From: McIlheran, Adam S - DNR
To: Amundson, Alex
Cc: Prasad, Narendra M; Fassbender, Judy L - DNR; Endsley, Erin A - DNR
Subject: Review of WEC SOP for Substation Retirements
Date: Friday, January 3, 2025 10:25:00 AM
Attachments: image001.png
image002.png
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image005.png
20250102_WEC SubStation SOP with all comments and revisions shown.docx
20250103_WEC SubStation SOP Revised Draft.docx

Alex,

DNR has completed its review of the revisions WEC had for the Substation Retirement SOP, submitted 10/3/2024. The first attached document is the marked-up SOP with all previous and new comments and changes, the second is the latest draft incorporating those changes and is likely more readable in terms of current SOP language. DNR revisions are generally clarifications to the Tier classifications and review process. Since the word document we are working from is still (I believe) a conversion from a pdf of the SOP previously submitted some years ago, some of the formatting may not be precise, especially with Table 1. WEC may want to revise into a more editable version for later drafts/revisions if necessary.

Key concepts in SOP revisions:

- Tier 1 NFA sites are those with 250 CY or less of soil removed that meet the other listed criteria including no use of Industrial Direct Contact RCLs as a cleanup standard, since that would be continuing obligation of industrial site use and NFA can't have a CO.
- Tier 2 NFA sites are those with greater than 250 CY of soil removed that meet the other listed criteria including no use of Industrial Direct Contact RCLs as a cleanup standard, since that would be continuing obligation of industrial site use and NFA can't have a CO.
- Tier 3 sites are those that do not meet Tier 1 or 2 criteria and will then follow NR 716 and 726.
- All site will need at some point a fee submittal requesting use of MIO SSRCL for that particular site.
- The goal of sites meeting Tier 2 NFA conditions is a quicker response time through NR 708 process compared to NR 716 & 726 reporting and documentation process.

After you have had time to review, I believe Judy will plan to set up a meeting to discuss any questions on the various aspects of this latest, and hopefully close to being final, version of the SOP.

Regards,

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DRAFT

Standard Operating Procedure

Electrical Substation Retirement
Investigation, Remediation and Reporting Protocol
2025

The purpose of this Standard Operating Procedure (SOP) is to document the process for the investigation, remediation and Wisconsin Department of Natural Resources (WDNR) reporting protocol for WEC Energy Group (WEC) substation retirements.

This SOP provides salient background information, the overall objective and a description of a multi-tier process for the investigation, remediation and reporting of substation retirements.

1.0 BACKGROUND

WEC electrical substations are typically fenced operating facilities constructed at minimum one foot above the surrounding area that contain a control house or power distribution center (PDC), power transformers, and various switching, protection and control equipment. The substations may also be enclosed by structural walls or buildings.

Select substation equipment contains mineral insulating oil **(MIO).** This MIO-containing equipment often includes, but is not limited to, transformers, circuit breakers, reclosers, capacitor banks, and voltage regulators. For older equipment, the MIO may contain or may have previously contained polychlorinated biphenyls (PCBs). Most new circuit breakers and reclosers do not contain oil. The majority of equipment containing MIO with PCBs has either been replaced or refilled with non-PCB MIO.

MIO is a non-volatile insulating oil consisting primarily of aliphatic hydrocarbons in the C11 - C33 range and is used for its dielectric, cooling and other beneficial properties in electrical equipment. MIO is a highly-refined petroleum hydrocarbon product similar to food-grade mineral oil and is stable at high temperatures. The MIO mixture is relatively immobile in the subsurface and partitioning to groundwater or other media is typically negligible due to the mineral oil's high soil sorption coefficient, low water solubility and low vapor pressure.

