



We Energies  
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June 18, 2019

Ms. Jennifer Dorman  
Environmental Program Associate  
R & R Program  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King Dr.  
Milwaukee, WI 53212-3128

**SUBJECT:       Response to Comments - Site Investigation Workplan  
                  We Energies Metro North Service Center  
                  3100 W. North Ave., Milwaukee, WI  
                  BRRTS Activity #: 02-41-583015**

Dear Ms. Dorman:

Please find attached the Response to comments on the Site Investigation Workplan for the above referenced site received on May 5, 2019. Please note that an electronic copy of this document has also been forwarded to you and Mr. Adam McIlheran.

Please feel free to contact me at your convenience at (414) 221-2156 or via email at [frank.dombrowski@wecenergygroup.com](mailto:frank.dombrowski@wecenergygroup.com) if there are any questions or if additional information may be needed.

Sincerely,

A handwritten signature in black ink that reads "Frank Dombrowski".

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

Attachment

Cc: Project File  
Adam McIlheran, WDNR  
Jeremiah Johnson, Geosyntec Consultants  
David Jaeckels, We Energies

June 18, 2019

Ms. Jennifer Dorman  
Environmental Program Associate  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
2300 N. Dr. Martin Luther King Jr. Drive  
Milwaukee, WI 53212-3128

**Subject:       RESPONSE TO WDNR COMMENTS**  
**Site Investigation Work Plan**  
Metro North Service Center  
3100 West North Avenue  
Milwaukee, Wisconsin  
WDNR BRRTS # 02-41-583015  
WDNR FID # 241311510

Dear Ms. Dorman,

On behalf of Wisconsin Electric Power Company (d.b.a., We Energies), this letter documents our responses to the Wisconsin Department of Natural Resources' (WDNR's) May 15, 2019 letter comments to the March 12, 2019 Site Investigation (SI) Work Plan ("Work Plan") for the Metro North Service Center (MNSC) site located at 3100 West North Avenue, Milwaukee, Wisconsin ("Site").

In general, it is the opinion of We Energies and Geosyntec that the Work Plan as prepared satisfies the requirements of NR 716.09 and that the additional information requested by WDNR, while relevant, is material that would be most appropriate for submittal as part of the SI Report following collection and analysis of data collected as part of the SI, consistent with NR 716.15. As noted below, most of the requested information could not be completely or accurately prepared in the absence of more comprehensive SI data.

For reference, attached **Table 1** provides a summary identifying the NR 716.09 content requirements and the corresponding Work Plan sections and figures that specifically address these requirements.

Our responses to specific comments are provided below, inclusive of WDNR's May 15, 2019 letter comment number.

**Response to WDNR Comment 1.** Work Plan Section 2.4 documents that the December 2018 soil borings “were advanced adjacent to the southwest portion of the building to further assess the potential for impacts based on the October 2018 geotechnical boring B-7 and July 2018 soil boring location GP-02 information and historical Sanborn® map information.” The WDNR comment/additional request for “*data and rationale for the scope of the assessment is needed to be able to assess whether the Work Plan will adequately determine the degree and extent of impacts to all media*” is unclear. The evaluation of the SI data, including the degree and extent of impacts and associated applicable exposure and migration pathways (i.e., a conceptual site model), will be documented in the SI Report consistent with NR 716.15 and could not be accurately prepared in the absence of more comprehensive SI data. If initial SI results suggest that the degree or extent of impacts has not been sufficiently established, additional data collection will be undertaken based on those initial results.

**Response to WDNR Comment 1a.** The July and October 2018 soil boring data, collected for potential building expansion and construction purposes, were used as preliminary information only. The available July and October soil boring information will be provided in the SI Report, if such information will be useful in documenting the nature and extent of tetrachloroethene (PCE) impacts at the Site. This information would include the July 2018 soil boring logs, inclusive of the photo-ionization (PID) information, and abandonment forms and the October 2018 soil boring PID information. October 2018 geotechnical drilling contractor boring logs would be provided if available. However, as typical, abandonment forms were likely not completed by the geotechnical drilling contractor.

