

From: Rozeboom, David B - DNR
Sent: Saturday, May 16, 2020 8:57 AM
To: 'John Storlie'
Cc: Randy Turtenwald (Turtenwaldr@cityoflacrosse.org); 'Kabat, Tim'; Steve Ossek
Subject: 02-32-000065: COVID19 Compliance Assistance, Schedule Delay, Municipal Wells 23 & 24
Attachments: Wells23-24_Covid19_Compl_Assist-Schedule_051420.pdf

John,

The Department has received your compliance assistance request to delay certain portions of the site investigation workplan that was approved by the department on March 10, 2020. The request specifies that the funding procurement process has been delayed due to COVID-19 and associated impacts to city council meetings. It is the Department's understanding that although certain portions of the work plan are already being conducted, the primary site investigation component will not be initiated until the funding is approved at the June, 11, 2020 city council meeting, with field work commencing in late June 2020.

The Department approves your compliance assistance request and appreciates the City's proactive approach to this project.

Thank You

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Dave Rozeboom

West Central Region Team Supervisor
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
Phone: 715-839-3710
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May 14, 2020

David Rozeboom
DNR Service Center
1300 W Clairemont Ave.
Eau Claire WI 54701

**Re: Request for COVID19 Compliance Assistance, Schedule Delay, Municipal Wells 23 & 24
WDNR BRRTS # 02-32-000065**

Dear Mr. Rozeboom:

This letter serves as a request for COVID19 Compliance Assistance for the following site. Specifically, we are requesting a 60-day delay in the site investigation schedule:

Site Information:

La Crosse Municipal Wells 23 & 24
French Island, La Crosse, WI
BRRTS # 0232000065

Notifying Person:

John Storlie
The OS Group, LLC
444 21st Street S
La Crosse, WI 54601
John.storlie@theOSgrp.com
(608) 433-9389

Primary WDNR Contact Information:

Randy Turtenwald
City of La Crosse
400 La Crosse Street
La Crosse, WI 54601
Turtenwaldr@cityoflacrosse.org
(608) 789-7505

Statute & Rule:

The City of La Crosse is requesting a relaxation of the schedule for the site investigation being conducted under the requirements of the hazardous substances spills law, §292.11, Stats, and the NR 700 series of administrative code. The schedule outlined in the Site Investigation Work Plan, as required in Wis. Admin. Code § NR 716.09(2)(h), is not achievable as discussed further below. In addition, § NR 716.11(2g) states that when the responsible party pays a fee for the department review of the work plan, field investigation shall be initiated within 60 days after department approval. The revised site investigation work plan was approved by the department on March 10, 2020. Strictly speaking, fieldwork (surveying of the location of the 2001 crash site) has been started already, meeting the 60-day requirement. The bulk of fieldwork activities, the drilling and soil/groundwater sampling, however, cannot begin until the City Council allocates sufficient funds. The city's funding approval process includes review by multiple committees prior to it being presented to the entire City Council.

Reasoning/rationale for the request:

While the project and budget would have been reviewed and the funding approval process initiated in early April, all City committee and board meetings in April were suspended due to the Covid-19 pandemic and the Wisconsin Safer-At-Home order. Remote video meetings for the City began in May, and the City's Board of Public works initiated the allocation process for the additional site investigation on May 11, 2020, and the next committee/Council cycle culminates in the June 11, 2020 City Council meeting. Thus, approval and authorization for The OS Group to engage and schedule the drilling cannot be granted until funding is authorized by the City Council on June 11, 2020 and the change order is then approved by the Board of Public Works on Monday, June 15, 2020.

This will result in a schedule delay of three (3) to six (6) weeks for drilling and subsequent critical path activities. Moreover, we anticipate the potential for slower-than-normal conduct of fieldwork to accommodate social distancing and other measures to minimize the potential for spread of the virus during fieldwork. As such, we are requesting a thirty (30) to sixty (60) day relaxation of the proposed and approved schedule to allow for allocation of funds. Assuming the necessary City approvals are made by June 15, 2020, it is anticipated that soil sampling and drilling activities will commence in late-June to mid-July 2020.

Measures to mitigate/minimize potential environmental impacts:

We do not anticipate environmental impacts from this delay as this is an investigation of legacy contamination (i.e., *past* known or potential discharges that are not currently ongoing). Nevertheless, to minimize the delays, we are taking the following steps:

- Preliminary field activities such as obtaining bids and qualifications, metal detection reconnaissance of the crash site, and assessment of existing MW-24 will have been initiated by the end of May 2020.

- Collection and analysis of decontamination water source and equipment/supplies blanks and location of underground utilities will be performed ahead of additional City Council action using already approved funding.

Please me let me know if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink that reads "John C. Storlie". The signature is fluid and cursive, with the first name "John" and last name "Storlie" clearly legible.

John C. Storlie, PG
Principal Consultant
Direct: 608-433-9389
Cell: 608-769-2433
John.storlie@theOSgrp.com

Cc: Mayor Kabat
Randy Turtenwald