

CONTAMINATED MATERIALS MANAGEMENT

External
Advisory
Group

July 9, 2015



WELCOME + UPDATES

- **Introductions**
- **June 25th Issue Definition Calls**
 - **Thank you for your feedback**
 - **Call summaries = problem outlines**

MEETING GOALS

- Provide a clear overview of the issues
- Select workgroups
- Schedule workgroup meetings/calls
- Discuss options for next in-person, full-group meeting

ISSUES

1

- **Is material characterized?**

2

- **Where can material go?**

3

- **How should it be tracked?**

ISSUES BY SUBJECT

- 1. Material Characterization**
- 2. Long-term Stewardship of Relocated Materials**
- 3. Utility, Developer, DOT and Local Government concerns**
- 4. Tracking**

1. MATERIAL CHARACTERIZATION

- Unrestricted vs. Restricted disposal continuum
 - Parameters/Concentrations
 - Sampling methods –compound specific, totals, SPLP
 - Regulatory limits
 - NR 720 RCLs/NR 140/NR 538/other
 - Types of material
 - TOC/clay/sand/waste fill
 - Placement restrictions
 - Large volumes = contaminant loading?

ISSUE: MATERIAL MANAGEMENT

NR 135

UNRESTRICTED

Site-specific
Exemptions
with
restriction

SOME RESTRICTION

Landfill

RESTRICTED

“CLEAN FILL”

- Mine spoils (crushed stone, sand and overburden soils)
- Clean soil
- Brick*
- Building stone*
- Concrete*(may be reinforced)
- Unpainted/untreated wood
- Broken pavement (may include Asphalt or concrete)

* Not “clean fill” if includes lead paint or PCB contamination

ISSUE: MATERIAL MANAGEMENT

← Solid Waste →

Clean Soil - EXEMPT

Definition
NO cover
NO Locational
Criteria
NO Long-term
responsibility
—
Sampling
requirements
Liability
Reporting

Contaminated Soil - 718/500/538

Definition
Cover
Locational
Criteria
Tracking
Long-term
responsibility

Licensed Landfill

Definition
Cover
Siting criteria
Tracking
Long-term
responsibility

2. LONG TERM STEWARDSHIP OF RELOCATED MATERIAL

- Restrictions related to receiving site
 - Quantity (loading, cumulative effect)
 - Interim protectiveness during placement
 - Public comment opportunities
- Post-closure requirements
 - Capping
 - Monitoring
 - Future land use/zoning changes
- Future responsibility/liability
 - Financial assurance
 - Insurance
 - Funding source for potential future failures
- Tracking

2. LONG TERM STEWARDSHIP OF RELOCATED MATERIAL

- No restriction
- No cover
- No obligation

Clean?

- Location criteria met
- Shown to be protective
- Possible cover and/or restriction

LHE + NR718?

- Managed by facility guidelines

Licensed Landfill

3. UTILITY, DEVELOPER, DOT, LOCAL GOVERNMENT

- Sampling
 - When to test
 - What to test for
- Conditions that require reporting
- Reporting responsibility
 - In ROW
 - On private property
 - With contractor involvement
- Placement options when contamination is present
 - Process for determining what is acceptable
 - Interim movement – stockpiling/storage/future reuse

4. TRACKING

- Use of BRRTS/SHWIMS
- Requirements for data package
 - Receiving Site Owner Information
 - Receiving Site Diagram/Map
 - Contaminant Information/Sampling Data
 - Generator Information
 - Continuing Obligations Documentation
 - Listing Fees

WORK GROUPS

1. Material Characterization
2. Long-term stewardship of relocated material
3. Utility, Developer, DOT and Local Government concerns
4. Tracking process development

FUTURE MEETINGS

- **Wednesday, September 16th**
 - Waukesha – State Office Building Rm 314
- **Workgroup meetings**
 - Frequency
 - location