

Graham, Joseph R - DNR

From: Graham, Joseph R - DNR
Sent: Wednesday, November 09, 2022 3:05 PM
To: Gross, Stu
Cc: Lennie, Brian; Cull, Whitney; christian.z; Fischer, Kayla; Endsley, Erin A - DNR; Hunt, John T - DNR; Saari, Christopher A - DNR; Sager, John E - DNR
Subject: RE: Updated Materials Management Plan and Chapter NR 718 Exemption, C. Reiss Coal Dock Property

Stu and others,

Thank you for providing the additional information requested on the Materials Management Plan (MMP) for the redevelopment of the C. Reiss Company coal dock in Superior. DNR has reviewed the information provided by Stantec and presented the plan for peer review by the Northern Region Remediation and Redevelopment Team. Based on our review, most of our concerns have been addressed; however, there are some remaining items where additional clarification is needed. The remaining items listed below need to be addressed to the satisfaction of the DNR before we can provide the requested written confirmation that the approach described by Stantec in Updated Materials Management Plan and NR 718 Exemption is appropriate and acceptable to the agency.

1. Expand geotechnical evaluation to assess the impacts of placing significant volumes of material on site – what is the bearing capacity of site soils to sustain this additional load?
2. The RR grade and stormwater pond call for excavating site soils, extending into the confining clay layer, and potentially breaching the clay layer. This, combined with the placement of large volumes of soil and sediment adjacent to these excavated areas, could impact the hydrogeologic conditions at the site. There needs to be an evaluation of both the geotechnical and hydrogeological aspects of the proposed excavation and placement of material. To what extent will the proposed activities impact groundwater conditions, including the migration of contaminated groundwater and LNAPL? Do you anticipate the potential migration of contaminated groundwater and LNAPL to the surface in excavated areas? In what other ways will site hydrogeological conditions be impacted by the proposed placement and excavation of material?
3. Contaminated groundwater and LNAPL on the adjacent property to the east are not shown in figures 7 & 8.
4. Provide additional clarification on the contact of contaminated materials with rainwater and management of that water prior to cover completion.
5. The degree and extent of contamination needs to be defined for the high PAH soil concentrations near the proposed stormwater pond (e.g., SB9 and SB10) and the high arsenic location (STN20). Accordingly, DNR is considering conditional approval of the site investigation report.
6. High PAH soil concentrations (e.g., SB9 and SB10) may need to be segregated within the disposal berm or disposed off-site.
7. The soil quality – profile view in Figure 11 is distorted since the cross-section excludes locations SB9 and SB10 with the highest PAH contamination levels
8. A more frequent inspection frequency of the cap may be needed to ensure the integrity of the cap is maintained over the contaminated materials.
9. Dredging sheet C-103 (30%) appears to show a culvert entering the stormwater pond from the ditch adjacent to the railroad grade. This feature is not shown on other sheets. Is a hydrological connection between the ditch and stormwater pond be needed and will a culvert be installed where shown on sheet C-103 (pdf page 192 of 535 in Stantec response)?
10. The MMP emphasizes the definition of impervious surfaces for runoff management under NR 151.002(17) which is not analogous to a low permeability cover for environmental contamination.

DNR would like to have a call with C. Riess and Stantec to discuss these items and identify a path forward for redevelopment of the site. Please have one person from C. Reiss and Stantec respond to the Doodle Poll below with the availability of your team.

<https://doodle.com/meeting/participate/id/b4Q4OZkd>

We look forward to continuing the dialogue for this important project.

Please contact me with any questions.

Thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Joe Graham

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From: Gross, Stu <Stu.Gross@stantec.com>

Sent: Friday, October 14, 2022 2:32 PM

To: Graham, Joseph R - DNR <Joseph.Graham@wisconsin.gov>

Cc: Lennie, Brian <Brian.Lennie@stantec.com>; Cull, Whitney <Whitney.Cull@stantec.com>; christian.z <christian.z@thereiess.com>; Fischer, Kayla <Kayla.Fischer@stantec.com>

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Good afternoon Joe-

As discussed this morning, I'm providing a copy of the Updated Materials Management Plan (MMP) and Chapter NR 718 Exemption (text only) for the C. Reiss Coal Dock Property. This version easily illustrates, via redline edit, changes made from the original MMP. A full copy of the updated MMP and our response to WDNR comments will be uploaded to the portal on Monday.

Have a great weekend!!

Stu Gross PG

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