Over time, WEC substations are retired, often on a time-critical basis. MIO and other soil impacts may be encountered during these activities, particularly at older substations. These impacts are typically the result of incidental, low volume MIO releases over time. If painted structures are present at the site and the paint surfaces are deteriorated (i.e., flaking), lead-based paint (LBP) impacts in surface soils may also be encountered during retirement activities. Due to the many similarities in the constituents of concern, the nature and extent of impacts, investigation and remediation methods, equipment configuration and other factors, retirement activities at most substation sites are typically very similar.

2.0 SOP OBJECTIVE

This SOP's objective is to establish a more efficient and streamlined process for investigating, remediating, and reporting for WEC substation sites undergoing retirement that allows for maintaining time-sensitive, critical-path construction schedules while satisfying applicable WDNR regulatory requirements.

3.0 MULTI-TIER PROCESS DESCRIPTION

3.1 Process Establishment

Three tiers of investigation, remediation and reporting have been established to meet the above objective.

- Tier 1 - Response Action - NR 708 Reporting
- Tier 2 - Remedial Action - Streamlined NR 700 Reporting
- Tier 3 - Remedial Action - Standard NR 700 Reporting

The tier of investigation, remediation and reporting will be site-specific and established based on the following types of information (and subsequent initial subsurface investigation, if warranted):

- Age of the substation;
- Volume of known soil impacts above state regulatory standards;
- Current and historical equipment MIO sampling data (PCB content);
- Visual observation of potential impact s (e.g., MIO ground surface staining, flaking paint on structures or equipment);
- Presence of unusual or complex site conditions; and,
- Previous environmental assessment information.

If the above information does not indicate a release or potential release, no further assessment will be conducted. At WEC's discretion, sampling may be conducted for soil management and disposal purposes.

If a release or potential release is identified, an initial subsurface investigation will be conducted to further assess the extent of impacts. This initial investigation will include limited sampling to establish whether MIO, PCB and/or LBP soil impacts are present and the physical character of the subsurface (e.g., shallow soil physical characteristics and, if necessary, the elevation of the surficial water bearing unit).

In most cases, the initial subsurface investigation sampling will be conducted in areas of apparent or suspected surface staining and the vicinity of MIO-containing equipment soil samples will be analyzed for PCBs, and DRO as MIO if VOCs/PAHs are not analyzed. In areas of equipment or structures with flaking paint, soil samples will be collected for lead analysis.

If a release is confirmed by the initial subsurface investigation sampling, WDNR will be notified (via either the Spills Hotline or Form 4400-225) and the risk level will be established (i.e., "low-risk site" or "non-low-risk site"). The site will be considered a "low-risk" site if all of the following conditions are present:

- Soil impacts greater than WDNR residual contaminant levels (RCLs) or MIO SSRCL are confined to the site property;
- Impacts greater than WDNR RCLs or MIO SSRCL are confined to surficial soils (0 - 4 ft. bgs);
- Groundwater was not encountered within the zone of soil impacts greater than WDNR RCLs or MIO SSRCL;
- The impacted soil is not located within a floodplain; or the substation site can be demonstrated to show that the design and construction are above the 100 year flood plain (WEC's design criteria for all substations is to construct one foot above the 100 year flood plain); and
- The impacted soil at the site is not located adjacent and/or upgradient of a wetland, critical habitat area or navigable river, stream, lake, pond or flowage.

Most substation sites will be designated low-risk sites based on WEC experience and the above conditions.

Low-risk sites will follow the Tier 1 or Tier 2 process described below. The Tier 1 and Tier 2 classification will be based on the anticipated remediation volume. The Tier 1 and Tier 2 implementation processes will be differentiated primarily by the scope of WDNR reporting. Sites that are not classified as low-risk sites (i.e., "non-low-risk sites") will follow the Tier 3 process.

The three-tier process is summarized in Attachment A and described in the following sections.

3.2 Tier 1 - Response Action - NR 708 Reporting

The Tier 1 (Response Action) process will generally be conducted pursuant to NR 708.05(3) (non-emergency immediate action).

