Amadi, Eric A - DNR

From: Michelle Peters <mpeters@ramboll.com>
Sent: Thursday, May 16, 2024 1:26 PM
To: Amadi, Eric A - DNR
Cc: Melinda Dejewski; Donna Volk; Alessi, Timothy G - DNR
Subject: RE: City of West Allis New DPW Facility, NR 718 Exemption Request, Former Teledyne Industries. BRRTS #: 02-41-556802; FID #: 241008900

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Hi Eric,

The intent is to use clean clay salvaged from the existing clean soil cap to construct the final clean cap in landscaped areas. Should there be insufficient volume of clean clay salvaged from the existing cap to allow for this, then clean soil will be imported to construct the final soil cap. The plan does not propose re-use of any other soils from on-site (besides the clean clay from the existing site cap) to construct the final cap in landscaped areas, as described in the Barrier Maintenance Plan.

Thank you,
Michelle

Michelle Peters, PE*

Managing Consultant

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* PE - CO, UT, WI

Classification: Confidential

From: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Sent: Wednesday, May 15, 2024 3:09 PM
To: Michelle Peters <mpeters@ramboll.com>
Cc: Melinda Dejewski <MDejewski@westalliswi.gov>; Donna Volk <dvolk@ramboll.com>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>
Subject: RE: City of West Allis New DPW Facility, NR 718 Exemption Request, Former Teledyne Industries. BRRTS #: 02-41-556802; FID #: 241008900

Hi Michelle:

I have presented the referenced subject to the Peer Review Group. Please provide clarification regarding:

- What soils that will be used for the clean cap materials in the greenspace area.
    - Will this be imported or will it be the “clean cap material” generated from the site?

Let us know.

Thanks.

Eric

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Eric Amadi
Phone: (414) 405-0752
eric.amadi@wisconsin.gov

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From: Michelle Peters <mpeters@ramboll.com>
Sent: Wednesday, May 8, 2024 8:30 AM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Melinda Dejewski <MDejewski@westalliswi.gov>
Cc: Donna Volk <dvolk@ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Meyer, Jennifer S - DNR <jennifer.meyer1@wisconsin.gov>; Moll, John G - DNR (Gregory) <john.moll@wisconsin.gov>
Subject: RE: City of West Allis New DPW Facility, NR 718 Exemption Request, Former Teledyne Industries. BRRTS #: 02-41-556802; FID #: 241008900

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Hello Eric,

Based on your comments in the previous email and our discussion on Friday, April 19th, we have provided responses to each of your comments below.

1. ***An explanation of what soils (contaminants) are going to be reused onsite (should not contain VOCs).*** The attached figure includes the proposed cut/fill plan for this site. Mass grading at this site will generate much more cut than the volume of fill soil required. As such, the majority of the soil excavated from the site will be disposed off-site in a licensed landfill. Soils to be considered for potential on-site re-use will be restricted to areas of the site in which no VOCs have been identified in site soils.

   Areas labelled as Soil Areas 1-5 have been identified as areas of proposed cut which do not contain detections of VOCs at any depth. The approximate cut depth for each area is shown on the attached map. In addition to these five areas, the site is currently capped with a soil barrier that includes 4 inches of topsoil underlain by 6 inches of clay. Prior to the commencement of activities, the clay from this soil cap will be salvaged and stock-piled for eventual on-site re-use as clean fill within excavations. In total, the five designated soil areas plus the clay component of the existing clean cap total approximately 13,895 cubic yards (CY) of soil considered suitable for potential on-site re-use.

   Excavations associated with the two UST removals and the lead and TCE hot spot areas are estimated to require approximately 3,600 CY of approved backfill. This volume of approved backfill will be generated using clay soil salvaged from the existing clean soil cap. The other two areas of the site which will required limited quantities of fill, labelled as Fill Areas 6 and 7 on the attached figure, will be filled first with clean clay generated from the existing clean soil cover, as available, and thereafter with soil to be generated during mass grading activities in Soil Areas 1 and 2. In the event that insufficient volume of soil that meets the structural suitability requirements for use as fill is generated from salvage of the clean cap and grading in Soil Areas 1 and 2, Soil Areas 3, 4 and

5 have also been designated as areas in which soils to be excavated are suitable for on-site reuse. No other relocation of soil across the site is anticipated.

A Ramboll field representative will be on-site to screen all excavated soil planned to be stockpiled on-site for eventual re-use. Soil will be assessed for visual and olfactory evidence of impacts and will also be screened with a PID to ensure no VOCs are present. A Ramboll representative will also be on-site to oversee placement of re-used soil. Further, the portion of the proposed main building that will overly areas of soil re-use will be constructed with a vapor barrier and piping associated with a passive vapor ventilation system that can be activated if warranted based on the results of post-construction vapor sampling.

Excess cut soil that may be suitable for re-use on the site has been identified in the event that areas of the site are discovered to contain soil/fill that is structurally unsuitable and thus requires excavation and backfilling.

2. ***Provide the proposed cap figure and maintenance plan (referenced in the MMP).*** The barrier maintenance plan for this site is attached.

