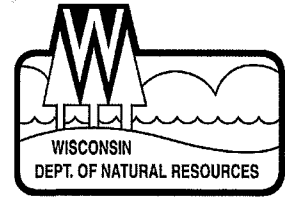


State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
810 W. Maple Street  
Spooner WI 54801

02-16-215744  
Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



September 3, 2013

Mr. David Weber  
Superior Water Light & Power  
2915 Hill Avenue, PO Box 519  
Superior WI 54880

Subject: SWL&P MGP

Dear Mr. Weber:

As requested by SWL&P, I have reviewed the soils and groundwater data collected from the SWL&P MGP site over the past number of years. I also shared the data with a member of the Northern Region's Closure committee regarding further work required to meet site closure criteria. I further discussed the concept of splitting the closure of the site to the on-land portion vs. the sediment portion rather than as one (whole) site.

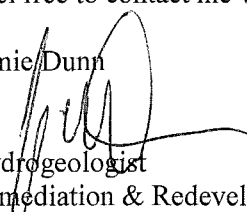
Further investigation and source removal needs to be carried out in the areas of the former gas holders (MW-3 and MW-4) due to high soils and groundwater contamination present.

It is not the practice of the Department to split sites (sediments/on-land) to achieve closure of one portion of a site. NR 716 requires the degree and extent of the complete site be determined and remediation be carried out to the extent practicable.

This review of the data supplied indicates that further investigation and remediation will be required to achieve site closure.

Feel free to contact me with any questions regarding the site.

Jamie Dunn

  
Hydrogeologist  
Remediation & Redevelopment Program

Cc: Bill Gregg - Summit Envirosolutions, Inc.