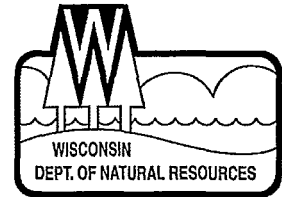


State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711



November 14, 2016

Ms. Diane Nelson
Stormwater & Administrative Manager
Environmental Services Division
City of Superior
51 E 1st Street
Superior, WI 54880

And

Ms. Darienne McNamara
Public Works Department
1316 N 14th St.
Superior, WI 54880

Subject: Approval for Management of Contaminated Soil under s. NR 718.12 Wis. Adm. Code:
Generator property: City of Superior Wastewater Treatment plant, 51 E 1st St., Superior, Wisconsin.
FID#39-6005361. (Associated BRRTs # 02-16-275446, Superior Water Light & Power MGP)
Disposal property: City of Superior Moccasin Mike Landfill. FID # 2627

Dear Ms. Diane Nelson and Ms. Darienne McNamara:

On November 10, 2016, Diane Nelson submitted a Contaminated Soil Management Plan for the City of Superior. The Wisconsin Department of Natural Resources (Department) received the \$700 technical assistance fee for providing review and response, in accordance with s. NR 749.04(1), Wis. Adm. Code.

Summary of proposed soil management

The City of Superior is constructing infrastructure at the City's wastewater treatment plant at 51 1st Street, Superior, Wisconsin. During excavation activities associated with this construction, contaminated soils/brick/debris were discovered. The wastewater treatment plant is adjacent to a former manufactured gas plant (MGP) that was operated by Superior Water Light and Power. The excavated material exhibits contamination consistent with MGP wastes. The City of Superior proposes to dispose of approximately 4,400 cubic yards (yd³) of excavated contaminated soil originating from the City of Superior Wastewater Treatment Plant at the City of Superior Moccasin Mike Landfill. City of Superior proposes to dispose of this material, in accordance with s. NR 718.12 Wis. Adm. Code which exempts the disposal site from solid waste requirements in ch. 289, Stats. and chs NR 500 to 538 Wis. Adm. Code.

Soil Characterization

Soil/waste proposed for excavation from the City of Superior Wastewater Treatment Plant is contaminated with PAHs. Samples have been collected for analysis of all contaminants previously detected or expected to be present based on past land use and from areas most likely to contain residual soil contamination. The Department concurs that the material has been adequately characterized per s. NR 718.12(1)(e) Wis. Admin. Code.

S. NR 718.12 Wis. Admin. Code Approval

Based on review of the Contaminated Soil Management Plan, the Department approves relocation of up to 4,400 yd³ contaminated soil/waste on the property from that will be excavated from City of Superior Wastewater Treatment Plant to the City of Superior Moccasin Mike Landfill. Approval is conditioned upon compliance with the following:

Conditions of approval

City of Superior shall manage excavated material in conformance with the approved Contaminated Soil Management Plan and shall notify the Department within 24 hours of discovering material if alternate soil management is proposed.

City of Superior is responsible for obtaining any local, federal, or other applicable state permits to carry out the project.

City of Superior shall submit to the Department, documentation of excavation and disposal activities within 30 days of completing the disposal activities.

The Department reserves the right to require the submittal of additional information or to modify or revoke this soil management approval if City of Superior fails to comply with the requirements of the Contaminated Soil Management Plan, as proposed. The Department also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval decision, please contact me in writing at the letterhead address, by calling 715-635-4049, or by email at james.dunn@wisconsin.gov.

Sincerely,



Jamie Dunn
Hydrogeologist
Remediation and Redevelopment Program

cc:

David W. Weber, P.E., Supervising Engineer, Superior Water Light & Power, 2915 Hill, Avenue, PO Box 519, Superior, WI 54880

Susan Fisher, Waste Management Engineer, WA/5, PO Box 7921, Madison, WI 53707-7921