



April 11, 2019

Wisconsin Gas LLC
Attn: Robert Paulson
333 West Everett Street
Milwaukee, WI 53203

Subject: Request for Additional Information
Request to Manage Solid Waste On-Site Under Wis. Admin. Code § NR718.12 and/or § NR 718.15
Milwaukee Solvay Coke & Gas – MGP (ALT SF), 311 E Greenfield Ave., Milwaukee WI
DNR BRRTS Activity #(s): 02-41-466662
FID #: 241219880

Dear Mr. Paulson:

The Department of Natural Resources (DNR) is in the process of reviewing the March 1, 2019 “Request to Manage Existing Soil/Material Piles” (the Request). Approximately 2,660 cubic yards of contaminated soil and 3,451 cubic yards of other solid waste (crushed concrete and brick) is proposed to be managed on the same site from which it will be excavated in accordance with Wis. Admin. Code § NR 718.12 and § NR 718.15. Additional information regarding the source of the material and how it will be reused must be provided before the DNR can approve the exemption request. In addition, the DNR is recommending limiting the reuse of certain materials to specific areas on the site to ensure that that the contamination will not pose an ongoing risk to human health or the environment.

Provide the following information to support the exemption request for reusing material from within the waste piles:

- 1) A description of where each waste pile that is proposed to be reused originated. State whether any of the waste or soil was consolidated from areas where there were known or suspected hazardous substance discharges. Are contaminant concentrations in the piles expected to be unevenly distributed because of this, or are the contaminant concentrations within each pile expected to be relatively homogenous such that the samples collected from the piles are expected to be representative?

While the DNR does typically require discrete samples to characterize material being managed under an exemption through NR 718.12 or 718.15, if contaminant concentrations within the piles are expected to be homogenous, composite sample would be considered acceptable in this case and would satisfy the requirements of NR 718.12(1)(e).

- 2) Areas where waste material will be mixed in with other material undergoing in-situ soil stabilization needs to be identified on Figure 6, Pile Material Placement Locations.
- 3) A general approximation of when the excavation and reuse or disposal of the waste piles will begin and when the management of the material is expected to be completed.

The DNR also makes the following requests regarding the storage and management of contaminated material at this site.

- 1) It is unclear whether the waste piles are being stored in compliance with the solid waste rules in Wis. Admin. Code §§ NR 502.05 (1), (4), (6), (8), and (9). The DNR reminds you that contaminated soil and other solid waste material must be stored following the applicable portions of Wis. Admin. Code § NR 502.05 unless the site is exempt from these rules. The storage of approximately 7,200 cubic yards of waste at the site would not be eligible for an exemption through Wis. Admin. Code §§ NR 502.05(3)(j) or NR 718.05. The DNR understands that efforts are being made to remove the soil piles by reusing the material on site and by landfill disposal. If the waste is not being stored in compliance with the solid waste rules, the DNR would request that the material be managed without delay to get the site into compliance. Furthermore, unless management of the material is imminent, the piles should be covered to prevent spreading of the contamination through wind or runoff.
- 2) Samples collected from the pile of brick fines and soil pile 59 identified naphthalene at concentrations greater than 5 mg/kg. Naphthalene at this concentration may pose a vapor intrusion risk to buildings or other potential receptors located within 30 feet of the material. To ensure that this material will not pose a vapor risk in the future, material from these piles must not be reused in locations of the site that are within 30 feet of a potential receptor. The material must be reused in a clearly defined location (such as the Brick Fines Placement Area depicted on Figure 6) so that the risk this contamination poses for the development of this property can be considered. The Request must be updated to identify where this material will be managed and confirm that reusing this material in these locations will comply with Wis. Admin. Code § NR 718.12(2)(b)8 and not cause a vapor action level in indoor air to be attained or exceeded.
- 3) The results of leach testing conducted on samples from the pile of concrete fines, soil pile 39 and soil pile 59, suggests that hazardous substances present in the waste may later impact groundwater. This material may be used within the in-situ soil stabilization area to address this risk. Other locations may be considered if an impermeable cap will be placed over the material after it is reused, and there is adequate separation between the material and the high groundwater level. The Request must be updated to identify where this material will be managed and confirm that reusing this material in these locations will comply with Wis. Admin. Code § NR 718.12(2)(b)8 and not cause a violation of a Wis. Admin. Code ch. NR 140 groundwater quality enforcement standard.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this request, please contact me by calling (608) 266-0941, or by email at paul.grittner@wisconsin.gov. General questions regarding this site can be addressed to Margaret Brunette, the DNR Project Manager, by calling (414) 263-8557, or by email at margaret.brunette@wisconsin.gov.

Sincerely,



Paul Grittner
Contaminated Materials Management Specialist
Remediation & Redevelopment Program

cc: Jay Karls, O'Brien & Gere Engineering Inc. (OBG), 234 W. Florida Street, Fifth Floor, Milwaukee, WI 53204