**Response to WDNR Comment 1b.** The purpose of the Work Plan is to specifically address the January 17, 2019 release notification associated with historical dry cleaner PCE impacts. Based on our current knowledge, no other releases of hazardous substances have been documented at the Site. The Work Plan is not intended to address all historical features depicted on Sanborn maps.

**Response to WDNR Comment 2.** The requested “*evaluation and discussion of the possible mechanisms for the distribution of observed impacts*” and the “*identification of data gaps*” is information that will be documented in the SI Report consistent with NR 716.15. Data gap analysis will be an ongoing process during the SI activities and expansion of the scope of the field investigation will be considered as conditions and observations may warrant.

**Response to WDNR Comment 2a.** The requested data mapping (“*one or more figures that include the extent of known soil and groundwater impacts*”) and associated data evaluation will be documented in the SI Report consistent with NR 716.15.



**Response to WDNR Comment 2b.** Cross-section development and associated data evaluation will be documented in the SI Report consistent with NR 716.15. As documented in Section 3.3.1, a utility assessment is included in the scope of the SI (i.e., the depth of utilities are not currently known).

**Response to WDNR Comment 2c.** The requested specific “*explanation*” is beyond the requirements of NR 716.09. A soil boring/monitoring well is proposed on the approximate property line proximate to previous soil borings GP-2 and GP-3. If data gaps are identified for this area, additional on-site and/or off-site investigation will be undertaken as necessary to assess the nature and extent of PCE impacts at the Site (based on field observation and the collected soil and groundwater data and the utility assessment findings).

**Response to WDNR Comment 2d.** Consideration will be given to the sequencing of piezometer installation (e.g., following groundwater monitoring well installation and data evaluation). Data gap analysis (such as the additional monitoring well installation noted in this comment) will be ongoing during the SI process and additional on-site and/or off-site investigation may be undertaken as necessary to assess the nature and extent of PCE impacts at the Site (based on field observations and the collected soil and groundwater data and the utility assessment findings).

**Response to WDNR Comment 2e.** Soil sample collection will address potential direct contact and groundwater protection pathways. If groundwater flow quantification is needed to address data gaps, in-well hydraulic conductivity or other testing will be considered. Data gap evaluation, and any necessary supplemental data collection and analysis activities will be documented in the SI Report.

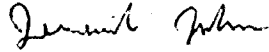
**Response to WDNR Comment 3.** At this time, the vapor pathway for the existing building will continue to be directly assessed by indoor air sampling. Indirect sub-slab vapor assessment may be considered in the future pending results of soil sampling in shallow borings, results from groundwater sampling of the surficial water bearing unit and the long-term disposition and/or operation of the building.

We Energies does not plan to resubmit the Work Plan. WDNR’s review comments will be addressed and included in the SI Report. It is anticipated that the SI field work will commence in July 2019. Schedule updates will be provided to the WDNR in the NR 700 semi-annual progress reports.

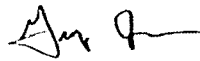
Ms. Jennifer Dorman  
Wisconsin Department of Natural Resources  
June 18, 2019  
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Please contact us if you have any questions.

Sincerely,



Jeremiah Johnson, P.G.  
Project Geologist  
(licensed P.G. in WI)



Greg Johnson, P.H., P.G., P.E.  
Senior Engineer  
(licensed P.E. in WI, P.H. in WI, P.G. in IL, WI)

Attachment: Table 1 - Site Investigation Work Plan Contents Summary

**TABLE 1  
SITE INVESTIGATION WORK PLAN CONTENTS SUMMARY**

Metro North Service Center (MNSC)  
3100 West North Avenue  
Milwaukee, Wisconsin

