Stantec Consulting Services Inc.
12075 Corporate Parkway Suite 200, Mequon WI 53092-2649

January 31, 2022

Attention: Tauren Beggs
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Ave
Green Bay, WI 54313

Dear Mr. Beggs,

Reference: Evaluation of Importing Crushed Excess Basic Structural Concrete As Fill
Non-VPLE Areas of the River Point District
Manitowoc, Wisconsin
BRRTS ID: 07-36-583000 (LGU Exemption/ General Property)
Stantec Project #: 193708427

In following up to our email correspondence, on behalf of the City of Manitowoc (City), Stantec Consulting Services, Inc. (Stantec) has prepared this letter to request your concurrence on the use of imported crushed basic structural concrete as fill in Non-Voluntary Party Liability Exemption (VPLE) areas of the River Point District brownfield redevelopment project (herein referred to as the "Property"). The location of the Property relative to local topography is illustrated on Figure 1. The location of the Property relative to identifiable features on a 2020 orthophotograph is illustrated on Figure 2.

Please note, as required by the purchase agreement with the previous owner, redevelopment of two areas (defined as Parcel B1 and Parcel B2) for non-industrial reuse must be completed under the oversight of the Wisconsin Department of Natural Resources (WDNR) Voluntary Party Liability Exemption (VPLE) program. The locations of Parcel B1 and Parcel B2 are illustrated on Figures 1-3; please note that these two areas are omitted from this letter. A future request for placing this material in Area B1 and B2 will be made to the committee once the areas are enrolled in the VPLE program.

BACKGROUND

The Community Development Authority of the City of Manitowoc (CDA) acquired the Property on April 12, 2019 for the purpose of blight elimination and subsequently received a Local Government Unit (LGU) Environmental Liability Exemption from WDNR on March 18, 2019 with a BRRTS activity number of 07-36-583000.

Subsequent subsurface investigations identified a sitewide fill unit consisting of black granular materials rich in heavy metals and polycyclic aromatic hydrocarbons (PAH; e.g., Stantec, 2020 and 2021). The fill unit is estimated to be approximately 105,000 cubic yards in volume and ranging in thickness up to 8 feet (Figure 2). Further, the Property is targeted for non-industrial reuse and initial estimates indicate upwards of 150,000 cubic yards of fill needs to be imported to raise the grade of the Site to match the surrounding street grid. As such, Stantec (2020) proposed leaving the black granular material in place and using future imported clean fill to construct a sitewide engineered barrier suitable for mitigating risks posed by residual subsurface impacts.

The City has identified a potential source of material suitable for use as sitewide fill at the Property. Stantec understands the fill consists of partially crushed excess basic structural concrete manufactured by Spancrete, Inc. and stockpiled at a nearby offsite location. Critically, we understand this concrete consists of excess castings and is NOT construction/demolition (C&D) debris. A safety data sheet (SDS) for this material is provided in Attachment A. Please note, if needed, material processing (e.g. crushing/removal of reinforcing steel) will be conducted offsite at a properly permitted crushing plant capable of controlling dust emissions during the crushing/sorting process.

MATERIAL EVALUATION

Components. As noted on the SDS, the target concrete includes Portland cement, calcium oxide, and crystalline quartz silica. Once the concrete is cured, these constituents are bound into the concrete matrix; therefore, if the target concrete is used as fill, the identified constituents are not considered a risk to the subsurface and are not anticipated to exacerbate the fate/transport of existing soil impacts.

pH. The curing process is known to lower the pH of raw concrete from >12 to approximately 8.3 when fully cured. Therefore, use of the target concrete as fill is not anticipated to alter the pH of the vadose, and as such, is not anticipated to exacerbate the fate/transport of existing soil impacts.

Potential for Impacts. As noted previously, we understand the target concrete consists of excess castings and is NOT C&D debris and therefore does not contain constituents common in cementitious C&D wastes (e.g., petroleum residues, lead-bearing paint, etc.).

CONCLUSION

Given the evaluation provided herein, sampling the target concrete prior to importing and placement of the material in the non-VPLE portions of the Property does not appear to be warranted.

FUTURE ACTIONS AND REPORTING

The final placement/compaction of the fill will be documented in future remedial construction documentation reports. The placed material may be further capped based on the final non-industrial reuse of target areas. Depending on the intended reuse, final cap materials may include hardscape (e.g., asphalt, concrete building slabs) and landscaped areas (e.g., decorative stone, topsoil/grass, trees/shrubs). As suggested by Stantec (2020), the total thickness of the sitewide engineered barrier will be no less than 24 inches.

