



Mr. Greg Prom  
Allete, Inc.  
30 West Superior St.  
Duluth, MN 55802

SUBJECT: Pre-Design Investigation Work Plan  
Superior Water Light and Power Manufactured Gas Plant Site  
Winter Street and USH 53, Superior, WI  
BRRTS ID #: 02-16-275446

Dear Mr. Prom,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the Pre-Design Investigation Work Plan (Work Plan) for the Superior Water Light and Power (SWL&P) Manufactured Gas Plant (MGP) site referenced above. The Work Plan was prepared and submitted to the DNR on your behalf by Foth Infrastructure and Environment, LLC (Foth). The DNR received the Work Plan on February 7, 2020.

The Work Plan proposes additional investigation of the slip and stability of shoreline structures, additional work to characterize the soil and sediments near potential excavation and dredge areas, define migration pathways, and evaluate fate and transport of contaminants. Overall, the Work Plan appears adequate to address the identified data gaps and will assist in development of remedial action options and a remedial action plan for the site.

Below are comments regarding the proposed work:

- Section 3.2 of the Work Plan states that the monitoring wells installed to evaluate groundwater at the locations of the elevated percent reference emitter (%RE) were detected during the LIF survey will be installed as temporary monitoring wells and abandoned following sampling. Please be aware that if the wells are installed as temporary wells and elevated concentrations of contaminants of concern (COCs) or free product are found, additional sampling to determine consistency and trend of contaminant concentrations or free product properties will not be possible. An evaluation of the adequacy of the current permanent monitoring well network and its ability to assess contamination detected in the temporary wells network will be needed. Also, as we discussed during our telephone conversation on February 27, 2020, proper development of a temporary monitoring well is critical to ensure analysis of dissolved phase contamination.
- Sediment sampling conducted by Summit EnviroSolutions and USEPA detected PAH contamination greater than the DNR Consensus Based Sediment Quality Guidelines Probable Effect Concentrations (either total PAHs or individual) in sediment samples collected at locations SW15-SB06, S25, and SPG6. These sample locations fall outside of the site boundary as defined by Foth. The Work Plan investigation should be adjusted as necessary to include the SW15-SB06 area.

Based on the results of the work conducted to date and proposed in the Work Plan, the DNR may request additional actions to determine the degree and extent of contamination associated with the former MGP or to assist in remedial action option evaluation.

Please contact me if you would like to discuss the above comment or any other aspects of the proposed work.

Sincerely,

A handwritten signature in black ink, appearing to read "John Sager". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Sager".

John Sager  
Hydrogeologist  
Remediation and Redevelopment Program

C: Mr. Steve Garbaciak, Foth Infrastructure and Environment, LLC