3. ***Place the soil RCL lines superimposed on the cut/fill map.*** The attached map includes soil RCL exceedances as well as the cut/fill plan and areas proposed as suitable for potential on-site re-use.

    1. ***This could be used to isolate areas not to be reused.*** Soils generated from excavations outside of designated Soil Areas 1 through 5 (excluding the salvage of the clean soil cap) will not be considered for on-site re-use.

1. ***Provide the results of the confirmation samples to show that the remaining contamination within the deeper excavation areas (this is to assure that no remaining VOCs are being proposed to be moved).*** Results from confirmation sampling to be completed as part of targeted soil removal in the TCE and lead hotspot areas will be submitted to WDNR, once available. As described above, all excavated soils contemplated for potential re-use will be screened with a PID prior to stock-piling to ensure they are free of VOCs. Only soils from within the areas designed on the attached map will be considered for potential on-site relocation and re-use.

2. ***Consider/include removing some of the high PVOCs in the targeted excavations.*** Areas in which petroleum constituents were previously identified will not be considered for potential on-site re-use. All soil excavated from these areas in support of construction activities will be disposed off-site in a licensed landfill. remedial action in these areas is not recommended, since this area will be addressed by capping with pavement and a building slab (unoccupied storage building).

3. ***Explain how the utility trenches are being backfilled.*** Utility trenches will be backfilled with compact bedding material/engineered granular backfill surrounding the installed pipe from the depth of the excavation to the base of the final cap.

Construction activities are currently scheduled to begin during the week of May 21st. We appreciate your prompt review of the above responses, and look forward to hearing from WDNR regarding this submittal, the IRAP and the Historic Fill Site or Licensed Landfill Exemption Application. Please let us know if you have any further questions.

Kind regards,
Donna and Michelle

Michelle Peters, PE*

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From: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Sent: Thursday, April 18, 2024 1:46 PM
To: Melinda Dejewski <MDejewski@westalliswi.gov>
Cc: Donna Volk <dvolk@ramboll.com>; Michelle Peters <mpeters@ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>; Meyer, Jennifer S - DNR <jennifer.meyer1@wisconsin.gov>
Subject: RE: City of West Allis New DPW Facility, NR 718 Exemption Request, Former Teledyne Industries. BRRTS #: 02-41-556802; FID #: 241008900

Hi Melinda:

On March 28, 2024, the Wisconsin Department of Natural Resources (DNR) received *Material Management Plan (MMP) Request* for the subject site, prepared by Ramboll Americas Engineering Solutions, Inc. (Ramboll) and submitted with a review fee, on behalf of the City of West Allis.

The MMP indicates that about 10,000 cubic yards of contaminated materials are planned to be managed on-site.

The generating and receiving sites are the same. Prior to conducting the proposed on-site soil management activities, focused remedial action is planned for the site. The focused remedial action consists of excavation of two hot-spot areas (TCE and lead hot-spot areas) and disposal in a licensed landfill. Confirmation sampling will be conducted prior to backfilling. In addition, two USTs will be assessed during removal and a TSSA will be completed by a certified tank inspector. Also, PCBs impacted areas (greater than groundwater pathway RCLs) will be excavated, segregated, and disposed offsite. The proposed cut/fill map was included in the MMP.

It's also our understanding that with the exception of soils to be excavated from the TCE and lead hotspot areas and the area of PCBs impacts exceeding groundwater pathway RCLs in the former Electrical Substation Area, soils excavated from the Site will be used as structural fill or fill to achieve desired final site grade in accordance with Wis. Admin. Code ch. NR 718.

Based on the information provided, the DNR requests the following items to complete the review of the MMP:

- An explanation of what soils (contaminants) are going to be reused onsite (should not contain VOCs).
- Provide the proposed cap figure and maintenance plan (referenced in the MMP).
- Place the soil RCL lines superimposed on the cut/fill map.
    - This could be used to isolate areas not to be reused.
- Provide the results of the confirmation samples to show that the remaining contamination within the deeper excavation areas (this is to assure that no remaining VOCs are being proposed to be moved).
- Consider/include removing some of the high PVOCs in the targeted excavations.
- Explain how the utility trenches are being backfilled.

We would also like to mention that the Interim Remedial Action Plan is approved and we are working on the letter and will get it out soon.

Please let us know, if you have questions.

Thanks.

Eric

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Eric Amadi
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From: Melinda Dejewski <MDejewski@westalliswi.gov>
Sent: Monday, April 15, 2024 3:30 PM
To: Meyer, Jennifer S - DNR <jennifer.meyer1@wisconsin.gov>
Cc: Donna Volk <dvolk@ramboll.com>; Michelle Peters <mpeters@ramboll.com>; Patrick Schloss <pschloss@westalliswi.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Jon Wallenkamp <JonW@kuenyarch.com>; Dave Wepking <dwepking@westalliswi.gov>; Lee Anderson <Lee@kuenyarch.com>
Subject: City of West Allis New DPW Facility IRAP and NR718 Exemption Request

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Jennifer,
I'm reaching out today to check on the status of the IRAP and NR718 Exemption request that was submitted on March 21, 2024. Any update would be appreciated.

Thank you,

Melinda K. Dejewski, PE
City Engineer
City of West Allis
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