



July 11, 2025

FID#405132860
Brown County
SW/Correspondence

Chad Doverspike
Brown County Port and Resource Recovery Department
2561 S Broadway
Green Bay, WI 54304

Subject: Request for Additional Information for Plan of Operation Approval Modification at the Brown County South Landfill, Brown County, License #3565

Dear Mr. Doverspike:

The Department of Natural Resources (department) reviewed the requested “Plan Modification – Filling Plan, Gas Extraction System Layout, and Beneficial Use Soils Acceptance Criteria” (“plan”) for gas extraction system layout and beneficial use soils acceptance criteria at the Brown County South (landfill), (license #3565).

In an effort to provide a joint review, the Waste and Materials Management Program (Waste Program) has contacted the department’s Remediation and Redevelopment Program and Air Management Program. The following additional information is needed from the Waste Program and the Air Program to continue review of the plan. Note that the department’s Remediation and Redevelopment Program does not have additional comments on the proposed plan, at this time.

The Waste Program is requesting the following information:

Gas Extraction System

The plan needs to include narrative explicitly stating what is being modified from the original plan of operation (PLOP). The plan does not explicitly state how the proposed design differs from the original design.

Beneficial Use Soils Acceptance Criteria

The information requested for the beneficial use soils acceptance criteria, below, was also requested in the department’s email on September 10, 2024.

1. Include a copy of the specific parts of the plan of operation or include a summary of the ‘acceptable limits (total limits)’ proposed in the plan of operation.
2. Verify if the proposed standards for contaminated soils acceptance includes dredged soils.
3. Include a revised copy of the Special Waste Plan (if modified) and the Alternative Daily Cover and Beneficial Reuse Plan to include in the proposed modifications.
4. Provide a narrative of any sampling that has been conducted on the soil or sediment, including number of samples, frequency, and results compared against the ch. NR 720, Wis. Adm. Code (NR 720), residual contaminant levels (RCLs), allowable acceptable limits in the Special Waste Plan, as well as toxicity characteristic leaching procedure.

5. Provide a narrative explaining whether the soil/material has been remediated or will go through any type of remediation prior to being brought to site.
6. Include a narrative of the proposed storage/stockpiling, use, and any setback requirements from exterior sideslope for the soil/material that will be used to prevent migration of contaminants from the soils outside the limits of waste.
7. Section NR 506.105(3), Wis. Adm. Code, prohibits the acceptance of soils having an average organic compound concentration exceeding 2,000 milligrams per kilogram (mg/kg), unless managed in accordance with ch. NR 708, Wis. Adm. Code. Discuss how this will be tracked and if this requirement will conflict with the proposed acceptance criteria of ten times the industrial contact limit.

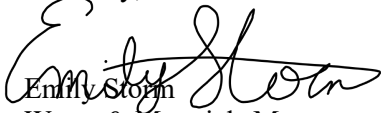
The Air Program is requesting the following information:

1. Provide the Air Management Program a copy of the landfill's Special Waste Plan.
2. Your air pollution control permit applications identify stockpiled contaminated soils as an insignificant source, but do not identify disposal or beneficial use or reuse activities. Were emissions from these activities estimated? If so, please provide those estimates. If not, please provide a date by which the landfill can complete and submit them to the Air Management Program.
3. Explain how and when contaminated soils are tested for organic compounds.
4. Provide records of the amount of contaminated soil disposed of or beneficially used or reused since disposal or beneficial use or reuse began.
5. Provide annual weight records of hazardous air contaminants contained in the contaminated soil that was disposed of or beneficially used or reused.

The information requested above should be submitted as a fully revised report with new text in a different color than the original, or as an addendum. Only an electronic copy of this resubmittal is necessary. The department requests this information to be submitted by **August 25, 2025**.

If you have any questions or concerns regarding this request, please contact Emily Storm at 920-873-0773 or by email at Emily.Storm@wisconsin.gov.

Sincerely,



Emily Storm
Waste & Materials Management Program Engineer
Northeast Region

cc: Ben Hintz –Brown County (benjamin.hintz@browncountywi.gov)
Erin Endsley – DNR/RR (e-copy)
Ryan Bergh –DNR/AM (e-copy)
Kristin DuFresne –DNR/WA (e-copy)
Jackie Marciulionis – DNR/WA (e-copy)