



January 20, 2023

Dennis Oehring  
RockGen Energy  
2346 Clear View Road  
Cambridge, WI 53523

SENT BY ELECTRONIC MAIL

Subject: Response to NR 708 PFAS Soil Interim Action and Construction Documentation Report  
RockGen Energy, 2346 Clear View Road, Cambridge, WI 53523  
DNR BRRTS Activity #02-13-587341

Dear Mr. Oehring:

On October 7, 2022, the Wisconsin Department of Natural Resources (WDNR) received “NR 708 PFAS Soil Interim Action and Construction Documentation Report” (the Report), dated September 2022, prepared by TRC Environmental Corporation (TRC). The Report also requests a no further action determination for impacted soil. The request was accompanied by the appropriate review fee, required under Wis. Admin. Code s. NR 749. The Report has satisfactorily met the requirements of Wis. Admin. Code s. NR 708. The WDNR reviewed the no further action request, and the request is not recommended at this time. The WDNR provides the following comments:

**Background:**

The Report details several interim actions performed to remove sources of per- and polyfluoroalkyl substances (PFAS) contamination and address the infiltration pathways of PFAS into groundwater via impacted soil and stormwater. Interim actions performed include:

- Removal and disposal of the fire suppression system which contained Ansulite 3% Aqueous Film-Forming Foam (AFFF). A new fire suppression system was installed and uses a non-fluorinated foam (Ansul NFF 3x3 UL201)
- Installation of an asphalt cap in the area west of the fire suppression building where direct discharge of AFFF reportedly occurred
- Installation of a geosynthetic cap in the following areas:
  - A portion of the swale on the western side of the Fuel Unloading Area and existing asphalt
  - The partially covered piping network on the eastern side of the Fuel Unloading Area
  - The area on the eastern side of the Fire Pump House and between two of the Site’s storage tanks
- Abandonment of the potable well and replumbing the potable water supply to an existing industrial well
- Removal, disposal, and replacement of the septic system and mound
- Excavation of approximately 1,093 tons of soil and material were transported to a permitted hazardous waste landfill

The Report also requests a no further action determination for PFAS impacted soils at the Site based on the interim actions performed. The WDNR reviewed the request for no further action determination and provides the following comments:


**WDNR Response:**

The Report has satisfactorily met the requirements of Wis. Admin. Code s. NR 708. WDNR has the following comments which should be addressed as site investigation activities continue:

- Determine and describe where surface water in the western swale ultimately drains to.
- Section 2.2 of the Report states “these interim actions will reduce PFAS stormwater concentrations by addressing the source of the PFAS in soil. By removing the source of stormwater PFAS, the concentrations in the forested stormwater drainage channel area on the northwest portion of the property would naturally attenuate and decrease over time.” **Stormwater samples were collected prior to performing any interim actions. Evaluate the need to collect additional stormwater samples to document a reduction of PFAS in stormwater.**
- Section 13.0 and Appendices S and T of the Report describe post-construction maintenance and inspections of the asphalt and geosynthetic caps as required by NR 708.11(4). **Submit a revised maintenance plan for the asphalt cap and geosynthetic cover using WDNR guidance document RR-980 (Maintenance Plan Example Template for a Straightforward Site).**
- Section 15.0 of the Report requests no further action for PFAS impacted soils at the Site based on the implementation of the interim actions. **WDNR does not approve of this request. Additional soil investigation is needed within the stormwater retention basin located in the northwest corner of the property. The retention basin is a potential source of PFAS contamination in groundwater as stormwater impacted by PFAS may have drained into the basin. At least one soil sample should be collected from the lowest point in the stormwater retention basin. If pooled surface water is present within the basin during soil sampling, a surface water sample should also be collected.**

WDNR 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 & Redevelopment Program

cc: Jeff Ramey, TRC