Stantec and the City requests a written response from the WDNR concurring the target concrete is suitable for use at the Property as clean fill to rough-grade the non-VPLE portions of the Property.

Regards,

STANTEC CONSULTING SERVICES INC

Harris L. Byers, Ph.D.
Sr. Brownfields Project Manager
Email: Harris.Byers@Stantec.com

STANTEC CONSULTING SERVICES INC.

Richard J. Binder, P.G., CPG
QA/QC Manager
Rick.Binder@stantec.com

Attachments:
Figures
Attachment A – SDS Sheet

SELECT REFERENCES

Stantec, 2019, 10th Street Railroad Property, Manitowoc, Wisconsin, Phase I Environmental Site Assessment, March 21, 2019.

Stantec, 2020, Phase II Environmental Site Assessment, Riverpoint District; Manitowoc, Wisconsin, March 23, 2020.

Stantec, 2021, NR716 Site Investigation Report, River Point District Phase 1 Construction Area; Manitowoc, Wisconsin, July 19, 2021.

FIGURES

Figure No.
1

Title
Project Area and Local Topography

Client/Project
River Point District
City of Manitowoc

Prepared by HLB on 1/24/2022

0 390 780
Feet

N

Legend

- River Point District
- VPLE Project Areas

Notes
1. Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
2. Orthophotograph: Manitowoc County, 2020

Stantec

Figure No.
2

Title
Project Area and 2020 Orthophotograph

Client/Project
River Point District
City of Manitowoc

Prepared by HLB on 1/24/2022

0 130 260
Feet

N

Legend

- River Point District
- VPLE Project Areas

Notes
1. Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
2. Orthophotograph: Manitowoc County, 2020

Stantec

Figure No.
3

Title
Extent and Thickness of Granular Fill Unit

Client/Project
River Point District
City of Manitowoc

Prepared by HLB on 1/24/2022

0 130 260
Feet

N

Legend

- River Point District
- VPLE Project

Thickness of Granular Fill

(Feet)

- 7 - 8
- 6 - 7
- 5 - 6
- 4 - 5
- 3 - 4
- 2 - 3
- 1 - 2
- 0 - 1

Notes
1. Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
2. Orthophotograph: Manitowoc County, 2020

Stantec

ATTACHMENT A
SAFETY DATA SHEET

Basic Structural Mix

Safety Data Sheet

Prepared according to Federal Register / Vol. 77, No. 58 / Monday, March 26, 2012 / Rules and Regulations

Date of Issue: 06/27/2016

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Trade name : Basic Structural Mix

Product form : Mixture

1.2. Relevant identified uses of the substance or mixture and uses advised against

1.3. Details of the supplier of the safety data sheet

Spancrete
N16 W23415 Stoneridge Drive
53188 Waukesha
Telephone: 414.290.9000, para Español: 855.900.SPAN

1.4. Emergency telephone number

No additional information available

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

GHS-US classification

Skin Irrit. 2 H315
Eye Dam. 1 H318
Carc. 1A H350
STOT SE 3 H335
STOT RE 1 H372

2.2. Label elements

GHS-US labeling

Hazard pictograms (GHS-US) :

GHS05 GHS07 GHS08

Signal word (GHS-US) : **Danger**

Hazard statements (GHS-US) :
H315 - Causes skin irritation
H318 - Causes serious eye damage
H335 - May cause respiratory irritation
H350 - May cause cancer
H372 - Causes damage to organs through prolonged or repeated exposure

Precautionary statements (GHS-US) :
P201 - Obtain special instructions before use
P202 - Do not handle until all safety precautions have been read and understood
P260 - Do not breathe dust, fume, gas
P264 - Wash hands, forearms and face thoroughly after handling
P270 - Do not eat, drink or smoke when using this product
P271 - Use only outdoors or in a well-ventilated area
P280 - Wear eye protection, face shield, protective gloves, protective clothing
P302+P352 - If on skin: Wash with plenty of soap and water
P304+P340 - If inhaled: Remove person to fresh air and keep comfortable for breathing
P305+P351+P338 - IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
P308+P313 - If exposed or concerned: Get medical advice/attention
P310 - Immediately call a doctor
P312 - Call a POISON CENTER, a doctor if you feel unwell
P314 - Get medical advice/attention if you feel unwell
P321 - Specific treatment (see first aid instructions on this label)
P332+P313 - If skin irritation occurs: Get medical advice/attention
P362+P364 - Take off contaminated clothing and wash it before reuse
P403+P233 - Store in a well-ventilated place. Keep container tightly closed
P405 - Store locked up
P501 - Dispose of contents/container to a licensed hazardous-waste disposal contractor or collection site except for empty clean containers which can be disposed of as non-hazardous waste

