



June 9, 2022

CORY HART
HCI LIMITED PARTNERSHIP
2910 RIVER OAKS DRIVE
MONROE LA 71201
{electronically sent only chart@hcilp.com}

Subject: Construction Documentation Report Not Approved
FedEx Parking Lot Expansion Project
Amoco Oil Terminal Site, Winter Street, Superior, WI
DNR BRRTS Activity #(s): 02-16-000331, 07-16-563483, 07-16-583046
FID #: 816009920

Dear Mr. Hart:

On April 27, 2021, Justin Button-Hutchens of the BBJ Group submitted a Materials Management Plan (MMP) approval request to the Wisconsin Department of Natural Resources (DNR) on your behalf. The MMP request was to manage approximately 3600 cubic yards of contaminated soil associated with a parking lot expansion project. The contaminated soil was to be managed on the same site from which it will be excavated in accordance with Wis. Admin. Code § NR 718.12. The DNR received all applicable technical assistance and database fees for providing review and response, in accordance with Wis. Admin. Code § NR 749.04 (1). An approval letter was sent to you by the DNR for that MMP on August 31, 2021.

Within 60 days of completion of the project, a construction documentation report (CDR) was required to be submitted to the DNR in compliance with Wis. Admin. Code § NR 724.15. The DNR considers the management of contaminated soil in this situation to be an interim or remedial action per Wis. Admin. Code §§ NR 718.12(1) and (2). The parking lot expansion project was apparently completed in early December 2021. A CDR was submitted to the DNR on April 28, 2022, on your behalf by the BBJ Group. The CDR was reviewed by the DNR on May 19, 2022. The DNR determined the CDR was not in compliance with Wis. Admin. Code § NR 724.15 due to the following:

- As-built topographic survey or cross section plan sheets of the completed construction were not provided in the CDR. Revised maps should also be included in the inspection and maintenance plan.
- A calculated as-built volume of soil in the berm was not provided in the CDR.

The DNR requests that these items be submitted in a revised CDR within **45 days, by July 24, 2022**. The DNR will be unable to provide an approval for the CDR, and the MMP activities overall, until the requested documentation has been received.

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Cory Hart
Amoco Oil Terminal/FedEx Facility
Superior, WI

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It should be noted as part of the project, several groundwater monitoring wells were abandoned. Upon receipt of a revised CDR, the DNR will make a determination regarding well replacement and location(s).

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this approval decision, please contact John T. Hunt, by calling (715) 701-9383, or by email at john.t.hunt@wisconsin.gov.

Sincerely,

A handwritten signature in blue ink that reads "John T. Hunt". The signature is written in a cursive style with a large initial "J".

John T. Hunt P.G.
Hydrogeologist
Remediation and Redevelopment Program

cc: Justin Button-Hutchens, BBJ Group (jbutton@bbjgroup.com)
Jim L. Smith, BP Remediation Management (jim.smith2@bp.com)
Layne Kortbein, Antea (layne.kortbein@anteagroup.us)