Site Conditions

The Tier 1 process will be implemented for low-risk sites with an estimated soil remediation volume of approximately 250 cubic yards or less and for which no WDNR "continuing obligations" apply or inclusion on the WDNR online database of contaminated sites would not be required.

Investigation

The Tier I investigation will be conducted to refine the horizontal and vertical extent of MIO, PCBs (if applicable) and LBP impacts established during the initial subsurface investigation. Typically, the investigation of MIO impacts will consist of Geoprobe® soil borings advanced to depths of approximately 5 to 10 feet bgs and the investigation of LPB impacts will consist of soil boring borings advanced to depths up to 3 feet bgs. Two to three soil samples will typically be collected for laboratory analysis from each soil boring location. In limited access areas, hand auger borings may be advanced in lieu of Geoprobe® borings. In some cases, soil sampling may instead be completed following excavation with samples being collected at the excavation limits.

Soil samples collected to assess MIO impacts will be analyzed for PCBs, using analytical method USEPA Method SW 846 3540C and DRO as MIO (C10-C28). PCBs would not be included for analysis if it can be shown or documented that they were not in any MIO used or stored onsite. Soil samples collected to assess LBP impacts will be analyzed for total lead (USEPA Method SW 846).

Select soil samples may be analyzed for toxicity characteristic leaching procedure (TCLP) benzene, TCLP Resource Conservation and Recovery Act (RCRA) metals, and/or other target analytes for waste characterization (disposal profiling), as required by the applicable disposal facility.

Remediation

Remediation will generally consist of excavation and off-site disposal at a licensed landfill. The limits of impacted soil removal will be based on the investigation results and the following cleanup levels, as applicable:

MIO	PCBs (Aroclor-specific) Less than WDNR non-industrial direct contact RCLs.
	PCBs (total) Less than Groundwater Residual Contaminant Levels (GWRCLs).
	DRO Less than 500 mg/kg.
LBP	Lead (total) Less than BTV (Background Threshold Value).

Confirmation soil samples will be collected from the base and sidewalls of the soil removal excavations to document that the above cleanup levels are met. A minimum of one base sample and four sidewall samples will typically be collected with no greater distance than 15 feet between samples or any other reasonable distance to be determined depending on the size of the excavation (unless physical or safety constraints are present).

For excavations of PCB remediation waste (PCBs > 1 mg/kg), PCB composite sampling will be conducted in general accordance with Subpart O of 40 CFR 761. In general, this sampling will consist of a composite of nine aliquots within each 3-meter (10-foot) by 3-meter (10-foot) grid.

The excavated soil will be disposed as a non-TSCA waste (at a licensed Subtitle D landfill facility) if the PCB concentration is less than 50 mg/kg in accordance with the June 10, 2014 EPA "Risk-Based Approvals to Dispose of Polychlorinated Biphenyl (PCB) Remediation Waste" for Utility Solid Waste Activities Group (USWAG) member companies. If PCB concentrations are greater than or equal to 50 mg/kg, the soil will be disposed as a TSCA-regulated waste in accordance with 40 CFR 761.61.

WDNR Communications and Reporting

WDNR communication and reporting for the Tier 1 process will consist of the following 3 steps (in chronological order):

- WDNR notification pursuant to NR 706.05 via the Spills Hotline or, using "Notification For Hazardous Substance Discharge (Non-Emergency Only)" (Form 4400-225). If notification is done via email, notification of consultant, results of the initial subsurface investigation and "WEC SOP Tier 1 (Response Action)" will be noted in the comments section of the form.
- Update WDNR PM or Regional Spills Coordinator via email upon completion of response action field activities (investigation and remediation).
- Submit documentation ("No Further Action" letter) pursuant to NR 708.05(6). This will be accompanied by WDNR Technical Assistance form 4400-237 with fee for approval of a Site-Specific Soil Cleanup Standard (use of the MIO SSRCL) and request for a written No Further Response Action (NFA) determination from WDNR pursuant to NR 708.09.

