



May 7, 2025

Hal Siegrist  
RockGen Energy, LLC  
2346 Clear View Road  
Cambridge, WI 53523

SENT BY ELECTRONIC MAIL

Subject: DNR Comments on Supplemental Site Investigation Report  
RockGen Energy Center, 2346 Clear View Road, Cambridge, WI  
DNR BRRTS Activity #02-13-587341

Dear Hal Siegrist:

On December 17, 2024, the Wisconsin Department of Natural Resources (DNR) received “Supplemental Site Investigation Report” (Report), dated November 2024, prepared on your behalf by TRC Environmental Corporation. The Report was accompanied by the appropriate fee for DNR review and response per ch. NR 749, Wisconsin Administrative Code.

### Background

The Report summarizes site investigation activities performed as scoped in the *Supplemental Site Investigation Work Plan*, dated August 2021, and *Supplemental Site Investigation Work Plan Addendum*, dated March 2023, through the 2023 calendar year. Site investigation activities performed through the 2023 calendar year included:

- Soil samples collected within and around the stormwater retention basin
- Surface water samples collected within the stormwater retention basin
- Stormwater sample collected from stormwater outlet
- Installation of eight water table monitoring wells
- Installation of eight multiport monitoring wells
- Routine groundwater monitoring from entire groundwater monitoring network

The Report recommends and requests no further action for any additional future sampling for soil, surface water, and stormwater. The Report also recommends quarterly groundwater sampling from the entire groundwater monitoring well network through calendar year 2024 and using EPA Method 1633 from a NR 149 certified laboratory to analyze groundwater samples if available. After completion of calendar year 2024 groundwater sampling, another Supplemental Site Investigation Report (future SSI Report) will be prepared and submitted to DNR.

### DNR Comments:

DNR provides the following comments on the Report and comments to consider as you prepare the future SSI Report.

- The Report states that potential impacts to off-site receptors were determined to not exist in a previous Site Investigation Report. DNR has reviewed groundwater data through 2024 and notes that groundwater concentrations of perfluorooctanoic acid (PFOA) in the most downgradient multiport well (MP-08) have increased from non-detect in March 2024 to 13 nanograms per liter (ng/L) in July 2024 and 12 ng/L in

September and November 2024. The Wisconsin Department of Health Services (DHS) recently updated the proposed NR 140, Wis. Adm. Code, Enforcement Standard (NR 140 ES) for PFOA to 4 ng/L. The private well located at 2304 Carpenter Swain Road is downgradient from MP-08 and was last sampled in July 2021. The private well at 2304 Carpenter Swain Road should be resampled as soon as practicable.

- Based on the information currently available to DNR, no additional soil, surface water, or stormwater sampling is required at this time.
- The completion reports for the multiport wells in Appendix B do not include MP-06, MP-07, or MP-08. Please submit the completion reports for MP-06, MP-07 and MP-08.
- The Report describes MW-08 as being a water table monitoring well. However, based on the boring log and well construction log, it appears MW-08 is screened below the water table and is actually acting as a piezometer. Evaluate the need for a water table monitoring well in this location and consider abandoning MW-08.
- The future SSI Report should provide additional discussion and relevant figures regarding the hydrogeology and groundwater plume dynamics at the depth intervals being monitored. This includes, but is not necessarily limited to:
  - Potentiometric surface maps of depth intervals being monitored
  - Calculation and discussion of vertical hydraulic gradients
  - Calculation and discussion of groundwater velocity at different depth intervals
  - Evaluation of groundwater plume dynamics at different depth intervals
  - Evaluation of data from the groundwater monitoring network to determine additional groundwater monitoring needs and potential data gaps
- DNR notes that the NR 720 Direct Contact Residual Contaminant Limits (RCLs) provided in Table 4 of the Report have recently been updated and can be found at <https://dnr.wisconsin.gov/topic/Brownfields/soil.html>.
- DNR notes that the proposed NR 140 ESs provided in Table 6 of the Report have recently been updated and can be found at <https://www.dhs.wisconsin.gov/water/gws.htm>.

DNR appreciates your efforts to investigate and remediate this site. If you have any questions, please contact me at (608) 206-5809 or [luke.lampo@wisconsin.gov](mailto:luke.lampo@wisconsin.gov).

Sincerely,



Luke Lampo  
Hydrogeologist  
Remediation and Redevelopment Program

cc: Jeff Ramey, Langan