

July 31, 2018



Wisconsin Department of Natural Resources

Attn: Mr. Ralph Smith 101 South Webster Street Madison, Wisconsin 53707

Subject:

Bayside Forestry EQ, Inc. Injection/Infiltration Permit BRRTS #03-16-000971 PECFA #54873-8210-22

Dear Mr. Smith:

The purpose of this correspondence is to provide information for the approval of an injection/infiltration request for the Bayside Forestry EQ, Inc.in Bennett, Wisconsin. A request documenting injection intent along with the required fee has previously been forwarded to the Northern Region RR EPA.

Cover Sheet Components BRRTS Activity Number:

03-16-000971

Site Name: Bayside Forestry EQ, Inc. 9222 East County Highway L Bennett, Wisconsin 54873

Responsible Party:

Bradley Keseluk 9222 East County Highway L Bennett, Wisconsin 54873

Environmental Consultant:

REI Engineering, Inc. 4080 N 20th Avenue Wausau, WI 54401 715-675-9784 Attn: David Larsen <u>dlarsen@reiengineering.com</u>

Request Type: Technical Review

Fee:

\$700.00



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4080 N. 20th Avenue Wausau, WI 54401 715-675-9784 REIengineering.com Wisconsin Department of Natural Resources Mr. Ralph Smith Bayside Forestry EQ, Inc. – Injection Request July 30, 2018

Infiltration/Injection Components

Infiltration / Injection:

Injection

Injectate: Granulated Carbon Slurry (Reactivated Carbon GR-320-IRC using the CleanInject ™ process)

Contaminants Being Treated:

Dissolved phase petroleum compounds

Implementation Plan:

Proposed 45 injection points.

19 injection locations, 7 injection intervals with an injection depth of 4-12 feet and an injectate rate of 40# per injection interval (9,000 pounds of injectate).

Actual injection location, depth, intervals and injection rate may vary based site-specific circumstances.

Constraints on Injection System:

Access to an adjoining property will be required to complete the injection plan.

Time Frame for Approval:

Site work is proposed for August 2018, site time to completion is anticipated at five (5) days.

Location of Proposed Injection Wells:

See attached Figure 1 (Proposed Injection Locations) which documents proposed injection locations and injection rates.

Injection Specific Monitoring Plan:

Groundwater sampling frequency will be at the direction of the WDNR Project Manager. Quarterly groundwater sampling, PVOC/N parameters, will commence no later than 90 days after injection completion.

Pre-Injection Vapor Screening:

Vapor screening was addressed in the January 2018 Sub Slab Vapor Intrusion Report

Additional Information Needed for Injection of Reactive Materials

Granulated Carbon GR-320-IRC using the CleanInject m process excludes the use of reactive materials. GR-320-IRC is a mixture of both coal and coconut activated carbon with 90% of particle sizes less than 44 microns. Concentrations of the injectate range from 20-40 pounds GR-320-IRC per interval for this proposed application. No additional groundwater monitoring wells are anticipated for this proposed scope. Post injection groundwater monitoring has

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been approved and any modifications to the approved plan will need to be authorized by the WDNR Project Manager.

If you have any questions or comments, please contact our office at (715) 675-9784 or electronically at dlarsen@reiengineering.com.

Sincerely, REI Engineering, Inc.

David N. Larsen P.G. Senior Hydrogeologist / Project Manager

cc: Mr. Bradley Keseluk, 9222 East County Highway L, Solon Springs, Wisconsin 54873

Attachments:

Figure 1 – Proposed Injection Locations Attachments:

GR-320-IRC-V Specification Sheet GR-320-IRC-R Specification Sheet GR-320-IRC Safety Data Sheet State of Wisconsin Department of Natural Resources Bureau of Water Quality PO Box 7921, Madison WI 53707-7921 dnr.wi.gov

Notice of Intent (NOI) Contaminated Groundwater from Remedial Action Operations WPDES Permit No. WI-0046566-07-0 Rev. 06/2018

Notice: Pursuant to chs. NR 200 and 205, Wis. Adm. Code, this notice of intent (NOI) is required to request coverage under the Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. WI-0046566-07-0 for discharges of contaminated groundwater to waters of the state of Wisconsin. Failure to complete this form in its entirety may result in a returned NOI or a denied NOI. Personal information collected will be used for administrative purposes and may be provided to requestors to the extent required by Wisconsin Open Records law [ss. 19.31-19.39, Wis. Stats.].

