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17 February 2011
CHE8094TA

Ms. Victoria Stovall, Environmental Program Associate
Wisconsin Department of Natural Resources
2300 North Martin Luther King, Jr. Drive
P.O. Box 12436
Milwaukee, Wisconsin 53212-0436

Ref: *Cover Maintenance Plan*
Former North Coal Dock
Port Washington Generating Station
146 South Wisconsin Street
Port Washington, Wisconsin
WDNR BRRTS #02-46-525198
WDNR FID #246004000

Dear Ms. Stovall:

The enclosed *Cover Maintenance Plan (CMP)* for the above referenced project site is being submitted to the Wisconsin Department of Natural Resources (WDNR) on behalf of Wisconsin Electric Power Company (WEPCo) (d.b.a. We Energies) by Geosyntec Consultants (Geosyntec). Pursuant to the WDNR's 25 January 2011 letter to We Energies, the enclosed *CMP* is a revision to the *CMP* submitted to the WDNR on 3 December 2010. In accordance with Item No. 1 of the WDNR letter, a section titled "Plantings" has been added to the *CMP*. This language was preliminarily approved by WDNR (John Feeney) in a 10 February 2010 email to Geosyntec (Curt Hoffart).

With regard to Item No. 2 of the WDNR letter, responsibility for cover system maintenance is documented in the *CMP*. Depending on the location, the "Managing Party" will be WEPCo or the City of Port Washington (City). In addition, the responsibility for areas where the City will be the Managing Party will be documented in lease and sublease agreements between WEPCo and the City which are currently being negotiated (refer to Figure 1 in the CMP for areas subject to the lease and sublease where the City will be the Managing Party). It is expected that the City will approve the language of the lease and sublease agreements in the next few weeks. Final lease/sublease execution can subsequently take place after the Board of Commissioners of Public Lands (BCPL) approves the prime lease with WEPCo (BCPL has already reviewed the proposed language). It is expected that this process may take several months. The lease and sublease agreements will be forwarded to the WDNR (Remediation and Redevelopment Program) after

they are executed. In the interim, We Energies will be responsible for cover system maintenance.

Please contact us if you have any questions.

Sincerely,

Curtis M. Hoffart, CHMM
Project Professional

Gregory L. Johnson, CHMM, P.H., P.G., P.E.
Senior Engineer

cc: John Feeney, WDNR
Doug Eberlein, P.E., We Energies Fossil Operations
Trent Kohl, P.E., We Energies Environmental
Robert Vanden Noven, City of Port Washington

COVER MAINTENANCE PLAN

FORMER NORTH COAL DOCK
PORT WASHINGTON GENERATING STATION
146 South Wisconsin Street
Port Washington, Wisconsin
WDNR BRRTS #02-46-525198
WDNR FID #246004000

INTRODUCTION

This *Cover Maintenance Plan* (CMP) was prepared for the cover system constructed on the former North Coal Dock (NCD), referred to as the site. The site is located east of Port Washington Generating Station (PWGS). The CMP was prepared in accordance with the requirements of NR 724.13(2), Wisconsin Administrative Code. The cover system was constructed to prevent direct contact with and erosion and runoff of residual soil impacts at the site.

Implementation of this CMP will be the responsibility of Wisconsin Electric Power Company (WEPCo) or the City of Port Washington (City) (Managing Party) pursuant to applicable lease/sublease agreements for various parcels on which the cover system is located.

BACKGROUND INFORMATION

Site investigation and remediation activities are documented in a publically available Wisconsin Department of Natural Resources (WDNR) file referenced by WDNR Facility Identification (FID) Number 246004000 and Bureau for Remediation and Redevelopment Tracking System (BRRTS) Number 02-46-525198. The WDNR file includes the following documents salient to the site cover system:

Site Investigation Work Plan, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 19 March 2008.

Site Investigation Report, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 3 December 2008.

Site Investigation Report Addendum, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 9 February 2009.

Remedial Action Design Report, North Coal Dock Soil Removal Phase, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 13 April 2009.

Remedial Action Design Report, North Coal Dock Cover System Phase, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 12 August 2009.

Remedial Action Documentation Report - North Coal Dock, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 18 February 2010.

The WDNR contact for the site is as follows:

Mr. John Feeney
Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
1155 Pilgrim Parkway
Plymouth, WI 53073
Phone: 920-892-8756
Fax: 920-892-6638
Email: john.feeney@wisconsin.gov

DESCRIPTION OF RESIDUAL CONTAMINATION

Residual contamination at the site generally consists of unsaturated soil (at depths less than the post-cover system construction depth to groundwater of approximately 12 to 16 feet below ground surface) impacted by polynuclear aromatic hydrocarbons (PAHs) and metals above applicable direct contact soil standards, residual saturated soil impacted by volatile organic compounds (VOCs) above applicable protection of groundwater soil standards, and groundwater impacted by VOCs, metals and sulfate above applicable groundwater protection standards.

The site cover system was constructed to prevent direct contact with and the erosion and runoff of residual unsaturated soil impacts. Residual saturated soil and groundwater impacts are being addressed by groundwater monitoring to demonstrate compliance with NR 726 closure criteria (stable or declining residual groundwater contaminant concentrations).

DESCRIPTION OF COVER SYSTEM

In general, the cover system was constructed pursuant to the WDNR's *Guidance for Cover Systems as Soil Performance Standard Remedies* (WDNR, 2007), and the *Guidance on Case Closure and the Requirements for Managing Continuing Obligations* (WDNR, June 2009). The cover system consists of the following components:

- Minimum of four inches of asphalt pavement.
- Minimum of two feet of clean soil cover in vegetated areas.
- Minimum of six inches of gravel in unvegetated areas.

