



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
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November 12, 2009

Tom Jansen
WE Energies
231 W. Michigan St.
Milwaukee, WI 53203

Dear Mr. Jansen:

Subject: Third Ward MGP, reference FID #241496530, BRRTS #0241000320, review of your five year groundwater monitoring progress report, and your follow-up response to my draft comments.

Thank you for preparing additional information for me in response to initial closure committee comments that I had in a file memo. The department has reviewed your response and has following comments:

- Remediation by natural attenuation of the remaining groundwater contamination at this site may not meet the code requirement for "reasonable period of time" due to the presence of remaining DNAPL. Continue with free-product DNAPL removal. Determine if the efficiency of removal can be increased.
- Continue with groundwater monitoring at well W-46D, W-22I, and W22S for a minimum of four additional quarters to make sure the concentrations there continue to go down. Also continue monitoring for a minimum of four quarters at wells W-20I, and W-42D (W-42D for two additional quarters).
- The last two column dates for W22-S seem to be wrong or out of sequence. Please submit a corrected version of page 9 of Table 4 from the 5-year groundwater evaluation report.
- The department still has concerns that your groundwater flow maps show upper shallow groundwater flow direction consistently towards the river which does not support your argument that there could not be contaminant flux into the river.
- Regarding a possible offsite source for contamination near well 46-D, it is the department's opinion that Babcock Auto is not a source as the department issued an offsite exemption letter to them.

If you have any questions about this letter, please call me at 920-892-8756 extension 3023.

Sincerely

John Feeney
Wisconsin Department of Natural Resources