



September 16, 2014

Mr. Dave Nelsen  
Project Manager  
Ruedebusch Development & Construction, Inc.  
4605 Dovetail Drive  
Madison, WI 53704

**AGENDA ITEM #28**  
**LEGISLATIVE FILE #35313**  
**COMMON COUNCIL MTG 9/16/14**

Subject: Former Royster Clark Site, 902 Dempsey Road, Madison, WI  
BRRTs # 03-13-000507 and 06-13-550137

**SOILS and GROUNDWATER MANAGEMENT PLAN APPROVAL**

Dear Mr. Nelsen:

The Department received a Soil and Groundwater Management Plan prepared by Shaw Environmental Inc. and dated September 10, 2014. The Plan was received via email on September 11, 2014. An updated version of the plan was received on September 16, 2014. Additional comments were made on the plan by Brynn Bemis and Lisa Coleman of the City of Madison.

I have reviewed the Plan which provides a proposal for managing contaminated soil at the former Royster site properties during the grading, utility trenching, and construction of Right-of-Ways and stormwater detention pond project. This determination pertains to the shaded areas described in Figure 1 (attached). If contaminated soils are intended to be encountered in areas of the property outside of the shaded areas, additional soil management plans should be submitted. The details of the Plan and the proposal for managing contaminated soil and groundwater includes the following:

- Contaminated fill encountered during the trenching and backfilling process will be temporarily stockpiled on-site in the Outlot 3 area or other areas as determined acceptable by Ruedebusch and discussed with the WI DNR. Contaminated soils, if geotechnically adequate, will be preferentially used as backfill material for trenches or excavations;
- Contaminated fill that is geotechnically unsuitable or is not able to be used as backfill will be evaluated for alternative uses on-site or will be properly managed for off-site use or disposal at a landfill. If the soils are to be used for achieving final site grades, the action will be limited to the Right-of-Way project. If soils are to be used to achieve final site grades in other areas of the property, concurrence from the DNR must be verified;
- Nitrogen contaminated soils will be collected and placed separately from the contaminated fill. Soil samples will be collected to determine options for placement or disposal of the soils;
- Pit/Trench Dewatering will comply with the WPDES permit No. WI-5067831-4 and Dewatering Technical Standards No. 1061. Dewatering in areas of groundwater contamination will direct discharges to the sanitary sewer and, in areas of no observed groundwater contamination, the discharges will go to the storm sewer; and
- A report on the soils management/movement work and dewatering activities will be submitted to the Department upon completion of the task.

The proposal for managing soils and the dewatering activities, as outlined in the Plan, is acceptable to the Department. While there may be other methods to address the contamination, given the circumstances of this project and the need and desire to address contamination in a manner that follows administrative code and Department guidelines, the proposed method set forth in the Plan is acceptable to the Department.

The Department expects that, as indicated in the Plan, individuals involved with this soils and groundwater management plan will be actively involved at the properties during the work activities to make appropriate in-field determinations regarding the status of soils that are being removed.

The Soils and Groundwater Management Plan describes Soils Remaining in-Place. For this component of the site development project, if these soils are managed according to the 'plan', areas where soils are left in-place do not require further soil management to be protective of human health and the environment. There have been discussions regarding the placement of a covenant on properties that will in conjunction with City ordinances and the 'low occupancy' location limit exposure of soil contaminants to contact from people or the environment.

If problems or questions arise that cause a deviation from the plan activities, the Department should be contacted as soon as practicable. If you have any questions regarding this correspondence, please contact me at (608) 275-3297.

Sincerely,



Wendell Wojner  
Hydrogeologist  
Bureau for Remediation & Redevelopment

cc: Brynn Bemis/Lisa Coleman, City of Madison Engineering  
Rick Graham WI DATCP, 2811 Agriculture Drive, Madison, WI 53718  
Bill Buckingham, REA, 3510 Parmenter Street, Suite 100, Middleton, WI 53562  
Jennifer Drury Buzecky, Whyte Hirschbeck Dudek S.C. 555 East Wells Street, Suite 1900,  
Milwaukee, WI 53202-3819  
Michael Prager, RR/5

**LEGEND**

- VPIE LIMITS
- NON-EXCAVATED NITROGEN LADEN SOIL BELOW WATER TABLE
- ESTIMATED EXTENT OF GROUNDWATER EXCEEDING NR 140 ES FOR FLUORIDE (4mg/L)
- EXTENT OF GROUNDWATER EXCEEDING NR 140 ES FOR AMMONIA (9.7mg/L)
- ESTIMATED EXTENT OF GROUNDWATER EXCEEDING NR 140 ES FOR NITRATE-NITRATE (10mg/L)
- SOIL MANAGEMENT PLAN AREA

Note: Soil Management Plan for remainder of Site under development, based on proposed land use.



ROYSYER CORNERS  
DEVELOPMENT

REVISIONS	
NO.	REVISION

SHEET TITLE	VPIE LIMITS
DATE	8.18.14
DRAWN BY	DKM
CHECKED BY	DKM
DATE	8.18.14
SHEET NO.	
PROJECT NO.	
JOB NUMBER	
LOCATED BY	DKM
DRAWN BY	DKM
CHECKED BY	DKM
DATE	8.18.14
SHEET NO.	
PROJECT NO.	

ROYSYER CORNERS  
SCALE 1"=80' (@ 24x36)

FOR INFORMATION ONLY

FIGURE 1