

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor Scott Hassett, Secretary Gloria L. McCutcheon, Regional Director Southeast Region Headquarters 2300 N. Dr. Martin Luther King, Jr. Drive P.O. Box 12436 Milwaukee, Wisconsin 53212-0436 Telephone 414-263-8500 FAX 414-263-8716 TTY 414-263-8713

March 8, 2004

Mr. Mark Collins WE Energies 231 W. Michigan St. Milwaukee, WI 53290-0001

FID#241496530/BRRTS#02-41-000320 # 024 155 705 4

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Subject: Former Wisconsin Gas Third Ward MGP Site, Milwaukee, WI

Dear Mr. Collins:

The Wisconsin Department of Natural Resources (Department) is in receipt of the following document submitted by ARCADIS G&M, Inc. relating to the above mentioned site: Site-Wide Groundwater Investigation and Remedial Action Options Report. After an initial review the Department conceptually concurs with the ARCADIS proposal for remediation including the previous soil treatment (in-situ and ex-situ), engineered barriers, natural attenuation and groundwater monitoring. Natural attenuation is contingent upon demonstrating that areas of impacted groundwater are stable or receding and do not pose a threat to human health or the environment. The Department also has the following comments on the current plan:

- Please assess the utilities in the area as receptors and migration pathways.
- In addition to the well proposed, the Department recommends additional well nests north of W-42D, southeast of W-51S, and southwest of B-44D to better define the extent of the plume boundaries and the potential discharge to the Milwaukee River.
- A recovery well should be considered in the shallow source area near W-23S.
- Although you propose to sample semi-annually, groundwater flow information should be collected quarterly for a minimum of eight quarters to better assess the groundwater flow conditions at the site.
- Please provide additional information and justification of the criteria that you propose to use to define an increasing trend and the need for re-evaluation of the proposed remedial actions.

The Department appreciates the actions you have taken so far to investigate and restore the environment at this site. If you have any questions please contact me at the address above or at (414)263-8557.

Sincerely,

Margaret M. Brunette Margaret M. Brunette, P.G.

Hydrogeologist

Remediation and Redevelopment Program

Cc: Michael Maierle – ARCADIS G&M

