

**From:** Byers, Harris <Harris.Byers@stantec.com>  
**Sent:** Friday, March 22, 2024 12:17 PM  
**To:** Beggs, Tauren R - DNR  
**Subject:** Response to WDNR Comments on River Landing  
**Attachments:** River Landing Response Letter.pdf

Team:

On behalf of the project, I just uploaded the attached response letter to the RR Portal.

Please call if you have additional questions on the project.

Sincerely,

**Harris Byers, Ph.D.**

Sr. Brownfields Project Manager  
Contaminant Hydrogeologist / Urban Geochemist

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March 18, 2024

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

Dear Mr. Beggs,

**Reference: Response to WDNR Comments on the Ch. NR 716 Site Investigation Addendum  
Proposed River Landing Redevelopment in the River Point District  
Manitowoc, Wisconsin  
BRRTS ID: 02-36-593784**

In following up to our telephone call on Tuesday, and on behalf of River Landing Developers, LLC (the "Developer") and the City of Manitowoc (the "City"), Stantec Consulting Services, Inc. (Stantec) prepared this letter to address comments provided in your email sent on February 28, 2024 regarding the Stantec (2023a) Site Investigation (SI) Addendum for the proposed mixed-use multi-family and commercial redevelopment (herein referred to as "River Landing" or the "Property") in the Phase I Redevelopment Area of the River Point District. The Property is outlined in black on **Figure 1** and **Figure 2** and the location of the River Point District near the property is outlined in yellow on **Figure 1** and **Figure 2**.

Your comments are provided below with Stantec's response provided in indented text.

**Comment 1.** *For sediment, please provide additional justification as to why a sediment investigation is not warranted. Please refer to the factors to consider (such as overland flow, direct conduits like pipes, sewer lines, or outfalls) as outlined in the DNR Guidance Documents Guidance: When should a site investigation enter surface water?, RR-0117 and Guidance on Addressing Contaminated Sediment Sites in Wisconsin, RR-0124.*

As described below, the Property does not appear to pose a threat to sediment quality in the Manitowoc River, therefore, a sediment investigation is not warranted as part of the ch. NR 716 Site Investigation.

**Prior Property Use.** As summarized by Stantec (2023a), the Western Railroad Company developed the Property for railroad use in the late 19<sup>th</sup> Century by constructing multiple spur lines connecting an adjacent (offsite) warehouse to a nearby barge slip. A building permit was issued to the Soo Line Railroad on 11/24/1980 to raze the former railroad depot, which largely terminated railroad use at the larger River Point District. The spur lines at the Property appear to have been removed by 1992. Records have not been identified suggesting a building was ever constructed at the Property nor that the Property was used for industrial purposes beyond railroad spur lines.

**Surface Water Discharge.** The geophysical survey completed during the Site Investigation did not identify outfalls/piping to suggest that the prior occupant of the Property discharged industrial waste/liquids from the Property to the Manitowoc River. In addition, outfalls to the Manitowoc River are not visible on historic orthophotography and panoramic photographs from the late 19<sup>th</sup> and 20<sup>th</sup> Centuries. Therefore, it does not appear the Property is a direct source of impacts to sediment to the Manitowoc River.

**Property Boundary.** As illustrated on **Figure 1** and **Figure 2**, the Property does not extend to the shoreline. Instead, the City of Manitowoc will retain ownership of the shoreline and the area between the shoreline and the Property as a public rights of way. As such, impacted historic granular fill at the Property is not likely to be transported to the River through overland flow. Please note, the City recently constructed an engineered barrier along the shoreline of the Manitowoc River to prevent potential migration/transport of soil impacts into the River.

**Proposed Construction.** A Chapter 30 Permit Application will be submitted from the Developer to WDNR to protect the Manitowoc River during construction. Anticipated stormwater controls during construction will include a turbidity barrier, silt fence, and/or interim manufactured perimeter control.

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With these protections, surface water/sediment within the Manitowoc River is not perceived to be at risk from Property construction activities.

**Comment 2.** *For vapor, please provide a screening for chlorinated volatile organic compounds (CVOCs), due to potential (primarily from soil screening criteria) for impact to this site from adjacent Lot 3 – Former Turntable/Roundhouse area. You can utilize data from the closed case WCL – Turntable Former Roundhouse, BRRTS # 02-36-176478 and the more recent data collected in the Lot 3 area associated with the case RR Turntable (Former), BRRTS # 02-36-593783 to provide your justification. Please refer to Section 3.4 of DNR’s guidance document Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, RR-800, for the CVOC screening criteria.*

As described below, chlorinated solvents do not appear to pose a risk for vapor intrusion. However, as noted in the Stantec (2023b) *Remedial Action Plan and Material management Plan*, a passive sub-slab depressurization system will be installed beneath the future buildings as a conservative best practice.