SECTION I: FACILITY	PROJECT LOCATION IN	FORMATION		
Facility/Project Name		Facility Mailing Address (i.e. PO Box, Street, or Route)		
Bayside Forestry EQ, Inc.		9222 East County Highway L		
Facility/Project Physical Address (i.e. Street or Route)		City, State, Zip Code		
9222 East County Highway L		Bennett, Wisconsin 54873		
County	Facility Phone No.	Facility Fax No.	Facility Email Address	
Douglas				
SECTION II: FACILITY	CONTACT INFORMATI	ON		
Facility Operator/Plant Manager		Title		
Bradley Keseluk		Owner		
Company		Contact Mailing Address (i.e. PO Box, Street, or Route)		
		9222 East County Highway L		
City, State, Zip Code		Contact Phone No.	Alternative Phone No.	
Bennett, Wisconsin 54873				
Contact Fax No.		Contact Email Address		
Discharge Monitoring Contact Name		Title		
David Larsen		Senior Hydrogeologist		
Company		Contact Mailing Address (i.e. PO Box, Street, or Route)		
REI Engineering, Inc.		4080 N. 20 th Avenue		
City, State, Zip Code		Contact Phone No.	Alternative Phone No.	
Wausau, WI 54401		715-675-9784	715-675-4060	
Contact Fax No.		Contact Email Address		
		dlarsen@reiengineering.com		
Authorized Representative Name		Title		
Bradley Keseluk		Owner		
Company		AR Mailing Address (i.e. PO Box, Street, or Route)		
Bayside Forestry EQ, Inc.		9222 East County Highway L		
City, State, Zip Code		AR Phone No.	Alternative Phone No.	
Solon Springs, WI 54873				
AR Fax No.		AR Email Address		

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Notice of Intent (NOI) Contaminated Groundwater from Remedial Action Operations WPDES Permit No. WI-0046566-07-0 Rev. 06/2018

SECTION III: FACILITY OWNER MAILING ADDRESS (if different from Authorized Representative)						
Facility Owner Name			Title			
Same as Authorized Representative						
Parent Company			Owner Mailing Address (i.e. PO Box, Street, or Route)			
City, State, Zip Code			Owner Phone No.	Alternative Ph	ione No.	
Contact Fax No.			Contact Email Address			
SECTION IV: DISCH	ARGE CHARACT					
Type of Wastewater (check all that apply):	Discharge Frequency (e.g. Annual, Monthly, Daily)	Average Daily Flow (gallons of water discharged per day)	Type of Wastewater (check all that apply):	Discharge Frequency (e.g. Annual, Monthly, Daily)	Average Daily Flow (gallons of water discharged per day)	
Treated wastewater from groundwater remediation project			Cleaning or decontamination wastewaters from the cleaning of treatment equipment for a remediation project			
☐ Infiltration or injection of a substance or remedial material for remediation of soil or groundwater			Other (describe type)			
Treated wastewater from dewatering of construction trenches or pits			Other (describe type)			
Landspreading or spray irrigation of agricultural chemical contaminated wastewater SECTION V: ELIGIBI	LITY CHECKLIST	r	Other (describe type)			

1. Is the wastewater discharged from and/or to properties within tribal lands (i.e. land owned by or held in trust for the tribes and land within recognized reservation boundaries)?

Yes. Your discharge is not eligible for this General Permit. If all discharges from your facility go to or come from properties in tribal lands, you do not require regulation under a WPDES discharge permit. Therefore, skip the rest of the NOI and sign the last page. We will remove you from our tracking system. The Tribe or United States

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Environmental Protection Agency (EPA) regulates discharges within tribal lands.

 \boxtimes No. Proceed to question 2.

2. Is the wastewater discharged to a Publicly Owned Treatment Works (i.e. sanitary sewer)? A septic system is <u>not</u> considered a sanitary sewer.

Yes. Your discharge is not eligible for this General Permit. If all discharges from your facility go to a sanitary sewer, you do not require regulation under a WPDES discharge permit. Therefore, skip the rest of the NOI and sign the last page. We will remove you from our tracking system. If at some point in the future operations at your facility result in a discharge, you will need to inform the Department. If only some or no discharges from your facility go to the sanitary sewer, please proceed to question 3.

No. Proceed to question 3.

3. Are any of the following wastewaters discharged or mixed with the above wastewaters to surface water or groundwater: Contact or noncontact cooling water, water from boiler cleaning operations, air compressor condensate contaminated with oil and grease, softener regeneration backwash, municipal wastewater, domestic wastewater, or process wastewaters from the production of any material or product, or other wastewater not otherwise cover by this general permit?

Yes. Your discharge is not eligible for this General Permit. Skip the rest of the NOI and complete the certification on last page. Contact the Department to obtain application for an individual WPDES discharge permit.

No. Proceed to question 4.

4. What is the receiving water for your discharge? If your facility has more than one outfall, indicate in the space provided which outfalls go to groundwater and which go to surface waters. *(check all that apply)*

Groundwater Discharge (any wastewater that is allowed to infiltrate or seep into the soil from a permeable surface including but not limited to any drain field, agricultural field, ditch, swale, depression, trench or pit, adsorption pond, infiltration pond, rain garden, prairie, or vegetative area that may impact groundwater quality). If you will only be discharging to groundwater, please proceed to question 5.

Outfall #(s):

] Wetland Discharge (any discernible, confined and discrete conveyance system including but not limited to any pipe, ditch, channel, tunnel, conduit, swale, or storm sewer that will carry wastewater to a wetland. Wetlands mean an area where water is at, near or above the land surface long enough to be capable of supporting aquatic or hydrophytic vegetation and which has soils indicative of wet conditions). If you will only be discharging to wetlands, please proceed to question 5.

