

**From:** Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>  
**Sent:** Wednesday, June 24, 2020 11:00 AM  
**To:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
(gielniewski.margaret@epa.gov)  
**Cc:** Krueger, Sarah E - DNR; Fitzpatrick, William - DNR;  
adrienne.korpela@jacobs.com; Marcus Byker (Marcus.Byker@ramboll.com);  
Abigail Small (ASMALL@ramboll.com); Bougie, Cheryl - DNR; Prasad,  
Narendra M  
**Subject:** Former WPSC Marinette, WI MGP - Proposed Supplemental PDI Sampling  
Plan for Fincantieri Marinette Marine Property  
**Attachments:** 2020-03-13 Marinette PDIWP Addendum 1.pdf

Margaret,

As noted in my email of 6/17/20 and as we discussed by phone earlier this week, please find attached a proposed approach for a supplemental PDI sampling effort on the Fincantieri Marinette Marine (FMM) property adjacent to the Boon Landing area at the former WPSC Marinette, WI MGP site. As we discussed, it may be helpful to schedule a conference call to discuss the plan and address any questions or concerns you may have. Once we have EPA's concurrence regarding the scope and specifics of this effort, we will initiate the process of approaching FMM to discuss access. Please feel free to contact me if there are any questions in the meantime.

Thanks,

*Frank Dombrowski*  
*Principal Environmental Consultant*

WEC Energy Group - Business Services  
Environmental Dept. - Land Quality Group  
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*Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities,  
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June 24, 2020

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

**RE: Preliminary Design Investigation (PDI) Work Plan – Addendum  
Marinette Former Manufactured Gas Plant Site, Marinette, Wisconsin  
Wisconsin Public Service Corporation  
CERCLA Docket No. V-W-06-C-847; Site Spill ID – B5BT; CERCLIS ID – WIN000509952**

Dear Ms. Gielniewski,

This letter serves as Addendum 1 to the Preliminary Design Investigation Work Plan (PDI Work Plan) – Revision 2, dated March 13, 2020, for the WPSC Marinette Former Manufactured Gas Plant (MGP) (the Site).

Between April 20, 2020 and May 14, 2020, preliminary design investigation (PDI) activities, including the advancement of soil borings, were conducted at the Site in accordance with the United States Environmental Protection Agency (USEPA)-approved PDI Work Plan, Revision 2. Based on the preliminary results of these PDI activities, in a May 1, 2020 email, USEPA indicated additional investigation is warranted on the Fincantieri Marinette Marine (FMM) property to complete delineation of source material.

Four additional soil borings are proposed to complete delineation of source material in the equipment storage yard at FMM. The proposed locations of these soil borings are shown on Figure 1 and sampling rationale is outlined in Table 1. Soil borings will be completed and sampled consistent with Section 4.3.1 of the PDI Work Plan, Revision 2. Additional contingent step-out borings will be advanced in the event that a definition of extent of source material impacts in this area is not achieved after the installation of the initial delineation borings. The potential locations of contingent delineation step-out borings are also shown on Figure 1; however, these locations may be modified to reflect actual delineation data gaps and possible above- or below-ground physical obstructions present on the FMM property. The precise number and locations of the delineation borings will also be confirmed in the course of WPSC negotiating and executing an access agreement with FMM.

As noted, the work will be conducted in accordance with the procedures outlined in the PDI Work Plan, Revision 2. Prior to advancing the soil borings, a public and private utility locate will be performed. Sonic borings will be advanced at the locations shown on Figure 1. Once the borings are completed, a topographic, boundary, and utility survey will be conducted on this portion of the FMM property including: property boundaries, structures and driveway entrances, easements, above-ground and underground utilities as identified during the utility locate process, existing site features such as fences, fence gates, asphalt/concrete surfaces, the final location of the soil borings, and a site topographic survey with 1-foot contours.

Pending USEPA approval and the successful development and execution of an access agreement between WPSC and FMM, utility locating, contractor availability and weather conditions, the proposed supplemental PDI activities will be initiated. WPSC will regularly inform USEPA status of property access negotiation as part of routine Monthly Progress Reports. As noted, negotiation of property access may result in modification to the quantity, location, and sampling approach outlined in this Addendum. WPSC will inform USEPA as any potential modifications are identified.

June 24, 2020

The results of the additional assessment will be discussed with USEPA prior to their inclusion in the PDI Report along with other data collected during prior PDI activities.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Dombrowski". The signature is fluid and cursive, written over a light blue horizontal line.