**Constituents of Concern.** Historic investigations completed in 2001-2004 under BRRTS Case No. 02-36-176478 identified trichloroethene (TCE) and daughter products (vinyl chloride and cis-1,2-dichloroethene) in groundwater at MW-1 and/or MW-2 at concentrations greater than the applicable ch. NR 140 Enforcement Standard (ES) and/or Preventive Action Limit (PAL). Monitoring wells MW-1 and MW-2 were abandoned when BRRTS Case No. 02-36-176478 was closed. The approximate locations of MW-1 and MW-2, along with additional wells installed between 2001-2004, are illustrated on **Figure 2**.

Stantec installed several monitoring wells and temporary wells during multiple phases of investigation at the River Point District. Groundwater wells sampled for VOCs are illustrated on **Figure 2**. Of note, TCE was not detected in groundwater in Lot 3 nor elsewhere near the Property. Therefore, TCE is not retained as a potential constituent of concern for this portion of River Point.

**Screening Evaluation.** The concentration of vinyl chloride in groundwater in Stantec (2023a) well MW-234 (replacement for historic well MW-2) exceeded the ES. The concentrations of cis-1,2-dichloroethene in Stantec (2023a) well MW-231 (replacement for historic well MW-1) and Stantec (2023a) well TW-230 exceeded the PAL. These COCs are discussed further below based on the screening parameters in Section 3.4.2 of WDNR PUB-800.

Soil. As illustrated on **Figure 1**, the proposed buildings are not over nor within 100 feet of chlorinated solvent impacted soil.

Groundwater (below foundation). As illustrated on **Figure 2**, the proposed building will not be located over groundwater with CVOC concentrations greater than ES.

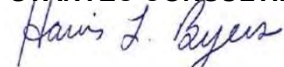
Groundwater (contacts foundation). As illustrated on **Figure 2**, groundwater that may contact the building’s foundation is not expected to have concentrations of CVOCs greater than applicable PALs.

Preferential Pathways. Utility lines will not transect a chlorinated solvent source area. As an additional protection, clay plugs will be installed in utility trenches at the property boundary to further reduce the potential for preferential pathways.

We request concurrence our response has adequately addressed your two questions.

Regards,

**STANTEC CONSULTING SERVICES INC**



Harris L. Byers, Ph.D.  
Sr. Brownfields Project Manager  
Email: [Harris.Byers@Stantec.com](mailto:Harris.Byers@Stantec.com)

**STANTEC CONSULTING SERVICES INC.**



Katie Schulz, MS  
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March 18, 2024  
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**Reference: Response to WDNR Comments on the Ch. NR 716 Site Investigation Addendum  
Proposed River Landing Redevelopment in the River Point District**

Attachments:  
Figures

### **SELECT REFERENCES**

Stantec, 2023a, Addendum-1 to the Stantec (2021) NR 716 Site Investigation Report, River Point District, Phase 1 Redevelopment Area; Manitowoc, Wisconsin. BRRTS # 02-36-585491, November 21, 2023.

Stantec, 2023b, Remedial Action Plan and Material Management Plan, November 22, 2023.

