

From: McKnight, Kevin - DNR
Sent: Tuesday, November 28, 2023 10:32 AM
To: SDP
Subject: RE: Cedarburg, Amcast SIWP

You are welcome. Remember that this is a pretty high level overview of the process and it may change based on future EPA work, property owner plans, and other factors that may come up.

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kevin D. McKnight

Phone: 920-808-0170

Kevin.McKnight@wisconsin.gov

From: SDP <sampson.parsons@gmail.com>
Sent: Tuesday, November 28, 2023 10:16 AM
To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Subject: Re: Cedarburg, Amcast SIWP

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Thanks, Kevin. Incredibly helpful.

Have a good day,
Sampson

On Tue, Nov 28, 2023, 10:14 AM McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov> wrote:

I made some edits below. BTW, the scenario you outlined is based on property owner waiting until EPA implements the ROD. If property owner wishes to move forward, they are responsible to follow NR700 in planning and implementing development with approval of DNR and EPA. Costs for this work would be on the developer as EPA will not pay for costs outside the scope and timetable of the ROD. This is the reason for DNR pushing for the SIWP and SIR in 2018 after site acquisition as development was being proposed on a faster timeline than the EPA work.

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Kevin D. McKnight

Phone: 920-808-0170

Kevin.McKnight@wisconsin.gov

From: SDP <sampson.parsons@gmail.com>
Sent: Tuesday, November 28, 2023 10:04 AM
To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Subject: Re: Cedarburg, Amcast SIWP

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You've been really helpful (and patient), thank you. I don't want to take any more of your time, but if I could just summarize so I'm clear, because I'd like to share some of this with a Common Council member:

1. The EPA is going to remove a bunch of contaminated soils from varying depths across the 8 acre Amcast property.
2. The EPA will replace those removed soils with clean fill, to grade.
3. When the EPA is finished, the site will be much cleaner, but not be "clean" enough.
4. The developer ~~will likely~~ may incur ~~some costs for additional soil remediation come development time,~~ after the EPA is finished, to meet ~~parts of~~ NR700.
5. ~~The likely additional soil remediation will be done by excavating a little deeper than the EPA did.~~ Additional work will be based on development plan and type of NR700 closure conditions the property owner desires.

Do I have it about right?

Thanks again,
Sampson

On Tue, Nov 28, 2023 at 9:43 AM McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov> wrote:

EPA is using soil standards equal to NR700 for this site. One example of differences between NR700 and EPA is the definition of "direct contact". EPA uses 0-2' while NR700 uses 0-4' to define the direct contact zone. This can affect capping requirements at time of NR700 closure. Issues such as this were identified in comments to the proposed plan and the ROD.

At many urban redevelopment sites, the redevelopment is part of the remedial action. Very few sites are "clean" when completed. Most sites have residual contamination to be addressed if excavated during redevelopment (foundation/basement/utilities..) or other issues.

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Kevin D. McKnight

Phone: 920-808-0170

Kevin.McKnight@wisconsin.gov

From: SDP <sampson.parsons@gmail.com>
Sent: Tuesday, November 28, 2023 9:29 AM
To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Subject: Re: Cedarburg, Amcast SIWP

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That makes sense, thanks. I had assumed that all of EPA's work would meet Wisconsin NR700 requirements, but it sounds like maybe NR700 could have more demanding levels of remediation than what the EPA is planning. I think I, and probably many others, assumed that as soon as the EPA was done with the Amcast property, it would be clean as a whistle and ready for development activities. But, there may be some contamination levels remaining that could require more excavation/remediation. It's frustrating to envision the EPA finally finishing, but then Burns excavating through clean fill to get at some remaining contaminated soils that do not meet NR700.

On Tue, Nov 28, 2023 at 9:16 AM McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov> wrote:

At this site the property owner is exempt from federal superfund liability but required to meet the state requirements under NR700. Depending on the final EPA work, there may be discrepancies between SF and NR700 that may need to be documented or addressed by the property owner to obtain closure under NR700. If the property owner wishes to develop the property prior to EPA performing their work, the property owner is responsible to pay for and perform the work according to NR700. The property owner also is required to obtain prior EPA approval for site work.

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Kevin D. McKnight

Phone: 920-808-0170

Kevin.McKnight@wisconsin.gov

From: SDP <sampson.parsons@gmail.com>
Sent: Tuesday, November 28, 2023 9:06 AM
To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>
Subject: Re: Cedarburg, Amcast SIWP

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Hi,

Because it's a Superfund site, and will be remediated prior to any development activities, would there be any contaminated soils left to be identified, segregated, and disposed of ?

Thanks

On Tue, Nov 28, 2023 at 8:57 AM McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov> wrote:

A materials management plan documents how contaminated material will be identified, segregated, and disposed of at a site. It is typically part of a development plan or remedial plan. These can be submitted regardless of the investigation status.

[Contaminated soil and sediment | Wisconsin DNR](#)

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Kevin D. McKnight

Phone: 920-808-0170

Kevin.McKnight@wisconsin.gov

From: SDP <sampson.parsons@gmail.com>

Sent: Tuesday, November 28, 2023 8:31 AM

To: McKnight, Kevin - DNR <Kevin.McKnight@wisconsin.gov>

Subject: Cedarburg, Amcast SIWP

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Hi Kevin,

Is a development/materials management plan part of a SIWP, or is it a separate document/plan? I think the SIWP is about 5 years or more late already, right?

Thanks,
Sampson Daniel Parsons

Interested resident of Cedarburg

414-640-3474