Outfall #(s):

Note: The Department will need to determine if your discharge would cause significant adverse impacts to wetlands

Surface Water Discharge (any discernible, confined and discrete conveyance system including but not limited to any pipe, ditch, channel, tunnel, conduit, swale, or storm sewer that will carry wastewater to a creek, stream, pond, marsh, bay, reservoir, river, lake, or other surface water within the state of Wisconsin). Proceed to question 4A.

Outfall #(s):

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A. What is the name(s) of the surface water your discharge enters?

Proceed to question 4B.

B. What is the Water Body Identification Code (WBIC) of the surface water your discharge enters?

Proceed to question 4C.

Note: The WBIC for a specific surface water can be found at: http://dnr.wi.gov/water/waterSearch.aspx.

C. Is the discharge directly to a surface water classified as an outstanding or exceptional resource waters as defined in ch. NR 102, Wis. Adm. Code.?

Yes. Your discharge is not eligible for this General Permit. Skip the rest of the NOI and complete the certification on last page. Contact the Department to obtain application for an individual WPDES discharge permit.

No. Proceed to question 4D.

D. Is the discharge directly to a surface water classified as a public water supply (i.e. Lake Superior, Lake Michigan and Lake Winnebago) in ch. NR 104, Wis. Adm. Code?

Yes. Your discharge is not eligible for this General Permit. Skip the rest of the NOI and complete the certification on last page. Contact the Department to obtain application for an individual WPDES discharge permit.

No. Proceed to question 5.

5. Does the discharge contain water treatment additives (i.e. biocides such as microbicides, fungicides, molluscicdes, chlorine, etc.) or water quality conditioners (i.e. scale and corrosion inhibitors, pH adjustment chemicals, oxygen scavengers, conditioning agents, water softening compounds, etc.) that may enter surface water or groundwater without receiving wastewater treatment or that are used in a treatment process but are not expected to be removed by wastewater treatment?

Yes. For each additive used, please fill out and attach an Additive Review Worksheet. Additive Review Worksheets must be completed to receive coverage under this general permit. The Additive Review Worksheet is not required for additives with active ingredients consisting of chlorine, hypochlorite, sulfuric acid, hydrochloric acid or sodium hydroxide. Also, chemicals used in an industrial process generating wastewater that eventually receives treatment or chemicals added as part of wastewater treatment process (such as ferric chloride, alum or pickle liquor) are not considered water treatment additives and need not require an additive review. Proceed to question 6.

No. Proceed to question 6.

6. Will chlorine-based compounds be used to control the growth of micro-organisms in the treatment system or used to decontaminate the treatment system after completion of the remediation project?

Yes. Proceed to question 6A.

 \boxtimes No. **Proceed to question 7.**

A. Will chemicals be used to dechlorinate the wastewater prior to discharge to surface water?

Yes. The wastewater will be dechlorinated with chemicals. Proceed to question 7.

No. The wastewater will not be dechlorinated with chemicals. Proceed to question 7.

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Notice of Intent (NOI) Contaminated Groundwater from Remedial Action Operations WPDES Permit No. W1-0046566-07-0 Rev. 06/2018

7. Is a discharge management plan attached to this NOI that includes all the information necessary from Section 3 of the permit?

Yes. Proceed to question 8.

No. This form will be considered incomplete and returned to you.

8. Has the groundwater at the site been analyzed for contaminants and are the results attach to the discharge management plan?

Yes. Proceed to question 9.

No. This form will be considered incomplete and returned to you.

9. If a treatment facility is required for the treatment of contaminated groundwater, have the plans and specifications been submitted to or approved by the department under s. 281.41, Wis. Stats., and ch. NR 108, Wis. Adm. Code?

Yes. Proceed to Section VI.

No. Please contact wastewater plan review staff to find out how to get the plans approved. Proceed to Section VI.

Note: Department wastewater plan review staff can be found here: <u>http://dnr.wi.gov/topic/wastewater/planreviewers.html</u>.

Additionally, department plan submittal requirements can be found here: <u>http://dnr.wi.gov/topic/wastewater/AdequateSubmittal.html</u>.

SECTION VI: CERTIFICATION

This form must be signed by a responsible executive or municipal officer, manager, partner or proprietor as specified in s. 283.37(3), Wis. Stats., or a duly authorized representative of the officer, manager, partner or proprietor that has been delegated signature authority pursuant to s. NR 205.07(1)(g)2., Wis. Adm. Code. To delegate signatory authority to a duly authorized representative, please submit a Delegation of Signature Authority (DSA) form (Form 3400-220).

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Name	Title	
Bradley Keseluk	Owner	
Authorized Representative Signature	Date Signed 8/3//8	
Submitter Name (If different from Authorized	Title	
Representative)	Senior Hydrogeologist	
David Larsen		
Submitter Signature	Date Signed	
Wal lave	8/3/18	