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

cc: Ms. Sarah Krueger, WDNR (via US Mail and email)  
Mr. William Fitzpatrick, WDNR (via US Mail and email)  
Ms. Cheryl Bougie, WDNR (via email)  
WDNR Northeast Region (via email to [DNRRRNER@wisconsin.gov](mailto:DNRRRNER@wisconsin.gov))  
Ms. Adrienne Korpela, Jacobs (via email)  
Mr. Marcus Byker, Ramboll (via email)

Enclosures: Table 1 – Additional Pre-Design Investigation Boring Summary  
Figure 1 – Marinette Marine Proposed Delineation Borings

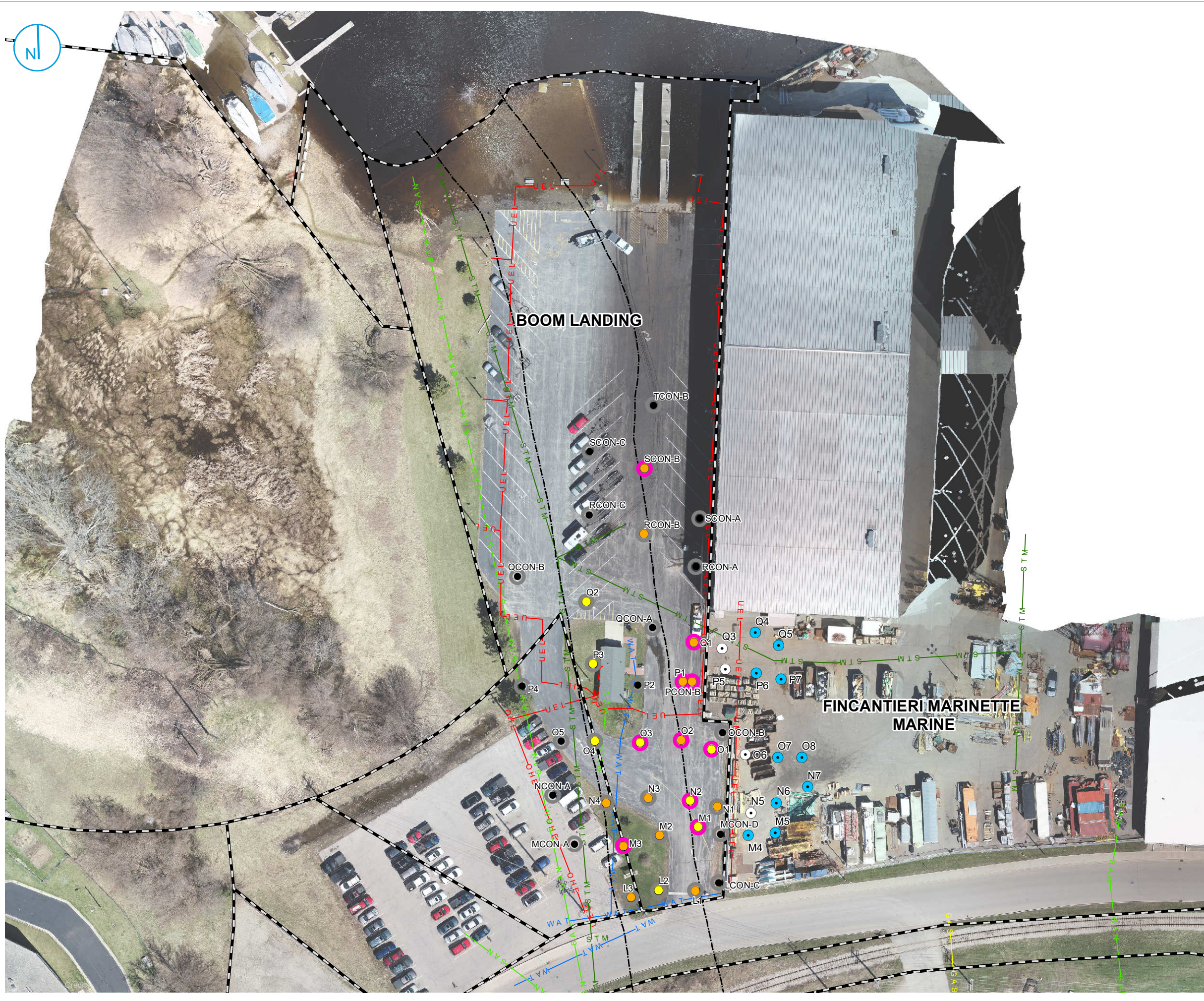
**TABLE 1 - ADDITIONAL PRE-DESIGN INVESTIGATION BORING SUMMARY AND RATIONALE**  
**WISCONSIN PUBLIC SERVICE CORPORATION- FORMER MARINETTE MANUFACTURED GAS PLANT SITE**  
**1603 ELY STREET, MARINETTE, WISCONSIN**  
**BRRTS# : #02-38-000047**  
**USEPA# : WIN00050995**

