



April 27, 2022
File: 193707141

Attention: Joseph Graham
Contaminated Sediments Specialist
Wisconsin Department of Natural Resources
810 West Maple Street
Spooner, Wisconsin 54802-1255

**Reference: Workplan for Additional Soil Investigation, C. Reiss Coal Dock Property
Superior, Wisconsin
WDNR BRRTS # Pending**

Dear Mr. Graham:

On February 16, 2022, Stantec Consulting Services Inc. (Stantec) submitted a *Notification for Hazardous Substance Discharge (Form 4400-225)* to the Wisconsin Department of Natural Resources (WDNR) documenting select polycyclic aromatic hydrocarbon (PAH) and Resource Conservation and Recovery Act (RCRA) metal contamination in soil during a Limited Soil Investigation performed in December 2021 at the C. Reiss Coal Company, LLC (C. Reiss) Coal Dock property in Superior, Wisconsin (the Property). The WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) number for this case is pending.

Additional soil sampling at the Property is warranted to evaluate the magnitude and extent of identified contamination and document soil quality ahead of proposed development activities at the Property. Therefore, Stantec is providing this workplan for additional environmental sampling to assess soil impacts at the Property.

SITE BACKGROUND

The Property is located along the north-adjointing St. Louis River, and consists of a vacant, former industrial dock parcel (PIN 048040101400) currently owned by C. Reiss. Former dock operations included petroleum product and open-air coal storage and transloading, and coal briquet manufacturing from the late 19th Century through the late 20th Century. Soil contamination resulting from past petroleum release(s) and the presence of industrial fill in surficial soils is documented at an existing, open BRRTS case on the Property (03-16-000320 MURPHY MARINE TERMINAL), with multiple BRRTS cases present at the east-adjointing property that have been documented as impacting soil and/or groundwater at the Property. These include:

- 02-16-297977 AMOCO OIL BARGE DOCK - FMR BARGE DOCK (closed),
- 02-16-297979 AMOCO BARGE DOCK - OW SEPARATOR & LOAD RACK (open), and
- 02-16-117873 AMOCO BARGE DOCK - MANIFOLD & AST AREA (open).

Redevelopment of the Property for continued dock use consistent with historical operations is planned for Autumn 2022 and will include the installation of new railroad spur, access road, and site-wide grading.

On December 9, 2021, Stantec performed a limited soil investigation at the Property to evaluate soil quality in the area of a future onsite stormwater retention pond. The results of the soil sampling were shared with the WDNR during a teleconference on January 20, 2022 and indicated that fill materials present in shallow soils (zero to three feet below grade) contained RCRA metal and PAH constituents at concentrations above Chapter NR 720 Wisconsin Administrative Code (WAC) residual contaminant levels (RCLs). WDNR requested that Stantec prepare a formal Notification for Hazardous Substance Discharge (Form 4400-225), which was subsequently submitted to WDNR by Stantec on February 16, 2022 and documented in the Stantec report entitled *Summary of Limited Soil Investigation*. The BRRTS number for this case is pending.

Based on a review of historical case files associated with the Property and soil sampling results from recently completed soil sampling activities, identified contamination appears to be associated with the

presence of historical fill observed in surficial soils across much of the Property. Therefore, additional investigation is proposed to further evaluate the lateral and vertical extent and environmental quality of identified fill and the environmental quality of underlying clay soils. The results of these activities will be used to develop a materials management plan related to upcoming Property redevelopment and, ultimately, obtain case closure. Based on the nature of contamination and depth of groundwater at the Property, further assessment of groundwater is not planned at this time.

PROPOSED SCOPE OF WORK

Proposed soil sampling activities are scheduled to occur in early May 2022. Stantec will subcontract the services of a qualified drilling firm to advance up to 20 soil borings using direct-push dual-tube Geoprobe® drilling methods across the Property (refer to **Figures 1&2**). Soil samples will be collected continuously in each borehole extending to a maximum depth of 10 feet below ground surface. Soil samples will be field screened for the presence of volatile organic compounds (VOCs) using a photoionization detector (PID).

Stratigraphic borehole logs will be prepared by Stantec personnel in general conformance with the ASTM International (ASTM) Method D-2488. All soil sampling equipment will be washed with a detergent solution, and double rinsed with potable water before each soil sample is collected to prevent sample cross-contamination.

Up to two soil samples collected from each borehole will be preserved and submitted for laboratory analysis to confirm the field screening results and evaluate contaminant concentrations and extent. The soil sample exhibiting the highest PID and an additional soil sample to determine vertical depth of contamination in each borehole will be preserved and submitted for laboratory analysis to evaluate contaminants at that location. All soil samples will be laboratory analyzed for PAHs and RCRA metals. If, based on field screening results, potential VOCs are identified in a screened sample, that sample would also be analyzed for VOCs. In addition, to support future construction, two soil samples will be composited and submitted for typical waste characterization parameters to assist in securing landfill disposal in the future.

All soil samples will be placed in laboratory-supplied containers, preserved as appropriate, stored on ice, and submitted under chain-of-custody procedures to TestAmerica Laboratories, Inc. (TestAmerica), a State of Wisconsin-certified laboratory, for analysis of PAHs, RCRA metals, and possibly VOCs.

Following field activities and receipt of analytical results, the results of this workplan will be summarized in a report to WDNR, including figures and tables to provide the results and compare them to applicable Chapter NR 720 WAC RCLs.

CONCLUSION

This information is being provided to alert the WDNR to planned investigation activities. If you have questions or wish to discuss the activities outlined in the workplan or future Property redevelopment, please contact us.

Regards,

STANTEC CONSULTING SERVICES INC.



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Enclosures

Figure 1: Proposed Soil Sample Locations – South Half of Property

Figure 2: Proposed Soil Sample Locations – North Half of Property

FIGURES

