



March 23, 2023

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

SENT BY ELECTRONIC MAIL

Subject: Approval of Supplemental Site Investigation Workplan Addendum
RockGen Energy, 2346 Clear View Road, Cambridge, WI
DNR BRRTS Activity #02-13-587341

Dear Mr. Oehring:

On March 13, 2023, the Wisconsin Department of Natural Resources (DNR) received “Supplemental Site Investigation Work Plan Addendum” (Workplan), dated March 2023, prepared on your behalf by TRC Environmental Corporation (TRC). The request was accompanied by the appropriate review fee, required under ch. NR 749, Wisconsin Administrative Code.

Background:

The Workplan proposes the following site investigation activities to further delineate degree and extent of per- and poly-fluoroalkyl substances (PFAS) in soil, stormwater, and groundwater:

- Soil sampling in and around the stormwater retention basin
- If present, surface water sampling in the stormwater retention basin
- Stormwater sampling at the storm sewer outlet
- On-site installation of one multiport well
- Off-site installation of two multiport wells and one monitoring well, pending an access agreement
 - If an access agreement is not reached prior to the beginning of scheduled field work, the two multiport wells will be installed on-site near the property boundary. The off-site monitoring well will not be installed.

DNR Response:

DNR approves of the proposed site investigation activities and provides the following comments:

- As of the date of this letter, DNR understands an access agreement has not yet been made to allow installation of off-site wells, however, negotiations between applicable parties are ongoing. **Please keep DNR updated on the status of achieving an access agreement.**
- Section 4.4.2 of the Workplan states “Up to three rounds of periodic groundwater sampling will be conducted for the newly installed wells. Some or all existing Site wells (monitoring wells, piezometer, and multiport wells/intervals) will also be sampled during the same events. Decisions to not sample existing Site wells and/or multiport intervals will be made based on prior sampling results. Groundwater samples will be analyzed by a laboratory certified under NR 149 for the list of 33 PFAS analytes for the newly installed wells. A subset of PFAS analytes from the list of 33 PFAS may be selected for the existing Site wells based on prior sampling results.” **Any decisions to not sample existing Site wells**

and/or multiport intervals, and/or to analyze groundwater samples for a select subset of PFAS analytes from the 33 PFAS list, should be made with DNR concurrence.

NR 726.09(2)(e) requires a minimum of eight successive quarterly rounds of sampling to demonstrate compliance with either the applicable requirements of NR 140 or the requirements of NR 726.05(6), unless otherwise directed or requested and approved by DNR.

DNR notes verbal approval was given to not sample groundwater during the first quarter of 2023. DNR expects quarterly groundwater sampling to resume in the second quarter of 2023.

- Section 5.2 of the Workplan states a Site Investigation Report Addendum will present the results of the Supplemental Site Investigation. **The Site investigation Report Addendum should be compliant with NR 716.15.**
- The Workplan addresses most of the comments DNR provided in the letter “Response to NR 708 PFAS Soil Interim Action and Construction Documentation Report”, dated January 20, 2023. **One comment has yet to be addressed – “determine and describe where surface water in the western swale ultimately drains to”. This comment should be addressed in the Site Investigation Report Addendum.**

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.

Sincerely,



Luke Lampo
Hydrogeologist
Remediation & Redevelopment Program

cc: Jeff Ramey, TRC