Proposed Boring Name	Rationale	Target Delineation Sampling Depth <sup>1,2</sup>	Sample Parameters
<b>Initial Delineation Borings</b>			
N5	Delineate source material observed at Boring N1	<p>If source material is observed in the boring, the following samples will be collected:</p> <ul style="list-style-type: none"> <li>-interval of observed source material</li> <li>-first non-visually impacted interval below source material</li> <li>-two-foot interval at bottom of boring above bedrock</li> </ul> <p>If source material is not observed in the boring, the following samples will be collected:</p> <ul style="list-style-type: none"> <li>-interval of impacts observed in adjacent boring</li> <li>-two-foot interval at bottom of boring above bedrock</li> </ul>	<p>Ethylbenzene, naphthalene, benzo(a)pyrene, benz[a]anthracene, benzo[b]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, indeno[1,2,3-cd]pyrene</p>
O6	Delineate source material observed at Boring O1		
P5	Delineate source material observed at Boring PCON-B		
Q3	Delineate source material observed at Boring Q1		
<b>Contingent Borings</b>			
M4	To be installed if source material observed at boring N5	<p>If source material is observed in the boring, the following samples will be collected:</p> <ul style="list-style-type: none"> <li>-interval of observed source material</li> <li>-first non-visually impacted interval below source material</li> <li>-two-foot interval at bottom of boring above bedrock</li> </ul> <p>If source material is not observed in the boring, the following samples will be collected:</p> <ul style="list-style-type: none"> <li>-interval of impacts observed in adjacent boring</li> <li>-two-foot interval at bottom of boring above bedrock</li> </ul>	<p>Ethylbenzene, naphthalene, benzo(a)pyrene, benz[a]anthracene, benzo[b]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, indeno[1,2,3-cd]pyrene</p>
M5	To be installed if source material observed at boring M4 or N6		
N6	To be installed if source material observed at boring N5		
N7	To be installed if source material observed at boring N6		
O7	To be installed if source material observed at boring O6		
O8	To be installed if source material observed at boring O7		
P6	To be installed if source material observed at boring P5		
P7	To be installed if source material observed at boring P6		
Q4	To be installed if source material observed at Q3		
Q5	To be installed if source material observed at Q4		

**Notes:**

1. Borings to be advanced to the top of bedrock anticipated between 15.5 and 16.5 feet bgs.
  2. Quality Assurance/quality control samples will be conducted as outlined in the Preliminary Design Investigation Workplan, Revision 2.
- bgs - below ground surface





**MOST NOTABLE VISUAL OBSERVATION OF NAPL IMPACTS**

- NAPL IMPACTED (OIL-WETTED)
- NAPL IMPACTED (OIL-COATED)
- NO OBSERVATION OF NAPL
- HI>10 OR CR>1E-3
- HI<10 AND CR<1E-3
- PROPOSED SOIL BORING - INITIAL
- PROPOSED SOIL BORING - CONTINGENT DELINEATION STEP-OUT
- FORMER SLOUGH/ LOG RUN
- GAS
- OHE OVERHEAD ELECTRIC
- SAN SANITARY SEWER
- STM STORM SEWER
- UEL UNDERGROUND ELECTRIC
- WAT WATER
- PARCEL BOUNDARY (MARINETTE COUNTY, ACCESSED 7/16/2018)

**NOTES:**  
 CR - CANCER RISK  
 HI - HAZARD INDEX  
 MGP - MANUFACTURED GAS PLANT  
 NAPL - NON-AQUEOUS PHASE LIQUID



**MARINETTE MARINE PROPOSED DELINEATION BORINGS**

PRELIMINARY DESIGN INVESTIGATION  
 WORK PLAN ADDENDUM  
 WPSC MARINETTE FORMER MGP SITE  
 MARINETTE, WISCONSIN

**FIGURE 01**

