



State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection

Ben Brancel, Secretary

May 2, 2014

Paul VanHenkelum
Kapur & Associates
7711 N Port Washington Rd
Milwaukee, WI 53217

DATCP Case #95-414-0524-99
DNR BRRTS No. 02-65-547256

Re: Approval of *Soil Management Plan*
Former Cooperative Plus Fertilizer Plant, 311 W Centralia Street, Elkhorn, Wisconsin

Dear Mr. VanHenkelum:

This letter responds to the submission of the April 14, 2014 *Soil Management Plan* (SMP) for the former Cooperative Plus site, which is currently being developed for Great Lakes Components, LLC (GLC), in Elkhorn, Wisconsin. The SMP proposes a method for managing soil which will be excavated from the GLC property during the course of developing the property. According to the SMP, soil excavated from the GLC property is to be deposited in a landscaped berm on an adjacent property currently owned by the City of Elkhorn. The Departments of Agriculture, Trade and Consumer Protection (DATCP) and Natural Resources (DNR) reviewed the SMP, which was submitted by Kapur & Associates (Kapur), in conjunction with supplemental information received through subsequent communication with Kapur. Based on DATCP's review of the SMP and supplemental information, DATCP approves the SMP with the following conditions and clarifications:

- With respect to the so-called closure sampling on the GLC property to document post-excavation in-situ soil conditions, DATCP requires collection of one soil sample for each 20 lineal ft of excavation sidewall, or one sample per 400 sq ft of excavation base. In the absence of an alternative proposal from Kapur, we anticipate adherence to this requirement;
- Although DATCP generally references 1 part per million (ppm) total pesticides as a cleanup goal, we require laboratory reporting of individual pesticides on our standard analyte list. If necessary, direct contact evaluations are based on individual contaminants of concern;
- Depending on contaminant concentrations detected in soil left in place on the GLC property, a cap maintenance plan or other post-closure continuing obligations may be required as part of the case closure process;

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- According to the SMP, Kapur will collect and analyze samples of soil removed during the excavation in order to characterize soil that will be placed in the berm. Further sampling is planned following emplacement of soil in the berm to confirm the contaminant concentration distribution within the berm. Because DNR has the authority to close the site receiving the contaminated soil, Kapur is encouraged to work directly with DNR concerning conditions they may place on approval for the berm;
- If any soil within the berm exceeds direct contact concentrations, DNR may require an engineered barrier or other enhanced capping measures for the berm. Again, Kapur is encouraged to work directly with DNR on issues associated with the berm.

DATCP recommends that you secure approval for soil disposal from a licensed landfill, in advance of the work. Selective landfilling of soil could potentially allow mitigation of expensive or maintenance-intensive capping requirements should isolated detections of highly contaminated soil be encountered.

Please contact me at trevor.bannister@wisconsin.gov or 608-224-4514 if you have any questions regarding this approval or other aspects of the case.

Sincerely,



Trevor Bannister
Hydrogeologist

cc: Scott Dalberg, GLC
Jeff Saatkamp, DATCP (via electronic mail)
Mark Drews, DNR (via electronic mail)
Sam Tapson, City of Elkhorn