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State of Wisconsin DEPARTMENT OF NATURAL RESOURCES Northern Region Headquarters 810 W. Maple Street Spooner WI 54801

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May 31, 2011

Mr. Bill Bombich Superior Water Light & Power 2915 Hill Ave. PO Box 519 Superior WI 54880

Subject: Proposed Remedial Action Plan

Dear Mr. Bombich:

I have reviewed the historic soils and groundwater data collected from the former SWL&P manufactured gas plant site in Superior Wisconsin. At our meeting in Superior on May 18th, your consultant proposed some remedial effort that SWL&P may take to move the site towards closure. At that time mainly capping with long term monitoring was discussed. Also at that time I agreed to review the historic data and reply to the proposed approach.

The soil contaminant concentration detected in soils borings and test pits in the areas of MW-3, B-3 and T6, T8 and MW-4 indicate highly contaminated soils which, if left in place, will continue to impact groundwater at concentrations that exceed the regulatory enforcement standards for a number of compounds. As these soils are clay in nature capping will do little to change the hydrologic conditions in this area and as such, will do little to mitigate the groundwater impacts.

Any remedial action plan regarding soils should address these issues. If you have any questions or comments regarding these issues feel free to contact me at 715 635-4049.

Sincerely Jamie Dunn

Hydrogeologist Northern Region Remediation & Redevelopment Program

Cc: Bill Greg – AECOM, 332 Minnesota Street, Suite E1000, St. Paul, MN 55101

