ID: 205659, Wang ID: 300400001, In Use

Install Date:	Capacity in Gallons:	500000	Contents:	Diesel	
Tank Occupancy:	Utility	Marketer:	N	CAS Number:	
Federally Regulated:		Spill Protection:	Required - Installed	Overfill Protection:	Required - Installed
Overfill Prot Type:	Site Gauge	Containment Sump Installed:	Unknown		
Corrosion Protect Type:	Not Applicable	Date of Lining:		Lining Inspected Date:	
Leak Detection:	Visual Monitoring	Cath Test Date:		Cath Expire Date:	
Leak Test Meth:		Leak Expire Date:		Leak Test Date:	
Construction Material:	Lined Steel	Wall Size:	Single	Underground Piping:	Y
Close Order Date:		Close Order By:			

Piping - In Use

Flex Connectors:	UST mainfolded:	N	Related Tank ID:
Type:	Aboveground Piping:		Aboveground Pipe Construction:
Construction Material:	Bare Steel	Corrosion Protect Type:	Not Applicable
Cath Test Date:		Cath Expire Date:	
Leak Test Date:	10/13/2012	Leak Expire Date:	10/13/2013
Catastrophic Leak Detection:		Cat Leak Test Date:	
Leak Detection:		Leak Test Meth:	Tightness Test
Pipe Wall Size:		Piping System Type:	Gravity/AST Head Pressure

Inspections [Click here for login page](#)

Trans ID	Type	Status	Date	Fiscal Yr
907783	LP	CLOS	01/13/2004	2004
1040840	LP	CLOS	06/03/2005	2005
1175826	LP	CLOS	06/21/2006	2006
2116696	LP	CLOS	07/03/2013	2013
2283874	LP			2014
1299188	LP	CLOS	06/20/2008	2007
1448825	LP	CLOS	08/07/2008	2008
1561161	LP	CLOS	06/24/2009	2009
1715635	LP	CLOS	06/16/2010	2010
1819035	LP	CLOS	03/16/2011	2011
1964385	LP	CLOS	05/30/2012	2012

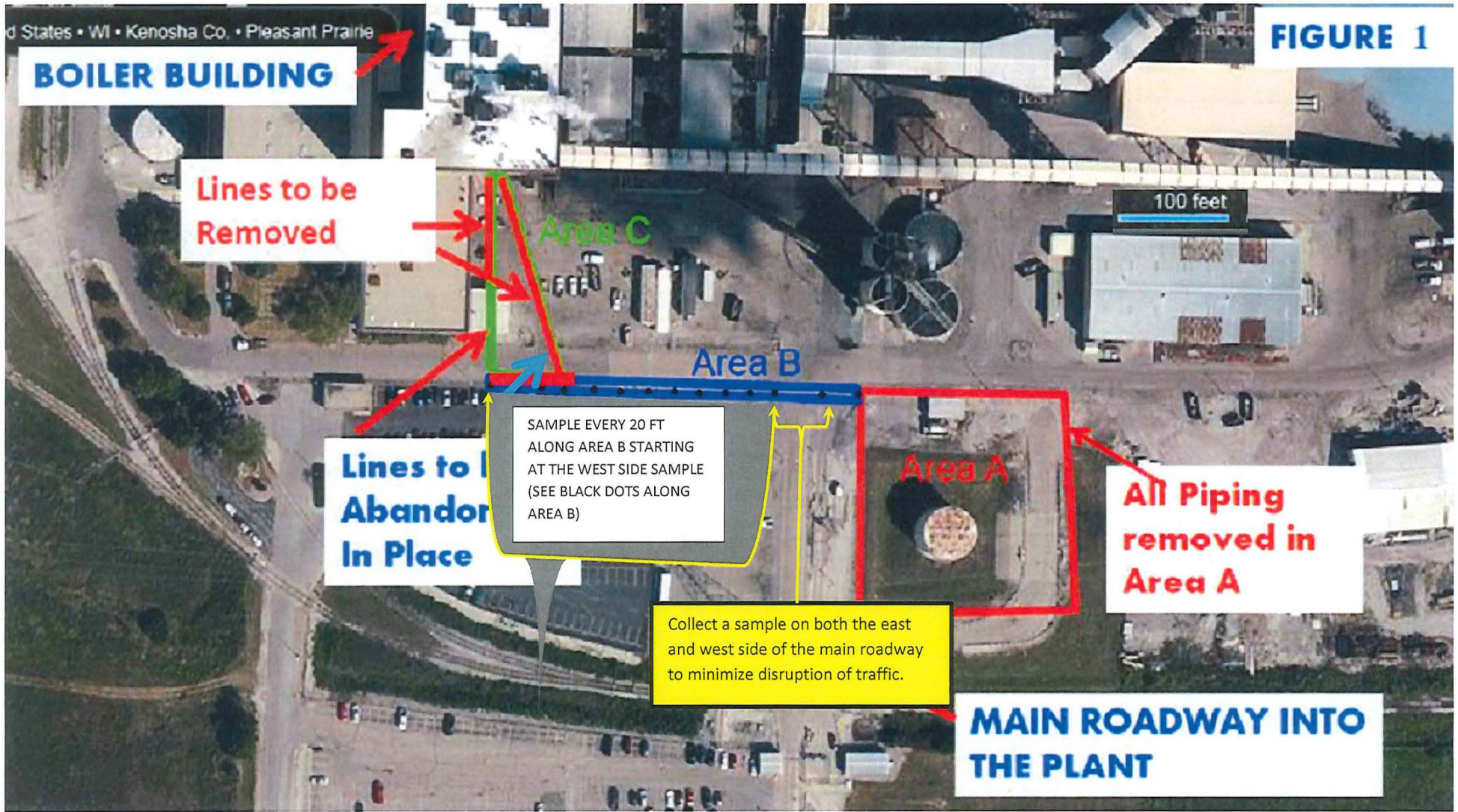


FIGURE 1

Ms Fellenz, This is the confirmation notice that I promised to send. In our July 18th, Friday afternoon conversation I agreed with your sampling proposal with the exception of Area B. You explained your concerns, the biggest of which was disruption of traffic along the main road into the plant. Because samples really need to be collected every 20 ft to hopefully capture piping connection joints we agreed to the sampling scheme presented above in Figure 1.