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Public Safety
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Wisconsin Public Service Corporation

700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

November 12, 2019

Deputy Chief Gregg Kadow
Division of Life Safety
City Hall
900 Quay Street
Manitowoc, WI, 54420

RE: Former Wisconsin Fuel and Light Building - 402 North 10th Street

Dear Deputy Chief Kadow:

Wisconsin Public Service Corporation (WPSC) is beginning the design phase of the upland portion of the former Manitowoc Manufactured Gas Plant (MGP) Superfund Alternative Site remediation. In preparation for the remediation, WPSC desires to raze a significant portion of the former Wisconsin Fuel and Light (WF&L) structure located at 402 North 10th Street, Manitowoc, WI before the end of 2019.

As provided in Manitowoc Municipal Code 16.070(1)(b), Common Council approval is required to raze buildings that exceed a total of 100,000 cubic feet. The portion of the WF&L building that WPSC intends to raze includes all but approximately the western forty (40) feet of the building where a groundwater extraction and treatment system is housed that needs to remain operational until the cleanup is conducted. Conservatively, between the main floor and lower level (basement) the portion of the WFL building to be razed exceeds the 100,000 cubic foot threshold.

WPSC is presently abating asbestos containing materials in the entire building and when completed would proceed with razing the building. WPSC is in the process of obtaining bids for the demolition work and is hopeful, with Common Council approval, to start demolition in early December 2019 and be substantially complete before the end of 2019. As considerable remediation of an adjacent property and portion of Chicago Street will be completed in the near future, at this time WPSC intends to remove the entire WFL building except for the following:

- the western 40 feet of the structure housing the groundwater treatment system
- the south and east basement walls that act as temporary retaining walls until the site is restored following full scale cleanup activities
- basement floor slabs that provide the required direct contact surface barrier

Leaving the south and east basement walls intact until the full scale cleanup creates a safety concern related to the vertical drop off that will be present. Although specific measures to

address this concern have not been finalized, as part of the demolition effort, a semi-permanent safety barrier that is acceptable to the City, will be constructed. WPSC will maintain this barrier until this safety concern is addressed as part of the final restoration of the property.

WPSC requests that the City waive the requirement of an Irrevocable Letter of Credit and Comprehensive Liability Insurance. The Irrevocable Letter of Credit is unnecessary as the United States Environmental Protection Agency (USEPA) has issued a Record of Decision under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) that requires WPSC to conduct a specific cleanup of the upland portion of the site necessitating the removal of the WFL building. As for waiving the Comprehensive Liability Insurance, WPSC is self-insured. If helpful, WPSC can provide documentation which illustrates it has the financial wherewithal to perform this work via the Company's net worth as shown in its annual 10K report as a means to demonstrate its ability complete this work.

Should you have any questions regarding this issue, please contact me directly at (44) 221-3948 or robert.paulson@wecenergygroup.com

Sincerely,

A handwritten signature in black ink that reads "Robert Paulson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Robert Paulson
WEC Business Services
on behalf of Wisconsin Public Service Corporation

cc: Brian Bartoszek - WPSC