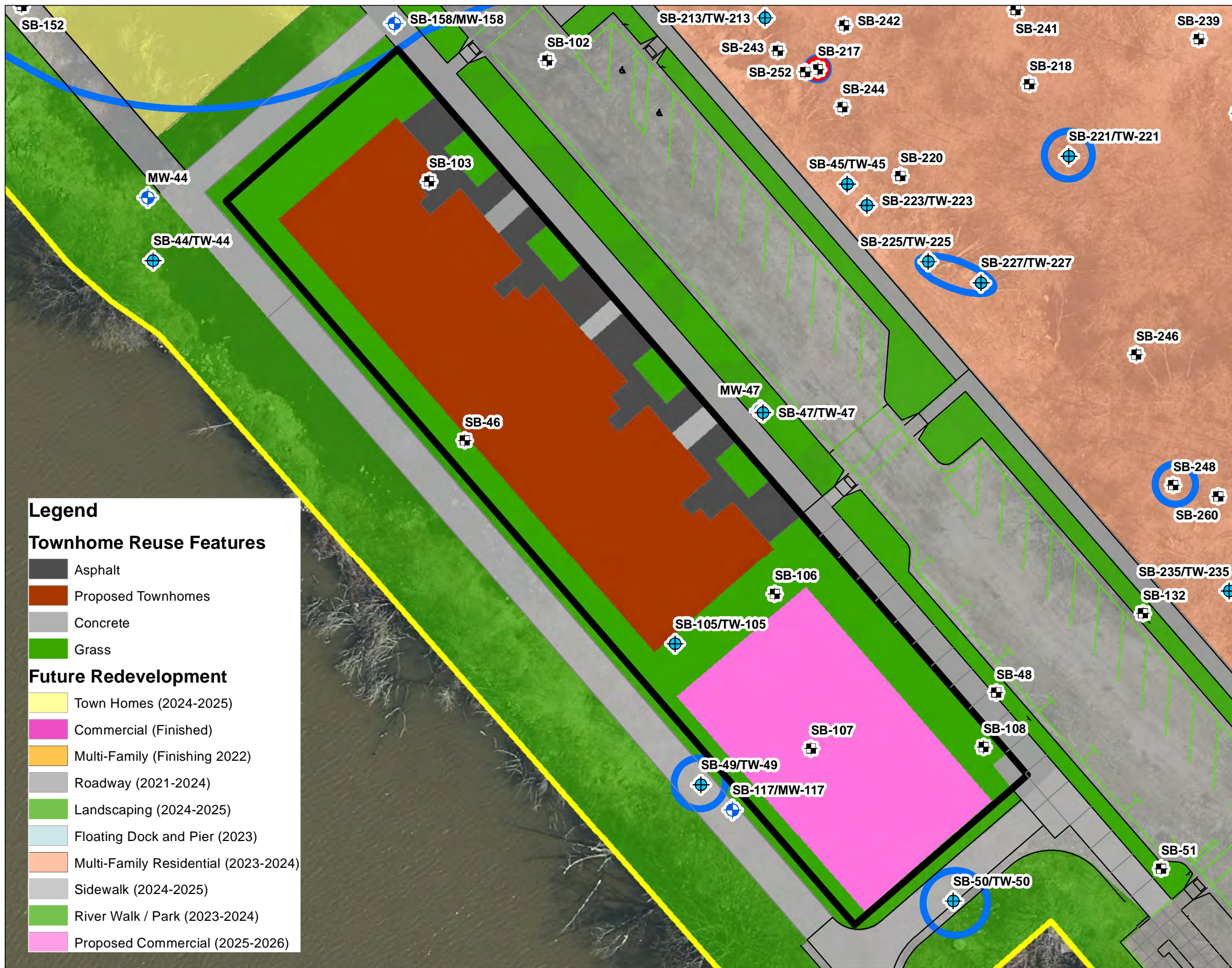
### **LIMITATIONS**

The conclusions in this letter are Stantec's professional opinion, as of the time of the letter, and concerning the scope described in the letter. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. This letter relates solely to the specific project for which Stantec was retained and the stated purpose for which the letter was prepared. This letter is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from the City and the CDA and third parties in the preparation of this letter to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This letter is intended solely for use by the City and the CDA in accordance with Stantec's contract with the City. While this letter may be provided to applicable authorities having jurisdiction and others for whom the City and the CDA is responsible, Stantec does not warrant the services to any third party. This letter may not be relied upon by any other party without the express written consent of Stantec, which may be withheld at Stantec's discretion.

## FIGURES



**Legend**

**Townhome Reuse Features**

- Asphalt
- Proposed Townhomes
- Concrete
- Grass

**Future Redevelopment**

- Town Homes (2024-2025)
- Commercial (Finished)
- Multi-Family (Finishing 2022)
- Roadway (2021-2024)
- Landscaping (2024-2025)
- Floating Dock and Pier (2023)
- Multi-Family Residential (2023-2024)
- Sidewalk (2024-2025)
- River Walk / Park (2023-2024)
- Proposed Commercial (2025-2026)

Figure No. 1  
 Title: Sample Locations and Soil Impacts  
 Client/Project: Site Investigation Project Area  
 River Point District  
 City of Manitowoc  
 0 25 50 Feet  
 Prepared by HLB on 5/8/2023

**Legend**

- River Point District
- Site Investigation Project

**Sample Locations**

- Soil Boring / Monitoring Well
- Soil Boring
- Soil Boring / Temp Well

**Soil Impacts**

- PCB > NIDC
- PVOC > GW Pathway

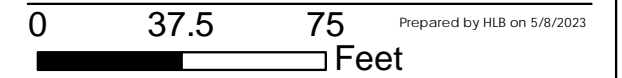
Notes

- Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
- Orthophotograph: Manitowoc County, 2020
- Soil impacts illustrated on this figure are in addition to sitewide impacts from PAHs and heavy metals associated with granular fill materials. PCB = polychlorinated biphenyl, PVOC = petroleum volatile organic compounds; NIDC = non-industrial direct contact pathway.



