



May 18, 2022

Larry Buechel
Waste Management, Inc.
N96 W13503 County Line Road
Menomonee Falls WI 53051

Subject: DNR Remediation/Redevelopment Comments – Property Redevelopment Plan
Boundary Road Landfill, W124 N8925 Boundary Road, City of Menomonee Falls
USEPA ID #: WID058735994
BRRTS #: 02-68-529578
FID #: 268152390
DNR License #: 11

Dear Mr. Buechel:

On behalf of Waste Management of Wisconsin, SCS Engineers submitted a Property Redevelopment Plan (RP) in February 2022 for the Boundary Road Landfill Superfund Site (BRL). The RP was included as Appendix C of the proposed Plan of Operations for the Orchard Ridge Eastern Expansion-Southern Unit (EESU). This was the second RP submittal; the DNR returned comments on the draft RP to Waste Management on June 30, 2021.

This letter outlines the remaining Remediation/Redevelopment comments on the RP that must be addressed prior to RP and Plan of Operations approval.

General Comments:

1. A Wis. Admin. Code NR 718 Materials Management Plan (MMP) becomes necessary when contaminated soil or solid waste is excavated and placed anywhere other than inside the limits of a licensed landfill. An MMP includes material volumes, temporary and permanent storage locations, length of storage, containment, testing procedures and transport details among other necessary information designed to maintain protectiveness.
2. A Wis. Admin. Code NR 506 Historic Fill Exemption becomes necessary when completing construction on top of a licensed landfill. If the waste material in the Boundary Road Landfill is not completely removed, the exemption may be necessary to construct the Eastern Expansion-Southern Unit on top of waste remaining in place.
3. The planned abandonment and replacement of monitoring wells must maintain the current level of protection for the BRL. Prior to changing the monitoring plan, please send the planned changes to the DNR Remediation/Redevelopment program for review and approval.
4. Be sure to use a VOC laboratory method with a limit of detection below the Preventive Action Limit and/or groundwater pathway RCL.

5. No PFAS sampling is proposed. When the landfill is removed, it would be an opportune time to sample in the waste area for PFAS.

Specific Comments:

6. Section 6.1.1 – Please add the word onsite to this sentence as shown; “Type 1 soil may be used *onsite* in berms/roads/cover...”
7. Section 6.1.1 – For Type 2 soil, please define what is meant by “a significant amount of waste.” Soils containing waste used outside the landfill limits require an MMP.
8. Section 6.1.1 – The text states that Type 3 soil may exceed direct contact RCLs but does not pose a threat to groundwater. While this is possible, it’s a rare situation because most groundwater migration pathway RCLs are lower than direct contact RCLs. If waste or impacted soils are used outside the landfill, an MMP is required prior to placement.
9. Section 6.2.2 – The first sentence states that the grading layer soil will primarily be classified as Type 2A. Laboratory analysis should determine the grading layer soil type.
10. Section 6.2.2 – The sampling frequency does not meet the criteria in Wis. Admin. Code NR 718.12(1) e.1. of “...*one sample shall be collected for analysis for each 100 cubic yards of contaminated soil, for the first 600 yards with a minimum of 2 samples being collected. For volumes of contaminated soil that exceed 600 cubic yards, one sample for each additional 300 cubic yards shall be collected for analysis.*” Please justify the decreased sample frequency in terms of removing material from a Superfund landfill site.
11. Section 6.2.3 – The same sample frequency comment applies as discussed for Section 6.2.2.
12. Section 6.2.3 – The text isn’t clear about what happens when contamination is found. Do you intend to subdivide the 0.5-acre and resample subsections to reduce the contaminated volume? If not, the entire 0.5-acre section must be considered contaminated when a standard is exceeded.
13. Section 6.2.3 – The RCLs established for this project are the NR 720 RCLs. It would be clearer if the text stated that in paragraph seven.
14. Section 6.2.4 – If potential geotechnical issues in saturated sand are due to the excavation, it seems possible to investigate the soil/groundwater contamination extent from the ground surface.
15. Section 6.2.4 – Assuming you will classify excavated soil into Types 1 through 4, how will you sample soils below the water table?
16. Section 7 – The variance from Wis. Admin. Code NR 141 well construction standards is acceptable as described.
17. Section 8 – Please include text referring to notifications regarding Materials Management and monitoring plan changes.

DNR Comments – Property Redevelopment Plan
Boundary Road Landfill
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Please address these comments and submit the changes with the updated Plan of Operations, as requested by the DNR Waste and Materials Management program. If you have questions or comments, contact DNR RR project manager B.J. LeRoy at BJ.LeRoy@Wisconsin.gov or 920-889-0151.

Sincerely,



B.J. LeRoy, PG
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copy:

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