



August 27, 2021

Sent Via E-Mail

Erika Biemann
American Transmission Company, LLC
W234 N2000 Ridgeview Parkway Court
Pewaukee, WI 53188

Jeffery Jaeckels
Madison Gas & Electric
623 Railroad Street
Madison, WI 53703

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations
ATC Transformer Fire- MG&E Blount Substation
722 East Main Street, Madison, WI 53703
BRRTS #: 02-13-584085, FID #: 113435520

Dear Ms. Biemann and Mr. Jaeckels:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the ATC Transformer Fire-MG&E Blount Substation case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The ATC Transformer Fire- MG&E Blount Substation site was investigated for a discharge of hazardous substances and/or environmental pollution associated with a fire that occurred on July 19, 2019. American Transmission Company, LLC (ATC) had a 138 kV transformer explode at the MGE Blount Substation in downtown Madison. The ruptured transformer released a portion of the approximately 17,000 gallons of mineral oil (a coolant) that it contained and caused a large fire. The Madison Fire Department (MFD) and Truax Fire

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Department (TFD) used aqueous film forming foam (AFFF) fire suppressant agents for firefighting that contained perfluoroalkyl and polyfluoroalkyl substances (PFAS). Case closure is granted for PFAS compounds and mineral oil as documented in the case file. The site investigation and/or remedial action addressed soil, groundwater, and surface water. The remedial actions consisted of excavation and off-site disposal of approximately 1,000 tons of shallow soils and recovery and treatment of approximately 165,000 gallons of impacted fire-fighting water that was pumped from storm sewers and vaults in the vicinity of the substation. Contamination remains in soil at the site.

The case closure decision and COs required were based on the current use of the site for industrial purposes. The site is currently zoned industrial. Based on the land use and zoning, the site meets the industrial use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (CITY, WI)	COS APPLIED
722 East Main Street, Madison (Source Property)	-Residual Soil Contamination -Structural Impediment

CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

SOIL

Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains as indicated on the enclosed map (Figure B.2.b., Residual Soil Contamination, July 20, 2020). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies

with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

Structural Impediment (Wis. Stat. § 292.12(2)(b), Wis. Admin. Code §§ NR 726.15(2)(f), NR 727.07(2))

The existing substation structures and subsurface grounding grid present below the entire property made complete site investigation and/or remediation of the contamination on this property impracticable. Upon removal of the structural impediment, the property owner shall investigate the degree and extent of PFAS contamination obstructed by the structural impediment. If contamination is found at that time, the property owner shall remediate the contamination in accordance with Wis. Admin. Code chs. NR 700 to 799.

OTHER CLOSURE REQUIREMENTS

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200)

The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction-related dewatering activities, including utility work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for discharge of *Contaminated Groundwater from Remedial Action Operations* may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before removing a structural impediment

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement.

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SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search “BOTW.” Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching “RRSM.”

Send written notifications to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search “RR submittal portal” (<https://dnr.wi.gov/topic/Brownfields/Submittal.html>). Questions on using this portal can be directed to me or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search “RR contacts” and select the EPA tab (<https://dnr.wi.gov/topic/Brownfields/Contact.html>).

CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (608) 219-0112 or stevenl.martin@wisconsin.gov.

Sincerely,



Steven L. Martin, P.G.
South-Central Region Team Supervisor
Remediation & Redevelopment Program

Attachments:

Figure B.2.b., Residual Soil Contamination, July 20, 2020

cc. Leo Linnemanstons, AECOM, linnemanstons@aecom.com

Additional Resources:

The DNR fact sheets listed below can be obtained by visiting the DNR website at “dnr.wi.gov,” search the DNR publication number.

Guidance for Electronic Submittals for the Remediation and Redevelopment Program (RR-690)






Continuing Obligations for Environmental Protection (RR-819)

Environmental Contamination and Your Real Estate (RR-973)