Figure No. **2**  
 Title  
**VOC Sample Locations and Groundwater Impacts**

Client/Project  
 River Landing  
 River Point District  
 City of Manitowoc



**Legend**

- River Point District
- Site Investigation Project Area

Previous TRC Sample Locations

- Monitoring Well

Stantec (2021-2023) VOC Sample Locations

- Soil Boring / Monitoring Well
- Soil Boring / Temp Well

Groundwater Impacts (Stantec, 2023)

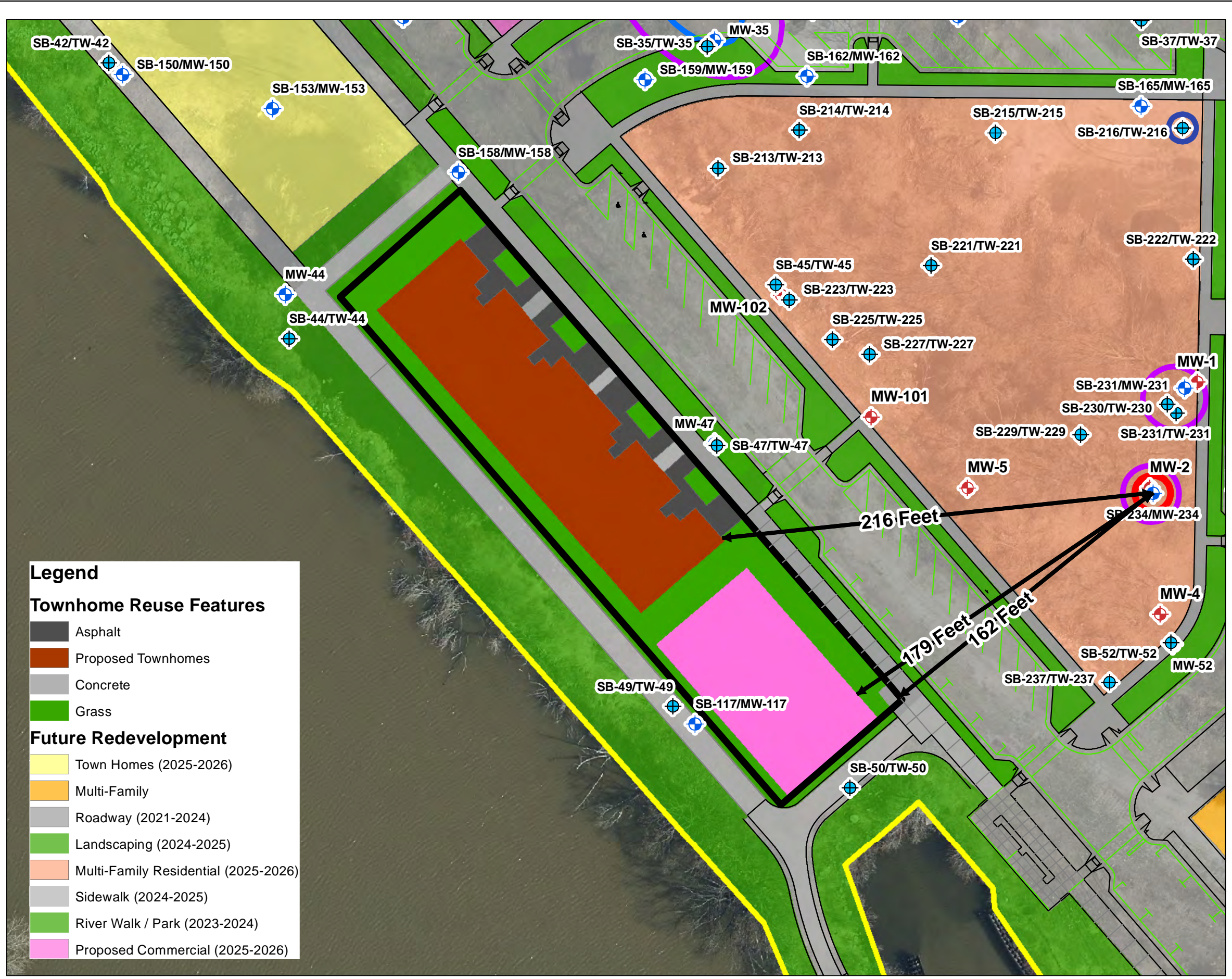
- CVOC > ES
- CVOC > PAL
- PAH > PAL
- PVOC > PAL

Lot 3

- Lot 3

Notes

- Coordinate System: NAD 1983 HARN WISCRS Manitowoc County Feet
- Orthophotograph: Manitowoc County, 2020
- CVOC = chlorinated volatile organic compounds; PAH = polycyclic aromatic hydrocarbon; PVOC = petroleum volatile organic compound; PAL = preventive action limit; ES = enforcement standard.



**Legend**

**Townhome Reuse Features**

- Asphalt
- Proposed Townhomes
- Concrete
- Grass

**Future Redevelopment**

- Town Homes (2025-2026)
- Multi-Family
- Roadway (2021-2024)
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