2.3. Other hazards

No additional information available

2.4. Unknown acute toxicity (GHS US)

No data available

SECTION 3: Composition/Information on ingredients

3.1. Substance

Not applicable

3.2. Mixture

Name	Product identifier	%
Cement, portland, chemicals	(CAS No) 65997-15-1	10 - 30*
Calcium oxide	(CAS No) 1305-78-8	0.5 - 1.5*
Silica: Crystalline, quartz	(CAS No) 14808-60-7	0.1 - 1*

*In accordance with paragraph (i) of the OSHA Hazard Communication Standard (29 CFR §1910.1200), the specific chemical identity or exact weight % has been withheld as a trade secret

SECTION 4: First aid measures

4.1. Description of first aid measures

First-aid measures general : If exposed or concerned, get medical attention/advice. Show this safety data sheet to the doctor in attendance. Wash contaminated clothing before re-use. Never give anything to an unconscious person.

First-aid measures after inhalation : IF INHALED: Remove to fresh air and keep at rest in a position comfortable for breathing. Get medical attention if breathing is affected. If breathing is difficult, supply oxygen.

First-aid measures after skin contact : IF ON SKIN (or clothing): Remove affected clothing and wash all exposed skin with water for at least 15 minutes. If irritation develops or persists, get medical attention immediately.

First-aid measures after eye contact : IF IN EYES: Immediately flush with plenty of water for at least 15 minutes. Remove contact lenses if present and easy to do so. Get medical attention immediately. Continue rinsing.

First-aid measures after ingestion : IF SWALLOWED: rinse mouth thoroughly. Do not induce vomiting without advice from poison control center or medical professional. Get medical attention immediately.

4.2. Most important symptoms and effects, both acute and delayed

Symptoms/injuries : Causes serious eye damage. May cause cancer. Causes skin irritation. May cause respiratory irritation. Causes damage to organs through prolonged or repeated exposure. Harmful if swallowed.

Symptoms/injuries after inhalation : May cause respiratory irritation.

Symptoms/injuries after skin contact : May cause skin irritation.

Symptoms/injuries after eye contact : Causes severe eye damage.

Symptoms/injuries after ingestion : Harmful if swallowed.

Chronic symptoms : Causes damage to organs through prolonged or repeated exposure. May cause cancer.

4.3. Indication of any immediate medical attention and special treatment needed

No additional information available

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media : Dry chemical. Foam. carbon dioxide (CO2).

5.2. Special hazards arising from the substance or mixture

Fire hazard : The product is not flammable.

Reactivity : No dangerous reactions known under normal conditions of use.

5.3. Advice for firefighters

Firefighting instructions : Fight fires from a safe distance or protected areas. Fire hoses with fog nozzles may be used for controlling fires but care must be exercised not to spread flaming.

Protection during firefighting : Wear self-contained breathing apparatus and protective suit (see item 8).

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

General measures : Evacuate area. Keep upwind. Ventilate area. Spill should be handled by trained clean-up crews properly equipped with respiratory equipment and full chemical protective gear (see Section 8).

6.1.1. For non-emergency personnel

Protective equipment : Wear Protective equipment as described in Section 8.

Emergency procedures : Evacuate unnecessary personnel.

6.1.2. For emergency responders

Protective equipment : Wear suitable protective clothing, gloves and eye or face protection. For further information refer to section 8: "Exposure controls/personal protection".

6.2. Environmental precautions

No additional information available

6.3. Methods and material for containment and cleaning up

For containment : Sweep or shovel spills into appropriate container for disposal.

Methods for cleaning up : Sweep or shovel spills into appropriate container for disposal. This material and its container must be disposed of in a safe way, and as per local legislation.

Other information : Remove any flammable materials from the surrounding area.