Remediation of soil classified as a PCB remediation waste under TSCA (i.e., PCBs as found in impacted soil > 1 mg/kg) will be conducted pursuant to 40 CFR 761.61(b) “performance-based

disposal." EPA notification, reporting, and approvals are not required for performance-based disposal.

3.3 Tier 2 - Remedial Action - Streamlined NR 700 Reporting

The Tier 2 (Remedial Action - Streamlined NR 700 Reporting) process will be conducted in accordance with NR 716 through NR 726, except that WDNR reporting requirements will be streamlined, as described below.

Site Conditions

The Tier 2 process will be implemented for low-risk sites with an estimated soil remediation volume of greater than approximately 250 cubic yards and no WDNR "continuing obligations" or listing on the WDNR online database. An adequate number of samples will be collected to show residual soil impacts are insignificant in volume. Concurrence between the WDNR and WEC will be determined on a case by case basis for sites to meet Tier 2 criteria.

Investigation

The Tier 2 investigation procedures will be the same as the Tier 1 procedures described in Section 3.2.

Remediation

The Tier 2 remediation procedures will be the same as the Tier 1 procedures described in Section 3.2.

WDNR Communications and Reporting

WDNR communication and reporting for the Tier 2 process will consist of the following three submittals (in chronological order):

- WDNR notification pursuant to NR 706.05 using "Notification For Hazardous Substance Discharge (Non-Emergency Only)" (Fo1m 4400-225). Notification of consultant, results of the initial subsurface investigation and "WEC SOP Tier 2 (Remedial Action - Streamlined NR 700 Reporting)" will be noted in comments section of the form.
- Site Investigation, Remedial Action Options and Remedial Design Report pursuant to NR 716.15 , NR 722.13, and NR 724.09 with Form 4400-237 and appropriate fee for WDNR concurrence site meets Tier 2 criteria of SOP and use of the Site-Specific Soil Cleanup Standard (MIO SSRCL).
- Construction Documentation Report pursuant to NR 724.15 and Form 4400-237 with a No Further Action Request and appropriate fee for WDNR concurrence the site meets criteria for no further action with no continuing obligations or inclusion on the WDNR residual contamination database.

Remediation of soil classified as a PCB remediation waste under TSCA (PCBs > 1 mg/kg) will be conducted pursuant to 40 CFR 761.61(b) "performance-based disposal." EPA notification, reporting, and approvals are not required for performance-based disposal. As applicable, it is understood that WDNR would conduct any EPA notifications deemed necessary pursuant to RR-786 ("PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement").

3.4 Tier 3 - Remedial Action - Standard NR 700 Reporting

The Tier 3 (Remedial Action - Standard NR 700 Reporting) process will be conducted in accordance with NR 716 through NR 726.

Site Conditions

The Tier 3 process will be implemented for non-low-risk sites with or without WDNR "continuing obligations" or inclusion on WDNR online database.

Investigation

The Tier 3 investigation procedures will be documented in a Site Investigation Work Plan pursuant to NR 716.09. In addition to the Tier l procedures for investigating MIO and LBP soil impacts, the investigation procedures would be supplemented, as necessary, to address non-low- risk site considerations (e.g., groundwater, historic fill material, and/or impacts from other constituents of concern or non-typical site conditions). Degree and extent of all contaminants of concern will be defined to applicable RCLs, SSRCL, or BTVs as appropriate for contaminant sources.

Remediation

The Tier 3 remediation process will be consistent with the Tier 2 process described in Section 3.3, with following adjustments to the cleanup levels, as applicable:

MIO	PCBs (Aroclor-specific) Less than WDNR non- industrial or industrial direct contact RCLs or Performance Standards (capping)
	PCBs(total) Less than TSCA regulatory level (1 mg/kg) or self-implementing cleanup levels [40 CFR 761.61(a)]
	MIO SSRCL of 500 ppm DRO could only be used if/where MIO impacts are distinct and not co-mingled with other discharges/sources of VOCs/PAHs.
LBP	Lead (total) Less than WDNR non-industrial or industrial direct contact RCLs or Performance Standards (capping)

As necessary for other cleanup components (e.g., historic fill material/or and commingled petroleum, solvent and/or metals impacts), cleanup levels will include WDNR non-industrial or industrial direct contact RCLs, protection of groundwater RCLs, and/or Performance Standards (capping) depending on the ongoing land use classification of the parcel.

