

From: [Richard, Philip E - DNR](#)
To: [Nave, Bradley S](#); [Cary Pooler](#)
Subject: RE: Barksdale Soil Grading Plan
Date: Monday, April 26, 2021 1:53:00 PM

Brad and Carey,

After reviewing the soil grading plan/sol management plan in more detail I have the following comments/requests:

-DNR has not previously approved SS-RCLs based on recreational exposure for the site, with the exception of SS-RCLs for lead and arsenic. Therefore, soil concentrations should be compared to NR 720 soil to groundwater pathway RCLs (GW-RCLs) to determine if there is a potential for soil contamination to impact groundwater (Several NNOCs were detected at concentrations exceeding the NR 720 GW-RCLs, or the USEPA Regional Screening Levels (RSLs) for groundwater protection).

-A cap maintenance plan for the soil grading area that includes inspection, maintenance, and reporting requirements will need to be prepared.

-The Soil Grading Plan mentions the need for a vegetative cover to prevent soil erosion, yet the plan does not include any information on how the area will be seeded and maintained after the grading is complete. This can be addressed in the cap maintenance plan.

-The soil management plan will result in the need for a continuing obligation on the property as defined by s. NR 725.05 (2), therefore, the responsible party shall provide written notification to anyone meeting the criteria in s. NR 725.05 (1) at least 30 days prior to submitting the soil management plan to the department for review. Unless otherwise approved by the department, notification letters shall meet the requirements contained in s. NR 725.07. It may be possible to contact the property owner and request a waiver to the 30-day notification requirement. The property owner must receive a copy of the cap maintenance plan.

Let me know if you have any questions or would like to discuss.

Thanks,

Phil

Philip E. Richard
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From: Nave, Bradley S <Bradley.S.Nave@chemours.com>
Sent: Wednesday, March 24, 2021 8:35 PM
To: Richard, Philip E - DNR <Philip.Richard@wisconsin.gov>
Cc: Cary Pooler <cary.pooler@aecom.com>
Subject: Re: Barksdale Soil Grading Plan

Greetings Phil,

Thanks for your e-mail (attached). The site-specific RCLs (SSRCLs) were calculated using the EPA non-industrial RSL calculator. This is the same calculator WDNR uses to calculate the default RCL values that are published in Wisconsin. The only change that was made for the site-specific RCLs was that we assumed a 60-day per year exposure frequency, which reflects current and future site use as provided by the current landowner.

A request to approve SSRCLs was submitted via a request for technical assistance from WDNR in late 2008 and the WDNR file archive between October 2008 and July 2010 contains a detailed history regarding this subject. Ultimately, WDNR did not specifically approve organic SSRCLs on a site-wide basis; however, it was conceptually agreed that the 60-day per year exposure frequency was acceptable. Chemours has been updating the SSRCL values annually since 2010 to capture any new toxicological information or other updates from EPA that would affect the SSRCL values. Chemours would be happy to review the concept of WDNR approving organic SSRCLs for the Barksdale site again if you feel it would be constructive.

While the concentrations of constituents in WisDOT soil were compared to SSRCLs because it is reflective of the current and future land use where the soil will be placed, please note that the concentrations of constituents present are also below default non-industrial direct contact values. This comparison is made in the *Phase 2.5 Environmental Sampling Investigation* report that was submitted on behalf of WisDOT to WDNR in November 2018.

Thanks,

Brad

Bradley S. Nave
Principal Project Manager
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phone: 812-923-1136

From: Richard, Philip E - DNR <Philip.Richard@wisconsin.gov>

Sent: Wednesday, March 24, 2021 2:40 PM
To: Nave, Bradley S <Bradley.S.Nave@chemours.com>
Cc: Cary Pooler <cary.pooler@aecom.com>
Subject: [EXT] RE: Barksdale Soil Grading Plan

External email. Confirm links and attachments before opening.

Hi Guys,

I'm looking for information on how you calculated the site specific recreational residual contaminant levels for the site. Can you direct me to where this may have been documented in a submittal? Or any other information.

Thanks,

Phil

Philip E. Richard

Hydrogeologist
Remediation and Redevelopment Program
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phone: 715 661 0125

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e-mail: philip.richard@wisconsin.gov

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From: Nave, Bradley S <Bradley.S.Nave@chemours.com>
Sent: Friday, March 05, 2021 1:52 PM
To: Richard, Philip E - DNR <Philip.Richard@wisconsin.gov>
Cc: Cary Pooler <cary.pooler@aecom.com>; Schmidt, Eric <Eric.Schmidt@aecom.com>
Subject: Barksdale Soil Grading Plan

Greetings Phil,

Attached is an electronic copy of the soil grading plan for the material imported from the WisDOT Boyd Creek Bridge project. Per your request, a courtesy paper copy will be sent to your home address. Additionally, we will upload the document to the RR Program Submittal Portal.

Thanks,

Brad

Bradley S. Nave

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