The extent of the cover system is depicted on attached Figure 1.

The cover system is located on all or portions of three parcels of land, which have recently been established in connection with the planned change in use of portions of the NCD from utility to public use. Cover system land use will include the following:

- The cover system area on the eastern portion of the NCD will be converted to public use pursuant to a sublease agreement between WEPCo and the City. The parcel subject to the sublease agreement is located east of the pre-power plant construction ordinary high water mark and is leased by WEPCo from the Wisconsin Board of Commissioners of Public Lands (BCPL).

- The cover system area on the west end of the NCD is located on property currently owned by WEPCo and will be converted to public use pursuant to a lease agreement with the City.

- The cover system area on the southwest portion of the NCD is located within a new PWGS security fence on property currently owned by WEPCo and will remain utility use.

The future parcel boundaries and land use are depicted on Figure 1.

ANNUAL INSPECTION

The cover system will be inspected once per year, normally in the spring after snow and ice melt to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. The inspections will assess erosion, cracks and deterioration that may cause exposure to underlying soils. The inspections will be performed by the WEPCo. Any area where underlying impacted soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained and documented on the attached Cover Inspection Log. The Cover Inspection Log will include recommendations for necessary repair of any areas where underlying impacted soils are exposed. Once repairs are completed, they will be documented in the Cover Inspection Log. A copy of the Cover Inspection Log will be retained by WEPCo and available for review by WDNR representatives upon request.

MAINTENANCE ACTIVITIES

If cover system deterioration is observed during the annual inspection or at any other time during the year, repairs will be scheduled as soon as practical. Cover system repairs may include isolated patching, filling or resurfacing or reconstruction of a portion of the cover system. In the event that necessary maintenance activities expose the underlying impacted soil, the Managing Party must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personnel protection equipment (PPE). The Managing Party must also sample any soil that is excavated from the site prior to disposal to identify management options. The soil must be treated, stored and disposed by the Managing Party in accordance with applicable local, state and federal law.

In the event the cover system overlying the impacted soil is removed or replaced, the replacement barrier must be equally protective. Any replacement barrier will be subject to the same maintenance

and inspection guidelines as outlined herein unless indicated otherwise by the WDNR or its successor.

A copy of this *Cover Maintenance Plan* will be maintained at the address of the Managing Party.

PLANTINGS

Tree and bush plantings may be installed on the cover system. These plantings would be installed in accordance with the maintenance repair and soil management provisions of this *Cover Maintenance Plan*. If planting activities expose potentially impacted soil underlying the cover system, the Managing Party must inform workers of the direct contact exposure hazard and provide them with appropriate PPE. Any removed impacted soil must be treated, stored and disposed by the Managing Party in accordance with applicable local, state and federal law. Following planting installation, the cover system disturbed by the planting activities must be restored to its original condition.

LIMITATION OF ACTIVITIES AND NOTIFICATIONS PRIOR TO MODIFYING COVER SYSTEM

The following activities are prohibited on any portion of the cover system unless prior written approval has been obtained from the WDNR:

- Removal of the existing cover system
- Replacement with another cover system
- Excavating or grading
- Filling
- Plowing for agricultural cultivation
- Construction or placement of a building or other structure

AMENDMENT OR WITHDRAWAL OF COVER MAINTENANCE PLAN

This *Cover Maintenance Plan* can be amended or withdrawn by the Managing Party and its successors with the written approval of the WDNR.

CONTACT INFORMATION

WDNR	John Feeney Remediation and Redevelopment Program 1155 Pilgrim Parkway Plymouth, WI 53073	Phone: 920.892.8756 Email: john.feeney@wisconsin.gov
WEPCo	Doug Eberlein, P.E. Project Manager, Fossil Operations 231 W. Michigan Street Milwaukee, WI 53203	Phone: 414.221.2299 Email: doug.eberlein@we-energies.com
City of Port Washington	Robert Vanden Noven City Engineer/Public Works Director 100 West Grand Avenue Port Washington, WI 53074	Phone: 262.284.2600 Email: rvandennoven@ci.port-washington.wi.us

LEGEND

- EXISTING CONTOUR (584)
- FENCE
- FINAL COVER CONTOUR (592)
- EXISTING GENERATING STATION BUILDING
- EXISTING RIPRAP
- EXISTING ASPHALT PAVEMENT
- EXISTING CONCRETE PAVEMENT
- EXTENT OF COVER SYSTEM
- EXTENT OF VEGETATED SOIL COVER
- EXTENT OF GRAVEL COVER
- EXTENT OF ASPHALT COVER
- FUTURE PROPERTY BOUNDARY

SCALE IN FEET

0 150'

Geosyntec consultants

CLIENT:	WE ENERGIES
PROJECT:	FORMER NORTH COAL DOCK PORT WASHINGTON GENERATING STATION PORT WASHINGTON, WISCONSIN
TITLE:	EXTENT OF COVER SYSTEM
PROJECT: CHE8094TA	
DATE: November 16, 2010	FILE NO. 1110CoverSYS022

FIGURE 1

COVER INSPECTION LOG

FORMER NORTH COAL DOCK
PORT WASHINGTON GENERATING STATION
146 South Wisconsin Street
Port Washington, Wisconsin

Inspection Date	Inspector	Condition of Cover	Recommendations	Has recommended maintenance from previous inspection been implemented?