

From: Hunt, John T - DNR
Sent: Friday, June 18, 2021 11:30 AM
To: Justin Button-Hutchens
Cc: Saari, Christopher A - DNR; Sager, John E - DNR
Subject: FedEx Materials Management Plan

Justin,

As mentioned in our phone conversation yesterday, the material management plan (MMP) was reviewed by the peer-review group. As submitted, the MMP is not approvable for technical and administrative reasons as follows:

- There are serious concerns regarding the location of the storm water pond overlying the LNAPL:
 - At last measurement there was 8' of product in MW-23, exacerbation of the contamination by surface activities should be avoided.
 - It should be recognized that in the future, BP will likely need to remediate the LNAPL in the area of the proposed storm water pond. Future remediation activities should be taken into consideration in design.
- There are several administrative and technical issues regarding the berm:
 - The MMP calls for 6" of topsoil over a geofabric as a cap over the contaminated soil berm. This is inadequate.
 - Here is a link to a guidance for design and maintenance of caps - <https://dnr.wi.gov/files/PDF/pubs/rr/RR709.pdf>.
 - The MMP indicates the cap will be vegetated, the seed mix to be used should be specified.
- The maintenance plan has several omissions:
 - The maintenance plan does not have any figures as required, especially figures that clearly indicates the exact location of the asphalt cap to be maintained.
 - The maintenance plan does not indicate the berm vegetation will be mowed.
 - An inspection log should be included in the maintenance plan.
 - It should be noted the maintenance plan will be included as an attachment to any final approval letter, therefore it needs to be a complete stand-alone document.
- Regarding the wells to be removed, the MMP indicates 3 wells to be removed, Antea indicates 5 wells are to be removed. Please clarify.
- The cross-section of the berm in figure C109 shows the berm top as being flat, the berm should be sloped to prevent precipitation ponding on the cap.

The comments above can be addressed by submitting further information or a resubmittal of an revised MMP.

If you would like to discuss these issues me and members of the peer-review group, please feel free to request a conference call.

--John

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