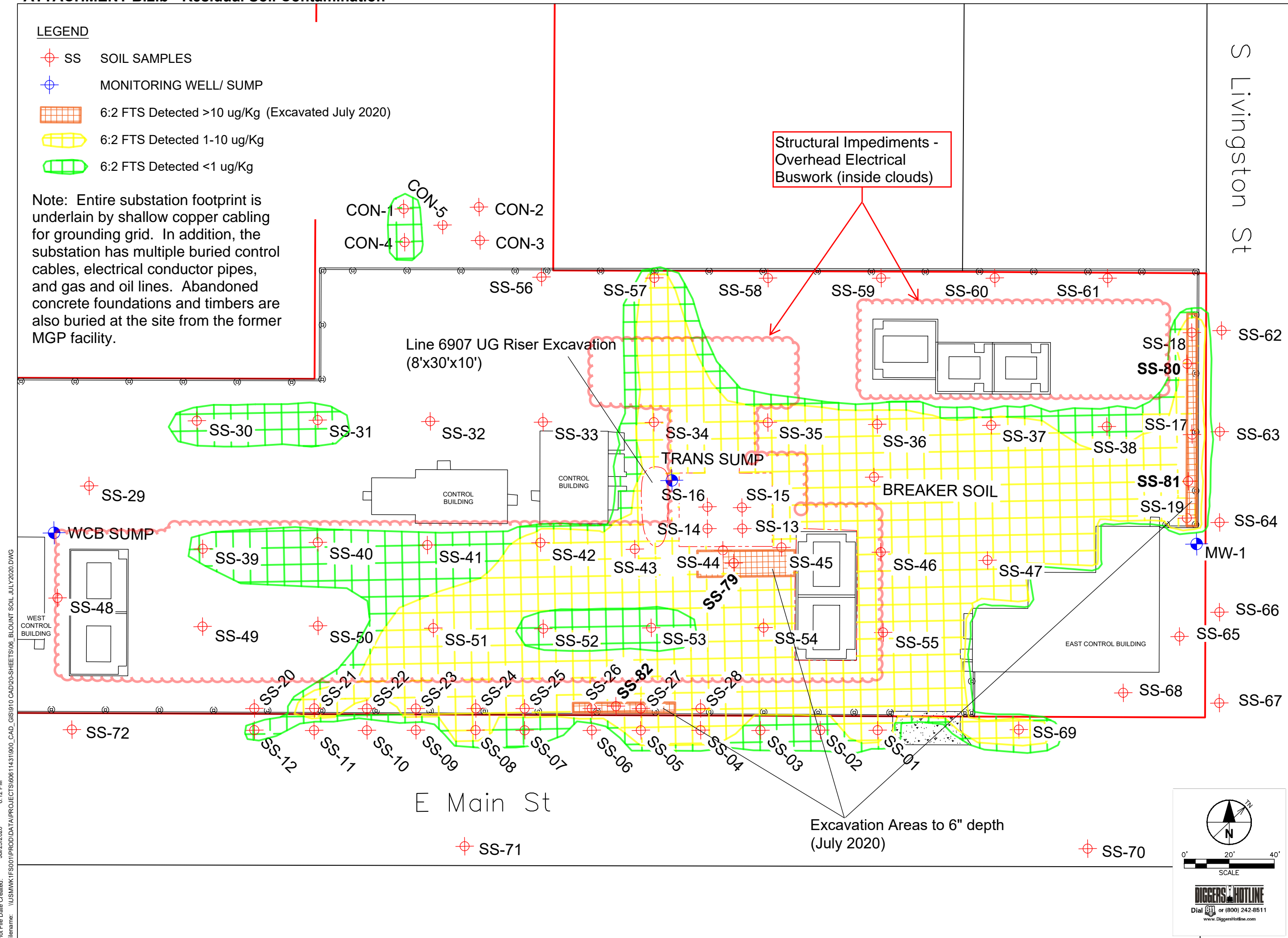
Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup (RR-987)

ATTACHMENT B.2.b - Residual Soil Contamination

LEGEND

-  SS SOIL SAMPLES
-  MONITORING WELL/ SUMP
-  6:2 FTS Detected >10 ug/Kg (Excavated July 2020)
-  6:2 FTS Detected 1-10 ug/Kg
-  6:2 FTS Detected <1 ug/Kg

Note: Entire substation footprint is underlain by shallow copper cabling for grounding grid. In addition, the substation has multiple buried control cables, electrical conductor pipes, and gas and oil lines. Abandoned concrete foundations and timbers are also buried at the site from the former MGP facility.



PROJECT
 ATC BLOUNT
 SUBSTATION
 RESPONSE AND
 CLEANUP
 MADISON, WISCONSIN

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 MILWAUKEE, WI 53212
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REGISTRATION

ISSUE/REVISION

NO.	DATE	DESCRIPTION

KEY PLAN

PROJECT NUMBER

60611431

DRAWING TITLE

PFAS SOIL REMOVAL AREAS

DRAWING NUMBER

Figure 3

SHEET NUMBER

Plotted By: joel.mackinney
 Plot File Date Created: Jul/23/2020 6:12 PM
 Filename: \\USMVK\F5001\PROJ\DATA\PROJECTS\60611431\800_CAD_GIS\910_CAD\20-SHEETS\06_BLOUNT SOIL JULY 2020.DWG