6.4. Reference to other sections

No additional information available

SECTION 7: Handling and storage

7.1. Precautions for safe handling

Precautions for safe handling : Wear appropriate protective clothing as described in Secton 8 during handling activities. Use only in well-ventilated areas.

7.2. Conditions for safe storage, including any incompatibilities

Storage conditions : Store in a dry place.

Packaging materials : Do not store in metal container.

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

Silica: Crystalline, quartz (14808-60-7)	
ACGIH TWA (mg/m³)	0.025 mg/m³ (respirable fraction)
OSHA PEL (TWA) (mg/m³)	(30)/(%SiO2 + 2) total dust; (10)/(%SiO2 + 2) respirable fraction
OSHA PEL (TWA) (ppm)	(250)/(%SiO2 + 5) respirable fraction

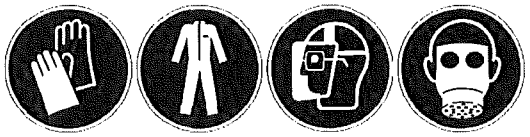
Cement, portland, chemicals (65997-15-1)	
ACGIH TWA (mg/m³)	1 mg/m³
OSHA PEL (TWA) (mg/m³)	10 (total dust) 5 (respirable fraction)

Calcium oxide (1305-78-8)	
ACGIH TWA (mg/m³)	2 mg/m³
Remark (ACGIH)	Upper Respiratory Tract irritation
OSHA PEL (TWA) (mg/m³)	5 mg/m³

8.2. Exposure controls

Appropriate engineering controls : Provide adequate general and local exhaust ventilation. Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits. Use explosion-proof equipment with flammable materials. Ensure adequate ventilation, especially in confined areas.

Personal protective equipment : Gloves. Protective clothing. Wear chemical goggles and face shield in combination. Insufficient ventilation: wear respiratory protection.



Hand protection : Use gloves chemically resistant to this material when prolonged or repeated contact could occur. Gloves should be classified under Standard EN 374 or ASTM F1296. Suggested glove materials are: Neoprene, Nitrile/butadiene rubber, Polyethylene, Ethyl vinyl alcohol laminate, PVC or vinyl. Suitable gloves for this specific application can be recommended by the glove supplier.

Eye protection : Wear eye protection, including chemical splash goggles and a face shield when possibility exists for eye contact due to spraying liquid or airborne particles.

Skin and body protection : Wear long sleeves, and chemically impervious PPE/coveralls to minimize bodily exposure.

Respiratory protection : Chemical-cartridge respirators with an organic vapor cartridge or airline respirators.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

Physical state : Solid

Color : No data available

Odor : No data available

Odor Threshold : No data available

pH : No data available

Relative evaporation rate (butyl acetate=1)	: No data available
Melting point	: No data available
Freezing point	: No data available
Boiling point	: No data available
Flash point	: No data available
Auto-ignition temperature	: No data available
Decomposition temperature	: No data available
Flammability (solid, gas)	: No data available
Vapor pressure	: No data available
Relative vapor density at 20 °C	: No data available
Relative density	: No data available
Solubility	: Water: Insoluble in water
Log Pow	: No data available
Log Kow	: No data available
Viscosity, kinematic	: No data available
Viscosity, dynamic	: No data available
Explosive properties	: No data available
Oxidizing properties	: No data available
Explosion limits	: No data available

9.2. Other information

No additional information available

SECTION 10: Stability and reactivity

10.1. Reactivity

No dangerous reactions known under normal conditions of use.

10.2. Chemical stability

Stable under recommended handling and storage conditions (see section 7).

10.3. Possibility of hazardous reactions

None known.

10.4. Conditions to avoid

None under normal use.

10.5. Incompatible materials

No data available.

10.6. Hazardous decomposition products

No data available.

SECTION 11: Toxicological information

11.1. Information on toxicological effects

Acute toxicity	: Not classified
Skin corrosion/irritation	: Causes skin irritation.
Serious eye damage/irritation	: Causes serious eye damage.
Respiratory or skin sensitization	: Not classified
Germ cell mutagenicity	: Not classified
Carcinogenicity	: May cause cancer.

Silica: Crystalline, quartz (14808-60-7)	
IARC group	1 - Carcinogenic to humans

Reproductive toxicity	: Not classified
Specific target organ toxicity (single exposure)	: May cause respiratory irritation.
Specific target organ toxicity (repeated exposure)	: Causes damage to organs through prolonged or repeated exposure.
Aspiration hazard	: Not classified
Symptoms/injuries after inhalation	: May cause respiratory irritation.
Symptoms/injuries after skin contact	: May cause skin irritation.
Symptoms/injuries after eye contact	: Causes severe eye damage.

