

**From:** Adam Tegen <ategen@manitowoc.org>  
**Sent:** Tuesday, October 20, 2020 1:56 PM  
**To:** Beggs, Tauren R - DNR  
**Cc:** Kathleen McDaniel; Byers, Harris  
**Subject:** RE: River Point District (CN Peninsula)

Good afternoon Tauren,

As always I appreciate the quick and thorough response to my questions. The extra clarification surrounding Area B2 and the former turntable and roundhouse structures was particularly helpful.

We will proceed accordingly.

Sincerely,



Adam Tegen  
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**From:** Beggs, Tauren R - DNR [<mailto:Tauren.Beggs@wisconsin.gov>]  
**Sent:** Monday, October 19, 2020 4:04 PM  
**To:** Adam Tegen  
**Cc:** Kathleen McDaniel; Byers, Harris  
**Subject:** RE: River Point District (CN Peninsula)

Hi Adam,

For both areas (referenced as Area B2 and Site 3 in your email) which have residual soil contamination continuing obligations:

As long as you don't plan to move contaminated soil around on-site or off-site (at a location other than an approved landfill) during clearing and grubbing activities, the DNR doesn't normally consider just clearing and grubbing as a significant enough concern to warrant a soil management plan needing pre-approval under Wis. Admin. Code ch. NR 718. Any contaminated soil you do encounter while clearing and grubbing must be properly managed; you should minimize this as much as possible and leave the contaminated soil in the same location from where it was generated.

For the area (referenced as B2), associated with the closed case WCL – Turntable Former Roundhouse, BRRTS # 02-36-176478, continuing obligation for cap maintenance:

Based on the current site-specific conditions and the new soil data collected across the entire site, there are PAHs and metals with similar concentrations completely surrounding this area (and other contaminants) that will also need capping to make the site protective for the overall redevelopment. The DNR will allow the City to work in the cap area and to remove the former turntable and roundhouse structures for clearing and grubbing purposes at this time. Once the redevelopment and new cap in this area is proposed, a formal post closure modification request will need to be submitted to the DNR for approval, so the changes to the cap are documented and to show the cap is protective for the new land use.

Regards,

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**Tauren R. Beggs**

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**From:** Adam Tegen <[ategen@manitowoc.org](mailto:ategen@manitowoc.org)>

**Sent:** Friday, October 16, 2020 1:16 PM

**To:** Beggs, Tauren R - DNR <[Tauren.Beggs@wisconsin.gov](mailto:Tauren.Beggs@wisconsin.gov)>

**Cc:** Kathleen McDaniel <[kmcdaniel@manitowoc.org](mailto:kmcdaniel@manitowoc.org)>; Byers, Harris <[Harris.Byers@stantec.com](mailto:Harris.Byers@stantec.com)>

**Subject:** River Point District (CN Peninsula)

Good afternoon Tauren,

In an attempt to ensure you are kept up to speed on any potential changes at the River Point District, I wanted to let you know that we are working with Vinton Construction to begin clearing and grubbing the vegetation. It is my understanding that two particular locations on the peninsula are of particular concern.

The area referenced as Area B2 was previously closed with an engineered barrier in place. Before moving forward, I wanted to verify that the WDNR is supportive of a temporary modification of that cap through the clearing/grubbing of vegetation. At this time it is expected that the former RR infrastructure (e.g. concrete/wood on the turntable) would be left in place; however, if it makes removal of the vegetation easier, there is the possibility of that being impacted as well. The contractor is aware that any disturbance of the soil will be repaired and signage replaced, including the possibility of Vinton thin-spreading a thin horizon of fill across the area to act as a temporary engineered barrier after they finish grubbing.

For the area known as Site 3, it was closed without a cap maintenance restriction. However, I would like to confirm that the WDNR is agreeable with grubbing/clearing that location as well. We are also working with Vinton to ensure they are aware of the recent potential MGP residues in the area so they will keep a keen eye out for any soil that turns blue when exposed to air. Since the delineation of the extent of MGP residues have not been completed, there is always the potential more exists onsite.

I am happy to have a call with you to clarify any questions you may have. Thanks for taking the time to assist me with this question.

Sincerely,



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