



January 25, 2021

Sent Via E-mail

Mr. Thomas Speno and Mr. Ritchie Speno
Preferred Development Madison LLC
1723 Banks Road
Margate, FL 33063

Dear Mr. Thomas Speno and Mr. Ritchie Speno:

Subject: Soil Materials Management Plan for Proposed Distribution Center at the Dane County Regional Airport. BRRTs #02-13-584472

The Wisconsin Department of Natural Resources (DNR) received a Materials Management Plan (MMP) for a proposed distribution center to be located at 2517 Bowman Street, Madison. This property is located within the boundaries of the Dane County Airport. The report was prepared by SCS Engineers and submitted on behalf of Preferred Development Madison, LLC on January 13, 2021.

The proposed center is to be approximately 27,200 square feet. The building will be positioned to sit approximately 0.5 feet above the elevation of the existing tarmac. The tarmac elevation will not be altered as part of this project. The building will have below grade loading dock ramps. To accommodate the building and loading dock area, approximately 7,400 cubic yards of soil will need to be moved from the site.

In addition to the construction work related to the building, this project also includes installing an improved stormwater drainpipe extending from the northern edge of the site for approximately 650 feet along the edge of the airport tarmac. Trenching for this pipe will involve excavations to depths of 9 feet or more below ground surface.

The water table in the area of proposed construction ranges from approximately 4.5 – 6 feet below grade. Dewatering of the area surrounding the building and stormwater pipe is anticipated to be performed in order to complete construction of the building foundation and stormwater pipe.

There have been two soil and groundwater sampling events completed on this property. A Phase 2 assessment of the property was completed by St. John-Mittelhauser & Associates (SM&A) and submitted to DNR on August 12, 2020. A second field sampling event was completed by SCS Engineers. That information was submitted to DNR on January 13, 2021 as part of the MMP.

Groundwater Quality

Groundwater samples collected from this area detected very low concentrations of VOCs and PAHs. No samples had concentrations above NR 140 Wis. Adm. Code groundwater quality standards.

Numerous PFAS compounds were found in groundwater samples collected from the area of the proposed building. Concentrations in some of the samples exceed the EPA Health Advisory Level of 70 ng/l for combined PFOA/PFOS. Wisconsin does not currently have promulgated groundwater quality standards for PFOA and

PFOS. The rule making process has started for promulgating groundwater standards for PFOA and PFOS and the current proposed values for those compounds is 20 ng/l, individually or combined.

Metals concentrations collected in the SM&A Phase 2 assessment did exceed NR 140 Wis. Adm. Code groundwater quality samples. These samples were collected from monitoring points that had not been fully developed and were described as turbid. Additional metals sampling of groundwater was completed in the work by SCS Engineers. These samples were described as non-turbid and clear. There were no analytical results exceeding groundwater quality standards for metals in the samples collected by SCS Engineers.

The MMP indicates that dewatering of the site will be necessary in order to complete construction of the building foundation, loading docks and stormwater pipe. PFAS and metals levels in the groundwater may require a discharge permit from the DNR's Wastewater Program for the dewatering efforts necessary for construction. You should contact the Wastewater Program to discuss requirements that may be necessary for the dewatering aspects of this project.

Soil Quality

Soil samples collected from the area of the proposed building and stormwater pipe were analyzed for VOCs, PAHs, metals and PFAS compounds. No VOCs were detected in any of the samples and low levels of PAHs were detected in one sample and all analyses for VOCs and PAHs were below regulated levels. Metals were detected in all soil samples and concentrations were less than regulated levels or background threshold values. PFAS compounds were detected in soil samples. Concentrations were below state regulated levels for direct contact.

Soil Materials Management Plan

The project plan is to excavate approximately 7,400 cubic yards of soil from the area of the proposed building. This soil would be moved within 500 feet east of the area from which it is excavated. This location is within the boundaries of the Dane County Airport. The materials would be spread to a thickness of approximately 1 foot. Prior to placing the excavated soil, the existing topsoil from the laydown area will be removed. After placing the excavated soil, the topsoil will be replaced and seeded. Dane County, as owners of the Airport, will maintain the area where the soil is to be placed.

Approval

The Materials Management Plan is **approved** subject to the following conditions:

1. Management of excavated soil shall be completed in conformance with the approved materials management plan and shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the Department.
2. Preferred Development Madison, LLC shall manage excavated material in conformance with the approved materials management plan and shall notify the Department within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the Department or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the Department shall be notified within 24 hours and appropriate actions to investigate, evaluate and deal with the situation shall be proposed. Notification of discharge shall be submitted to the Department in accordance with s. NR 706.05(1).
4. Preferred Development Madison LLC is responsible for obtaining any local, federal or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the Department's Stormwater Manager to determine what, if any, permit is needed.
5. Preferred Development Madison LLC shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.

6. Preferred Development Madison LLC shall submit a documentation report to the Department within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval;
 - b. A narrative description of how the above conditions were accomplished including relevant documentation;
 - c. Color photographs documenting construction aspects addressed in this approval;
 - d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material; and
 - e. A letter under the seal of a professional engineer registered in the State of Wisconsin certifying that the project has been constructed in substantial compliance with the above conditions and explaining any deviations from the approved plans.

The Department reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if Preferred Development Madison LLC fails to comply with the requirements of the proposed MMP. 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 please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin".

Steven L. Martin, P.G.
South Central Region Team Supervisor
Remediation & Redevelopment Program

Cc: Eric Oelkers – SCS Engineers, 2830 Dairy Drive, Madison, WI 53718 (SENT VIA EMAIL)
Jason Knutson – DNR Wastewater Program Supervisor (SENT VIA EMAIL)
Delanie Breuer – Reihnhart Law (SENT VIA EMAIL)