WDNR Communications and Reporting

WDNR communication and reporting for the Tier 3 process will consist of the following submittals (in chronological order):

- WDNR notification pursuant to NR 706.05 using "Notification For Hazardous Substance Discharge (Non-Emergency Only)" (Form 4400-225).
- Consultant hiring notification letter.
- Site Investigation Work Plan pursuant to NR 716.09.
- Site Investigation and Remedial Action Options Report pursuant to NR 716.15 and NR 722.13.
- Remedial Design Report pursuant to NR 724.09.
- Construction Documentation Report pursuant to NR 724.15.
- Case Closure form pursuant to NR 726.09. This will be a WDNR fee submittal for WDNR to issue a written Case Closure determination (with or without continuing obligations).

WEC understands the need for WDNR concurrence, however, depending on timing of retirements WEC may move ahead with cleanup and remediation prior to concurrence with WDNR understanding the potential need for further investigation and remediation.

Remediation of soil classified as a PCB remediation waste under TSCA (PCBs > l mg/kg) will be conducted pursuant to 40 CFR 761.6l(b) " performance- based disposal" or pursuant to 40 CFR 761.61(a) "self-implementing on-site cleanup and disposal." Self-implementing on- site cleanup and disposal notification/reporting would include: "Notification of Self-Implementing Cleanup" to EPA pursuant to 40 CFR 76l(a)(3) and a post-implementation "Cleanup Completion Summary Report" to EPA. As applicable, it is understood that WDNR would conduct any EPA notifications deemed necessary pursuant to RR-786 ("PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement").

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5.0 References

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9. A Forensic Approach for Assessing Modes of Subsurface Petroleum Releases. John A. Anton, and Gil Oudijk, 2016. Journal of Environmental Protection, 2016, 7, 312-322.
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DRAFT ATTACHMENT A

