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March 17, 2020

John Sager
Wisconsin Department of Natural Resources
Superior Service Center
1701 N 4th Street
Superior, WI 54880

RE: Clarification on the Pre-Design Investigation (PDI) Work Plan for Superior
Former Manufactured Gas Plant (MGP), WDNR BRRRTS #02-16-275446

Dear Mr. Sager:

The intent of this letter is to clarify the scope of the sediment investigation as described in the Pre-Design Investigation Work Plan (PDI Work Plan) for the Former Manufactured Gas Plant (Site), dated February 2019, associated with WDNR BRRRTS #02-16-275446, owned by Superior Water, Light & Power, (SWL&P) Superior, Wisconsin. In your approval letter received via email on March 2, 2020, you provided the following comment:

Sediment sampling conducted by Summit Envirosolutions and USEPA detected PAH contamination greater than the DNR Consensus Based Sediment Quality Guidelines Probable Effect Concentrations [PEC] (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.

We appreciate your willingness to discuss these samples and how we might be able to complete the PDI, refine the upcoming Remedial Action Options Report (RAOR), and begin the design process for the remedy SWL&P is eager to implement. We have considered your request to adjust the investigation to include the SW15-SB06 area. As we have discussed with you through the development of the Site Investigation Report (SIR) and the initial work on the RAOR, we believe the extent of sediment contamination associated with the Former MGP is limited to the head end of the Graymont boat slip and the boundaries of this area are as shown in the SIR and PDI Work Plan. Areas where the PEC was exceeded in individual, isolated, samples are best characterized as outliers and



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the source of the PAHs found there is likely to be of mixed origin, and not solely the Former MGP.

The area around sample location SW15-SB06 is bounded on all sides by sediment samples with total PAH concentrations well below the PEC (S8, S16, S17, S25, and SPG-5), with the samples in closest proximity to SW15-SB06 having maximum total PAH concentrations at any sample interval of 0.0044 mg/kg (S15), 4.32 mg/kg (S8), and 4.99 mg/kg (S17). All three of these samples are within 60 feet of SW15-SB06. This data distribution gives us a high level of confidence that any PAH contamination found at SW15-SB06 is limited in extent and not directly or solely related to the Site.

In response to your request, the outer extent of PAH impacts in sediment associated with the Site will be confirmed by collecting cores C-11, C-12, and C-13 as the first three after mobilization of the drill rig. Rapid turnaround of the PAH analyses of these samples has been set up with our subcontractor laboratory. We will review the data from these three locations while the remainder of the sediment samples are being collected, and if that data confirms the conceptual site model established in the SIR and upon which the PDI Work Plan is based, we do not anticipate the need for additional sampling.

SWL&P appreciates the opportunity to provide you with this response to your comment in the approval letter for the PDI Work Plan. SWL&P requests that WDNR consider this response and confirm that we may proceed with implementation of the PDI. If you have any additional questions, please contact me at (218) 355-3191.

Sincerely,

A handwritten signature in blue ink that reads 'Greg Prom'. The signature is fluid and cursive, written in a professional style.

Greg Prom
Senior Environmental Compliance Specialist

cc:

Jamie Mehle, SWL&P
Joscelyn Skandel, SWL&P
Erin Hughes, Foth
Brian Hanks, Foth
Steve Garbaciak, Foth