

Pfeiffer, Jane K - DNR

From: Pfeiffer, Jane K - DNR
Sent: Friday, December 15, 2023 3:53 PM
To: Robert Reineke
Cc: Pratap Singh; Angy Singh; Shane LaFave; Sameer Neve; Mylotta, Pamela A - DNR
Subject: RE: CWC East Block: Plan for Temporary Storage of Hazardous Waste

Good Afternoon,

Thank you for submitting the request to use the Area of Contamination policy (AOC) under RCRA for management of hazardous soils during remedial activities at the site. To accommodate CWC's requested timeline for management of hazardous soils within the AOC, the DNR grants approval for the use of the AOC for 4 weeks, until January 12, 2024. If an extension for hazardous soil storage is needed under the AOC, a request must be submitted to the DNR by January 5, 2024. Below are conditions of this approval:

- Prior to management of hazardous soils, building and site preparations, including best management practices, should be implemented to minimize the surface areas that could be in contact/exposed to hazardous soils.
- As proposed, a berm shall be used to contain the hazardous soil, and any moisture that may be naturally present in the hazardous soil, within the berm area that is within the AOC. The purpose of this berm is to prevent anything from leaving or entering the berm area; to completely contain the hazardous soils.
- The proposed tarp on top of the berm area shall be anchored outside of the berm area to prevent any snow or rain from mixing with the hazardous soil contained in the berm area.
- Signage shall be visible indicating that the soil is hazardous and that it should not be handled/disturbed (e.g., "DO NOT DISTURB – HAZARDOUS WASTE").
- If there is a gate to prevent access to the northern courtyard, the DNR recommends that this be shut/locked. If there is not a gate, the DNR recommends that barricades be placed surrounding the stockpile and at the public access point to the courtyard to prevent vehicle access.
- The AOC shall be inspected following inclement weather events, such as rain, snow, high wind events, etc. Written and photo documentation of these inspections shall be maintained on site and submitted to the DNR upon request.
- All areas used for management of the hazardous soil, including the stockpile and the route for transporting the soil from the hazardous soil excavation area to the stockpile, must be decontaminated following use of the AOC at the site. Within 30-days of completing the excavation, provide documentation to the DNR that includes photos to demonstrate that the decontamination process is complete accompanied by a narrative describing the decontamination actions that occurred and why they are sufficient. Pre- and post-decontamination photos of the stockpile area and the route of transportation to the stockpile area should be included in this photo log. The DNR recommends that decontamination occur before the areas where hazardous soils were either stored or transported within the AOC be used.

Please do not hesitate to reach out with any questions you might have.

Thank you, Jane

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Jane Pfeiffer

Phone: (414) 435-8021

jane.pfeiffer@wisconsin.gov

From: Robert Reineke <rreineke@ksinghengineering.com>
Sent: Friday, December 15, 2023 3:04 PM
To: Pfeiffer, Jane K - DNR <jane.pfeiffer@wisconsin.gov>
Cc: Pratap Singh <psingh@ksinghengineering.com>; Angy Singh <angy.singh@ksinghengineering.com>; Shane LaFave <Shane@roerscompanies.com>; Sameer Neve <sneve@ksinghengineering.com>
Subject: RE: CWC East Block: Plan for Temporary Storage of Hazardous Waste

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Jane,

As requested, please find a drawing showing TCE on the northern portion of CWC – Block.

Please let us know if you need anything further.

Robert Reineke, PE

Senior Engineer | rreineke@ksinghengineering.com
262.821.1171, ext. 111 (p) | 262.821.1174 (f)
www.ksinghengineering.com



From: Robert Reineke
Sent: Friday, December 15, 2023 2:18 PM
To: Pfeiffer, Jane K - DNR <jane.pfeiffer@wisconsin.gov>
Cc: Pratap Singh <psingh@ksinghengineering.com>; Angy Singh <angy.singh@ksinghengineering.com>; Shane LaFave <Shane@roerscompanies.com>; Sameer Neve <sneve@ksinghengineering.com>
Subject: FW: CWC East Block: Plan for Temporary Storage of Hazardous Waste

Dear Jane,

We would like to submit a request for approval of temporary storage of hazardous soils in the Northern Parking Lot of CWC East Block. As a clarification, CWC would like to use the Area of Contamination in RCRA for management of hazardous soils. The attached Figures show the limits of the Area of Contamination. Figure 1 shows the extent of TCE contaminated soils within the East Block buildings in the Area of Contamination. Figure 2 shows the area where hazardous soil excavation will take place within the Area of Contamination. Below please find a reference map showing the location of temporary storage of hazardous soils which is supplemented by Figure 3 which also shows the Area of Contamination. The vertical extent of excavation will range from 4-5 feet. Please note that the excavated soils are not being treated onsite. We are strictly proposing temporary storage before loading on the hauling trucks for disposal.



The plan for storage is as follows:

1. An area of approximately 30 feet by 50 feet will be used to temporarily store hazardous soils. The existing surface is a recently renovated asphalt parking lot.
2. A tarp will be placed on the surface of the 30x50 area in the parking lot.
3. Sheets of plywood covering 30x50 feet will be placed on top of the tarp.
4. An 8" berm of wood will be constructed on the perimeter.
5. The wooden berm will be covered with the underlying tarp and secured to contain any snow/rain.
6. Contaminated soil will be placed inside the berm area.
7. Soil will be covered with a double layer of tarp and anchored in the asphalt at multiple locations.
8. Soil will be removed after excavation is complete from the temporary storage area by US Ecology and hauled off.

Soil excavation and hauling will be completed in the next 2-3 weeks. Please note that this submittal is an amendment to our Remedial Actions Options Report and is certified under this report. We would appreciate your timely approval. Please let us know if you have any questions or need any additional information.

Thank you,

Robert Reineke, PE
 Senior Engineer | rreineke@ksinghengineering.com
 262.821.1171 (p) | 262.821.1174 (f)
www.ksinghengineering.com