Symptoms/injuries after ingestion : May cause gastrointestinal irritation

Chronic symptoms : Causes damage to organs through prolonged or repeated exposure. May cause cancer.

SECTION 12: Ecological information

12.1. Toxicity

Ecology - general : No data available.

12.2. Persistence and degradability

No additional information available

12.3. Bioaccumulative potential

No additional information available

12.4. Mobility in soil

No additional information available

12.5. Other adverse effects

No additional information available

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Waste treatment methods : Do not discharge to public wastewater systems without permit of pollution control authorities. No discharge to surface waters is allowed without an NPDES permit.

Waste disposal recommendations : Dispose in a safe manner in accordance with local/national regulations. Do not allow the product to be released into the environment.

SECTION 14: Transport information

In accordance with DOT

Not hazardous for transport

Additional information

Other information : No supplementary information available.

Transport by sea

No additional information available

Air transport

No additional information available

SECTION 15: Regulatory information

15.1. US Federal regulations

Basic Structural Mix	
All chemical substances in this product are listed in the EPA (Environment Protection Agency) TSCA (Toxic Substances Control Act) Inventory or are exempt	
SARA Section 311/312 Hazard Classes	Immediate (acute) health hazard Delayed (chronic) health hazard

15.2. International regulations

No additional information available.

15.3. US State regulations

This product contains, or may contain, trace quantities of a substance(s) known to the state of California to cause cancer and/or reproductive toxicity

Silica: Crystalline, quartz (14808-60-7)				
U.S. - California - Proposition 65 - Carcinogens List	U.S. - California - Proposition 65 - Developmental Toxicity	U.S. - California - Proposition 65 - Reproductive Toxicity - Female	U.S. - California - Proposition 65 - Reproductive Toxicity - Male	Non-significant risk level (NSRL)
Yes	No	No	No	NA

Acetaldehyde (75-07-0)				
U.S. - California - Proposition 65 - Carcinogens List	U.S. - California - Proposition 65 - Developmental Toxicity	U.S. - California - Proposition 65 - Reproductive Toxicity - Female	U.S. - California - Proposition 65 - Reproductive Toxicity - Male	Non-significant risk level (NSRL)
Yes	No	No	No	90 (inhalation) µg/day

Diethanolamine (111-42-2)				
U.S. - California - Proposition 65 - Carcinogens List	U.S. - California - Proposition 65 - Developmental Toxicity	U.S. - California - Proposition 65 - Reproductive Toxicity - Female	U.S. - California - Proposition 65 - Reproductive Toxicity - Male	Non-significant risk level (NSRL)
Yes	No	No	No	

Silica: Crystalline, quartz (14808-60-7)

U.S. - New Jersey - Right to Know Hazardous Substance List
U.S. - Pennsylvania - RTK (Right to Know) List
U.S. - Massachusetts - Right To Know List

Cement, portland, chemicals (65997-15-1)

U.S. - New Jersey - Right to Know Hazardous Substance List
U.S. - Massachusetts - Right To Know List
U.S. - Pennsylvania - RTK (Right to Know) List

Calcium oxide (1305-78-8)

U.S. - New Jersey - Right to Know Hazardous Substance List
U.S. - Massachusetts - Right To Know List
U.S. - Pennsylvania - RTK (Right to Know) List

Acetaldehyde (75-07-0)

U.S. - Massachusetts - Right To Know List
U.S. - New Jersey - Right to Know Hazardous Substance List
U.S. - Pennsylvania - RTK (Right to Know) List

Calcium nitrate (10124-37-5)

U.S. - New Jersey - Right to Know Hazardous Substance List

Limestone (1317-65-3)

U.S. - New Jersey - Right to Know Hazardous Substance List
U.S. - Massachusetts - Right To Know List
U.S. - Pennsylvania - RTK (Right to Know) List

SECTION 16: Other information

Indication of changes : Revision 1.0: New SDS Created.

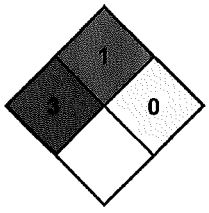
Date of Issue : 6/27/2016

Other information : Author: LMG.

