



Consulting
Engineers and
Scientists

November 29, 2017

Project 1609370

Mr. Robert Leigh
WEC Business Services, LLC
700 N. Adams Street, PO Box 19001
Green Bay, Wisconsin 54307-9001

**Re: Construction Certification for the Weston Units 3 & 4 Ash Basins Liner Retrofit
Wisconsin Public Service Corporation, Weston Generating Station
Rothschild, Wisconsin**

Dear Mr. Leigh,


GEI Consultants, Inc. (GEI) is pleased to provide this construction certification for the retrofit of the Weston Units 3 & 4 Bottom Ash Basins at the Wisconsin Public Service Corporation (WPSC) Weston Generating Station, Rothschild, Wisconsin. The basins were originally designed, permitted, and constructed in accordance with chapter NR 213 - *Lining of Industrial Lagoons and Design of Storage Structures* of the Wisconsin Administrative Code. However, with the promulgation of new federal rules on April 17, 2015, the lining system of the basins did not meet the minimum criteria of 40 CFR Part 257 Subpart D - *Disposal of Coal Combustion Residuals from Electric Utilities*.

On January 13, 2017, WPSC submitted a Wastewater System Approval Request and engineering report to the Wisconsin Department of Natural Resources (WDNR) to retrofit the Weston Units 3 & 4 Bottom Ash Basins in accordance NR 213. The approval request and engineering report meet the requirements of § 257.102(k) – *Criteria to Retrofit and Existing CCR Surface Impoundment* to retrofit the basins with a lining system meeting the requirements of § 257.70(c) of the federal rules. The WDNR approved the retrofit plan on February 16, 2017. The WDNR also determined that liner retrofit construction activities would be regulated under NR 216 – *Storm Water Discharge Permits* and in accordance with Wisconsin Pollutant Discharge Elimination System (WPDES) General Permit No. WI-S067831-05.

Construction to retrofit the basins began on April 3, 2017, with the general contractor mobilizing to the site and installing stormwater and erosion control measures. The retrofit and site restoration work were substantially completed with the submittal of a *Notice of Termination – Storm Water Discharges Associated with Land Disturbing Construction Activities General Permit* by WPSC to the WDNR on November 16, 2017.

In accordance with § 257.102(k)(4) upon completion a qualified professional engineer must prepare a certification verifying that the retrofit activities have been completed in accordance with the retrofit plan.

I, John, M. Trast, P.E., hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wisconsin Administrative Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wisconsin Administrative Code; and that, to the best of my knowledge, all information contained in this document is correct; the construction of the Weston Units 3 & 4 Bottom Ash Basins Liner Retrofit was completed in accordance with the Weston Units 3 & 4 Bottom Ash Basins Retrofit, Closure, and Post Closure Care Plan dated September 2016, the engineering report titled Weston Units 3 & 3 Bottom Ash Basins Retrofit Plan dated January 2017, and in compliance with all applicable requirements in 40 CFR Part 257 Subpart D and Chapter NR 213 of the Wisconsin Administrative Code.



John M. Trast, P.E.
Professional Engineer License No. 31792

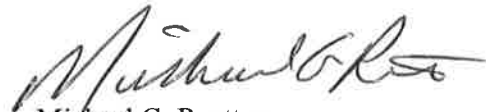


If you have any questions related to this construction certification for the Weston Units 3 & 4 Bottom Ash Basins please call Mr. John Trast at 920-455-8299.

Sincerely,

GEI CONSULTANTS, INC.


John M. Trast, P.E.
Senior Consultant


Michael G. Ruetten
Vice President

JXT:cah

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