<b>NR 716.09 Site Investigation Work Plan Requirements</b>	<b>March 12, 2019 Site Investigation Work Plan</b>
NR 716.09(2) Contents. The work plan shall include all of the following information, unless otherwise directed by the department:	
NR 716.09(2)(a). Site name, address, and location by quarter-quarter section, township, range and county, and the location information specified in s. NR 716.15 (5) (d).	Section 2.1, Figure 1 (Site Location Map)
NR 716.09 Note: Paragraph NR 716.15 (5) (d) requires submittal of Wisconsin Transverse Mercator (WTM) coordinates.	Section 2.1
NR 716.09(2)(b). Name and address of the responsible party or parties, and name and address of all consultants or contractors involved in the response action.	Cover letter, Cover pages, Section 1
NR 716.09(2)(c). Site location map, consisting of the applicable portion of a 1:24,000-scale topographic quadrangle published by the United States geological survey with the name of the quadrangle indicated, and a site layout map to approximate scale depicting the layout of buildings, roads, discharge location and other relevant features of the site.	Figure 1 (Site Location Map), Figure 2 (Site Vicinity Map), Figure 3 (Site Layout Map)
NR 716.09(2)(d). Information gathered during scoping of the project, including the applicable items in s. NR 716.07.	Sections 2.2, 2.3 and 2.4
NR 716.09(2)(e). Basic information on the physiographical and geological setting of the site necessary to choose sampling methods and locations, including:	Section 2.5
NR 716.09(2)(e)1. The existing topography, including prominent topographic features.	Section 2.5.1
NR 716.09(2)(e)2. The surface water drainage patterns and significant hydrologic features, such as surface waters, springs, surface water drainage basins, divides, wetlands and whether the site lies within a floodplain or floodway.	Section 2.5.1
NR 716.09(2)(e)3. Texture and classification of surficial soils.	Section 2.5.2
NR 716.09(2)(e)4. General nature and distribution of geologic materials, including the thickness and type of unconsolidated materials and the type and nature of bedrock.	Section 2.5.2
NR 716.09(2)(e)5. General hydrogeologic information.	Section 2.5.2
NR 716.09(2)(e)6. Potential hazardous substance migration pathways.	Section 2.5.2 (groundwater flow), Figure 3 (existing utility and building information), Section 3.3.1 (planned utility assessment)
NR 716.09(2)(f). Sampling and analysis strategy to be used during the field investigation, including:	Section 3
NR 716.09(2)(f)1. A description of the investigative techniques to be used to characterize the site or facility.	Section 3
NR 716.09(2)(f)2. Identification on a site layout map of the locations, both planimetric and vertical, from which samples of environmental media will be obtained. Where locations cannot be specified in advance, the work plan shall include a description of the strategy to be used for determining these locations in the field.	Figure 4 (Site Investigation Map)
NR 716.09(2)(f)3. A description of sampling methods to be used, including methods for collecting, preserving and delivering samples, and leak detection methods.	Section 3
NR 716.09(2)(f)4. An itemization of the parameters for which samples will be analyzed, as well as the analytical methods to be used and their method detection limits.	Section 3.3.5
NR 716.09(2)(f)5. A description of quality control and quality assurance procedures to be used per sampling method, including the items specified in s. NR 716.13.	Sections 3.3.8 and 4.3.3
NR 716.09(2)(f)6. A description of the procedures to be used to prevent cross-contamination among samples.	Sections 3.3.8 and 4.3.3
NR 716.09(2)(f)7. A description of the type of investigative wastes that will be generated during the site investigation and how they will be collected, stored, transported and treated or disposed of.	Sections 3.3.7
NR 716.09(2)(f)8. A discussion of how the sampling and analysis results will be related to results of any previous investigations at the site or facility, and how the results will be used to determine the degree and extent of the contamination and the selection of a remedial action option including, where appropriate, natural attenuation.	Section 3.3.9 and 4.3.4
NR 716.09(2)(g). A description of other procedures to be used for site management, including erosion control and repair of structural, soil, or ground disturbance.	N/A - Erosion control measures not required under the scope of the workplan.
NR 716.09(2)(h). A schedule for conducting the field investigation and reporting the results to the department.	Section 5