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By

July 3, 2012

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

RE: CONSTRUCTION DOCUMENTATION REPORT and COVER MAINTENANCE PLAN – SOUTH COAL DOCK, PORT WASHINGTON GENERATING STATION, 146 SOUTH WISCONSIN STREET, PORT WASHINGTON, WI
WDNR BRRTS #02-46-525198, FID # 246004000

Dear Ms. Stovall:

The enclosed documents for the above referenced project are being submitted for Department review. A $500.00 technical review fee was previously submitted. I can be reached at 414-221-2162 if you have any questions.

Sincerely,

Mark J. Collins
Principal Consultant

Enclosures (2)

cc: Mr. John Feeney, WDNR, w/o enclosures

COVER MAINTENANCE PLAN

FORMER SOUTH 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 South Coal Dock (SCD), 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 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 - South Coal Dock, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 2 February 2011.

Construction Documentation Report - South Coal Dock, Port Washington Generating Station, North and South Coal Docks, Geosyntec Consultants, 14 June 2012.

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 10 feet below ground surface) and groundwater impacted by polynuclear aromatic hydrocarbons (PAHs) and metals above applicable soil and groundwater standards.

The site cover system was constructed to prevent direct contact with and the erosion and runoff of residual unsaturated soil impacts. Residual 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

The cover system is located on portions of two parcels of land, which have recently been established in connection with the change in use of portions of the SCD from utility to public use. The parcels are described as follows:

- The east portion of the SCD 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 (OHWM) and is leased by WEPCo from the Wisconsin Board of Commissioners of Public Lands (WBCPL).

- The west portion of the SCD (east of OHWM) remains utility use pursuant to a lease agreement between WEPCo and WBCPL.

The parcel boundaries are depicted on Figure 1.

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 cover system on the east portion of the SCD includes a constructed wetland habitat area, including a migratory bird stopover pond and adjacent features. The pond is surrounded by a berm. A walking path and vegetated areas are located outside of the pond berm. A drainage swale is located along the west margin of the pond berm.

The cover system on the west portion of the SCD consists of a re-graded existing gravel surface tied into the new grades on the eastern portion of the SCD. A minimum of 6 inches of gravel was maintained. The western margin of the SCD cover system consists of asphalt pavement located adjacent to the PWGS facility.

The extent of the cover system is depicted on attached 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 soil. The inspections will be performed by the WEPCo. Any area where underlying impacted soil has become or is likely to become exposed will be documented. The inspections will be documented on the attached Cover Inspection Log. The Cover Inspection Log will include recommendations for necessary repair of any areas where underlying impacted soil is exposed. Once repairs are completed, they will be documented on 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:

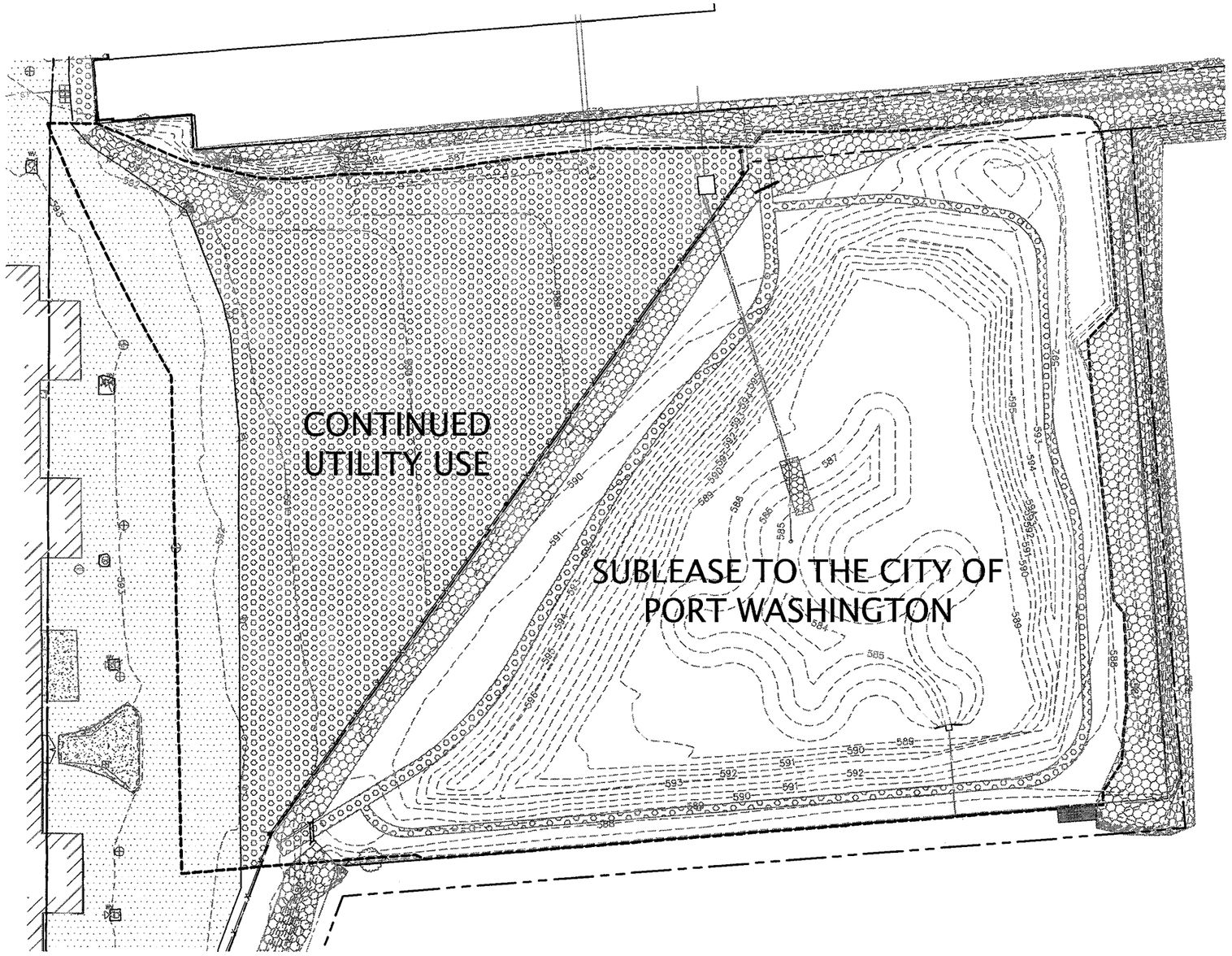
- Removal of the existing cover system
- Replacement with another cover system
- Excavating or grading
- Filling
- Plowing for agricultural cultivation
- Construction or placement of a building or other structure

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 Power Generation	Doug Eberlein, P.E. Project Manager 231 W. Michigan Street Milwaukee, WI 53203	Phone: 414.221.2299 Email: doug.eberlein@we-energies.com
WEPCo Environmental Department	Mark Collins Principal Hydrogeologist 333 W. Everett Street Milwaukee, WI 53203	Phone: 414.221.2162 Email: mark.collins@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

- APPROXIMATE EXTENT OF COVER SYSTEM
- 584 — AS-CONSTRUCTED TOP OF COVER SYSTEM ELEVATION CONTOUR (FT MSL)
- FENCE
- EXISTING GENERATING STATION BUILDING
- RIPRAP
- GRAVEL SURFACE
- ASPHALT PAVEMENT
- FISHING PLATFORM
- ST — POND FILL AND DISCHARGE PIPE
- PUMP HOUSE
- PROPERTY BOUNDARY

N

SCALE IN FEET

0 80'

Geosyntec consultants

CLIENT:	WE ENERGIES
PROJECT:	FORMER SOUTH COAL DOCK PORT WASHINGTON GENERATION STATION PORT WASHINGTON, WISCONSIN
TITLE:	EXTENT OF COVER SYSTEM
PROJECT: CHE8094TA	FIGURE NO.: 1
DATE: June 7, 2012	FILE NO206PWGSREM01

FIGURE 1

COVER INSPECTION LOG

FORMER SOUTH 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?