NFPA health hazard : 3 - Short exposure could cause serious temporary or residual injury even though prompt medical attention was given.

NFPA fire hazard : 1 - Must be preheated before ignition can occur.

NFPA reactivity : 0 - Normally stable, even under fire exposure conditions, and are not reactive with water.



HMIS III Rating

Health : 3*

Flammability : 1

Physical : 1

Personal protection :

This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should not therefore be construed as guaranteeing any specific property of the product.

From: Byers, Harris <Harris.Byers@stantec.com>
Sent: Wednesday, February 2, 2022 12:15 PM
To: Beggs, Tauren R - DNR
Cc: Adam Tegen
Subject: RE: Reuse of Concrete for Fill for River Point
Attachments: River Point District - Concrete Fill Evaluation.pdf

Tauren:

On behalf of the City of Manitowoc, and as a continuance of this discussion, we have evaluated the potential fill material and summarized our review in the attached letter.

Please review at your earliest convenience and let us know if you concur with out conclusions.

Sincerely,

Harris Byers, Ph.D.
Sr. Brownfields Project Manager
Contaminant Hydrogeologist / Urban Geochemist

Direct: 414 581-6476
Harris.Byers@stantec.com

Stantec
12075 Corporate Parkway Suite 200
Mequon WI 53092-2649

From: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>
Sent: Friday, January 14, 2022 8:04 AM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Adam Tegen <ategen@manitowoc.org>
Subject: RE: Reuse of Concrete for Fill for River Point

Good morning Harris,

The DNR concurs with the potential use of this material. I would agree that a low hazard exemption request is not appropriate for this, so you can submit a report/request to me to provide further details on the concrete, locations (VPLE/non-VPLE areas) where you think you will be proposing to use it on the River Point site, and justifications of whether you think it should be sampled or not. If you want a written response from the DNR, then you can submit it as a technical assistance request with $700 fee.

Not sure when the City is planning to apply for VPLE for the one parcel, but we review quite a few of these kinds of imported material requests for VPLE sites, so it is fairly common that we see requests for proposing to import soil or other materials to a site. When reviews are completed for a site that is currently in VPLE, the DNR would just charge the hourly VPLE rate for review of the submittal.

If you have any questions, please let me know.

Regards,

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Tauren R. Beggs
Phone: (920) 510-3472
Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

From: Beggs, Tauren R - DNR
Sent: Monday, January 10, 2022 11:54 AM
To: Byers, Harris <Harris.Byers@stantec.com>
Cc: Adam Tegen <ategen@manitowoc.org>
Subject: RE: Reuse of Concrete for Fill for River Point

Hi Harris,

I will talk to Roxanne and once I have an answer for you, I will get back to you.

Regards,

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Tauren R. Beggs
Phone: (920) 510-3472
Tauren.Beggs@wisconsin.gov (preferred contact method during work at home)

From: Byers, Harris <Harris.Byers@stantec.com>
Sent: Monday, January 10, 2022 9:45 AM
To: Beggs, Tauren R - DNR <Tauren.Beggs@wisconsin.gov>; Adam Tegen <ategen@manitowoc.org>
Subject: Reuse of Concrete for Fill for River Point

Tauren:

Good morning. The City of Manitowoc was approached by Spancrete (mfr of precast concrete products) to see if the City was interested in using the scrap castings/crushed concrete as fill at River Point. I understand this concrete is untreated excess material (i.e. NOT painted or ever used in construction) that is stockpiled at the Spancrete yard. For example, if a customer canceled an order or perhaps the final product did not meet spec, was extra, etc.

I am writing to find out if WDNR has a review/approval process for importing/placing this scrap concrete as granular fill at River Point. For example, since the concrete is not painted, I am guessing Form 4400-274 (low-haz exemption) is not the way to go. Also I wanted to see if you had any initial thoughts on concrete sampling/characterization you think WDNR (including VPLE) would want of this concrete prior to moving onto River Point.

This fill material would represent a monumental cost savings to the City (vs. the city purchasing fill from a quarry), so I am hopeful we can find a way to make this work.

Sincerely,

Harris Byers, Ph.D.
Sr. Brownfields Project Manager
Contaminant Hydrogeologist / Urban Geochemist

Direct: 414 581-6476
Harris.Byers@stantec.com

Stantec
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Mequon WI 53092-2649