ELECTRICAL SUBSTATION RETIREMENT - INVESTIGATION, REMEDIATION, AND REPORTING PROTOCOL SUMMARY

Tier	Site Conditions, Investigation, and Remediation		WDNR Communications and Reporting
Tier 1: Response Action - NR 708 Reporting	• Low-Risk Site **(1).** No other sources or impacts of VOCs/PAHs besides MIO. • ≤ 250 cubic yards of impacted soil • MIO (PCB) Cleanup Level: < WDNR non-industrial direct contact RCLs (Aroclor-specific) MIO (Total PCB) Cleanup Level: < WDNR GWRCL MIO (DRO) Cleanup Level: < 500 mg/kg by DRO (C10-28) (2) • Lead Cleanup Level: < WDNR BTV • non-TSCA Disposal [< 50 mg/kg per EPA/USWAG Risk-Based Approval (3)] and/or TSCA Disposal (≥50 mg/kg) ■	NR 706.05(1) NR 708.05(3)(3) NR 708.05(6)(6) **NR** 708.09 40 CFR 761.6l(b)	Notification via Spill s Hotline Action and consultant notific Response Action (Non-Emer Update correspondence with Documentation/Final Repor submittal for written No Furt WDNR issues No Further R Performance-based disposal
Tier 2: Remedial Action - Streamlined NR 700 Reporting	• Low-Risk Site (1). No other sources or impacts of VOCs/PAHs besides MIO. • > 250 cubic yards of impacted soil (or other volume as approved by WDNR) • MIO (PCB) Cleanup Level: : < WDNR non-industrial direct contact RCLs (Aroclor-specific) • MIO (Total PCB) Cleanup Level: < WDNR GWRCL • MIO (DRO) Cleanup Level: < 500 mg/kg by DRO (C10-28) (2) • Lead Cleanup Level: < WDNR BTV • non-TSCA Disposal [< 50 mg/kg per EPA/USWAG Risk-Based Approval **(3)]** and/or TSCA Disposal (≥50 mg/kg) • No WDNR "Continuing Obligations" **(4)**	NR 706.05(1), NR 716.09 NR 716.14, NR716.15, NR 722.13, NR724.09 NR 724.15 NR 726.09 40 CFR 761.61(b)	Notification [and results of i hiring notification and Tier 2 procedure] Site Investigation, Remedial Reports Construction Documentation (WDNR fee submittal) WDNR issues Case Closure Performance-based disposal
Tier 3: Remedial Action - Standard NR 700 Reporting	• Non-Low-Risk Site **(1).** Other sources or impacts of VOC/PAHs onsite. • MIO (PCB) Cleanup Level: S WDNR non-industrial or industrial direct contact RCLs (Aroclor-specific) or Performance Standard (capping) ■ MIO (PCB) Cleanup Level: < TSCA regulatory level (1 mg/kg) or self-implementing cleanup levels [40 CFR 76l.61(a)] ■ MIO (DRO) Cleanup Level: < 500 mg/kg by DRO (C10-28) (2) Can. • Lead Cleanup Level: ≤ WDNR non-industrial direct contact RCL or WDNR industrial direct contact RCL or Performance Standard (capping) • non-TSCA Disposal [< 50 mg/kg per EPA/USWAG Risk-Based Approval **{3)]** and/or TSCA Disposal ((>50 mg/kg) ■ With or without WDNR "continuing obligations" (4)	NR 706.05(1) NR 716.09 NR 716.14, NR 716.15, NR 722.13 NR 724.09 NR 724.15 NR 726.09 40 CFR 761.61(b) or 40 CFR 761(a)	Notification (and consultant hiring notifi Site Investigation Work Plan Site Investigation and Remedial Options Re Design Report Construction Documentation Report Case Closure Request form (WDNR fee su WDNR issues Case Closure (with or withc Performance -based disposal (5) or Self-in and disposal {6)

(1) Low-Risk Site Criteria: Soil impacts greater than WDNR residual contaminant levels (RCLs) are confined to the site property; soil impacts greater than WDNR RCLs are less than approximately 5 feet below ground surface (bgs); groundwater was not encountered within the zone of soil impacts greater than WDNR RCLs; the site is not located within a floodplain; and the site is not located adjacent to and upgradient of a wet land, critical habitat area, navigable river, stream, lake, pond, or flowage.

(2) **MIO (DRO) Analysis: Modified** DRO as MIO Method Used. Non-MIO VOCs or PAHs interference cannot be present to use MIO SSRCL.

(3) **EPA/USWAG Risk-Based Approval:** June 10, 2014 "Risk-Based Approvals to Dispose of Polychlorinated Biphenyl (PCB) Remediation Waste" by EPA for Utility Solid Waste Activities Group (USWAG) member companies.

(4) **WDNR "continuing obligations":** Continuing obligation responsibilities and notifications pursuant to NR 727.05 and NR 725.07.

(5) **40 CFR 761.Gl(b), Performance-based disposal notification/reporting:** EPA/40 CFR 761 notification/reporting not required to implement. EPA notification by WDNR pursuant to RR-786 ("PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement"), as applicable.

(6) 40 CFR 761.Gl(a), Self-implementing on-site cleanup and disposal notification/reporting: "Notification of Self-Implementing Cleanup" to EPA pursuant to 40 CFR 761(a)(3). EPA notification by WDNR pursuant to RR-786 ("PCB Remediation in Wisconsin under the One Cleanup Program Memorandum of Agreement"), as applicable. Post-implementation "Cleanup Completion Summary Report" to EPA.