



May 5, 2022

Greg Prom
Minnesota Power / Allete
30 West Superior Street
Duluth, MN 55802
(sent via email only to gprom@mnpower.com)

Subject: Response to SWL&P Comments on the DNR's Review of the 90% Design,
Upland Area Remedial Action Design Report
Superior Water Light & Power Manufactured Gas Plant
Winter Street and US Highway 53, Superior, Wisconsin
BRRTS ID #: 02-16-275446

Dear Mr. Prom,

The Wisconsin Department of Natural Resources (DNR) has completed a review of the response to DNR's comments on the 90% Design, Upland Area Remedial Action Design Report, for the Superior Water Light & Power (SWL&P) Manufactured Gas Plant site referenced above. The comment responses were prepared on behalf of SWL&P by Foth Infrastructure and Environment LLC (Foth) and submitted to the DNR in a letter dated March 29, 2022.

The revisions to the design report address many of DNR's comments. Foth maintains the remedial action will address contamination such that no further active remedial action will be necessary, and closure of the site will be possible under Wis. Admin. Code ch. NR726, based on the predictive modeling and design criteria established in the 90% Design.

As you are aware, the DNR questions whether the field performance will attain the predicted performance of the remedial action as designed. If the proposed remedial action is not sufficient to obtain closure of this site under Wis. Adm. Code ch. NR726, the DNR will consider the remedial action an interim action under Wis. Adm. Code ch. NR708 and additional remedial action will be necessary to bring the site to closure.

Because SWL&P and Foth intend to proceed with the proposed remedial action, the DNR recommends SWL&P and Foth incorporate the revisions into the 100% design report and submit for DNR review. Please contact me if you have any questions.

Sincerely,

John Sager
Hydrogeologist
Remediation and Redevelopment Program

C: Jamie Mehle, SWL&P
Erin Hughes, Foth
Chris Saari, DNR