

October 21, 2025

Mr. Kevin Bartel
Wisconsin Department of Natural Resources
Waste & Materials Management Program
2984 Shawano Avenue
Green Bay, WI 54313-6727

**Subject: Additional Information for Request for Low-Hazard Waste Grant of Exemption – Future Dredge Spoils from Chaudoirs Dock County Park Harbor and Entrance Channel
AECOM Project No. 60751170**

Dear Mr. Bartel:

On behalf of Wayne Spritka, Director of Door County Facilities and Parks, AECOM submits the enclosed additional information to supplement the original request for a Low-Hazard Waste Grant of Exemption pursuant to s. 289.43(8), Wis. Stats., and s. NR 500.08(4), Wis. Adm. Code. The exemption is sought for the dredged sediment to be generated in 2026 at Chaudoirs Dock County Park, 1552 County N in the Town of Union, Door County, Wisconsin.

Project Overview

- Generator: Door County Facilities and Parks
- Contact Person: Wayne J. Spritka
Door County Facilities and Parks Director
421 Nebraska St
Sturgeon Bay, WI 54235
920-746-2211
- Type of Waste: Dredge Material. Historic sediment sampling (October 2013) records indicate the material was predominantly silty sand with organic fines. The Sediment Sampling and Analysis Report from November 2013 is provided in Attachment A.
- Origination of Waste Location: Chaudoir's Dock County Park. See Figure 1 for proposed dredging limits)
- Volume & Rate of Production: 10,420 cubic yards total developed at a rate of between 200 and 300 cubic yards per day
- Proposed Disposal/Reuse Location: Old Door County Landfill (Balefill) Site (License #2937) 7129 Hainesville Road, Sturgeon Bay 54235. See Figure 2 (black rectangle) for proposed temporary stockpile location of dredge material. This landfill stopped accepting waste on June 1, 2001, and was closed in September 2001.
- Project Timeframe (anticipated): June 2026 thru August 2026

- Type of Exemption Requested: Landfill slope maintenance whereas the proposed dredge material will be stockpiled at the landfill and used as a slope cover maintenance on an as-need basis. The volume of material (est. 10,420 CY) is anticipated to be used at the landfill over the next 10 years.



Figure 1. Approximate Dredge Area at Chaudoirs Dock County Park



Figure 2. Door County Landfill Dredge Material Temporary Stockpile Location

Justification

We believe this request meets the statutory and regulatory criteria for a low-hazard exemption due to the following:

- The proposed waste consists of dredged sediment transported along the Door County shoreline and deposited in Chaudoir's Dock Harbor through natural processes such as wave action and littoral drift. This sediment originates from Green Bay and is believed to be free from industrial contamination, posing minimal risk to public health or the environment. This assumption is based on 2013 sediment sampling and analysis previously used to support a Landfill Permit Modification (see Attachment B).
- The dredged material will be managed to prevent environmental pollution, in accordance with s. 289.01(8), Wis. Stats.
- Dredging operations will be conducted within an enclosed turbidity barrier. Sediment will be dewatered either on a scow or on harbor property, with drainage contained within the barrier.

- Dewatered sediment will be transported to the landfill using trucks equipped to prevent sediment loss during transit.
- Sediment accumulation has occurred since the last maintenance dredging. Although no new analyses have been conducted, 2013 laboratory testing supported DNR-approved dredging and landfill disposal. The material is still assumed to pose a low risk to health and the environment.
- A 2014 analysis compared landfill elevations at closure with 2013 survey data, identifying approximately 37,800 cubic yards of surface settlement.
- The temporary dredged sediment stockpile will be stabilized using WisDOT seed mix #75 (native grasses). If seeding occurs after September 1, winter wheat or rye will be used instead.
- Supporting documentation includes analytical results, site maps, and proposed sediment management methods to demonstrate compliance with applicable regulations.

Following the teleconference of August 18th, 2025, we understand you require additional information to process this request to re-establish the storage facility for the dredge material. The following items are enclosed with this letter:

- Thematic maps, illustrating proximity of the storage facility to:
 - Floodplains
 - Wetlands
 - Critical Habitat
 - Water Supply Wells
- Dredge Sediment Quality Table with reference to NR720 standards
- Natural Heritage Inventory Preliminary Assessment Screening

We respectfully request the Wisconsin DNR to review the attached proposal and issue a Low-Hazard Waste Grant of Exemption for this project. Please contact Pete Diemer at 920-406-3216 or peter.diemer@aecom.com if you have questions or require additional information during your review.

Thank you for your time and consideration.

Yours sincerely,



Peter J. Diemer, PE, CH
Project Manager
AECOM
T: 920-406-3216
M: 920-660-9293
E: peter.diemer@aecom.com

Attachment A Thematic Maps

Attachment B Dredge Sediment Quality Table with Reference to NR720 Standards

Attachment C Natural Heritage Inventory Preliminary Assessment Screening

I, Pete Diemer, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 500 to 538, Wis. Adm. Code.

Attachment A

Thematic Maps

PROJECT
CHAUDOIRS DOCK COUNTY
PARK HARBOR AND ENTRANCE
CHANNEL DREDGING 2026

CLIENT
DOOR COUNTY PARKS
DEPARTMENT

421 NEBRASKA ST
STURGEON BAY, WI
54235

CONSULTANT
AECOM
444 S Reid Street, Suite 300
De Pere, Wisconsin 54119
www.aecom.com

CHAUDOIRS DOCK HARBOR AND ENTRANCE CHANNEL
DREDGING 2026
DREDGE SPOIL TEMPORARY STOCKPILE
TOPOGRAPHIC MAP

PROJECT NUMBER
60751170

Drawn: VJG 9/25/25
Approved: PJD 9/25/25
Scale: AS SHOWN

Legend

- PROPOSED DREDGE
- SPOIL TEMPORARY STOCKPILE AREA
- USGS CONTOURS
- APPROXIMATE LANDFILL BOUNDARY

N

0 495 990 Feet

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS. (c) OpenStreetMap contributors, and the GIS User Community. Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NIMA, Geodataservice, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS User community

FIGURE 1
TOPOGRAPHIC



PROJECT
CHAUDOIRS DOCK COUNTY
PARK HARBOR AND ENTERANCE
CHANNEL DREDGING 2026

CLIENT
DOOR COUNTY PARKS
DEPARTMENT

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CHAUDOIRS DOCK HARBOR AND ENTRANCE CHANNEL
DREDGING 2026
DREDGE SPOIL TEMPORARY STOCKPILE
CRITICAL HABITAT

PROJECT NUMBER
60751170

Drawn: VJG 9/25/25
Approved: PJD 9/25/25
Scale: AS SHOWN

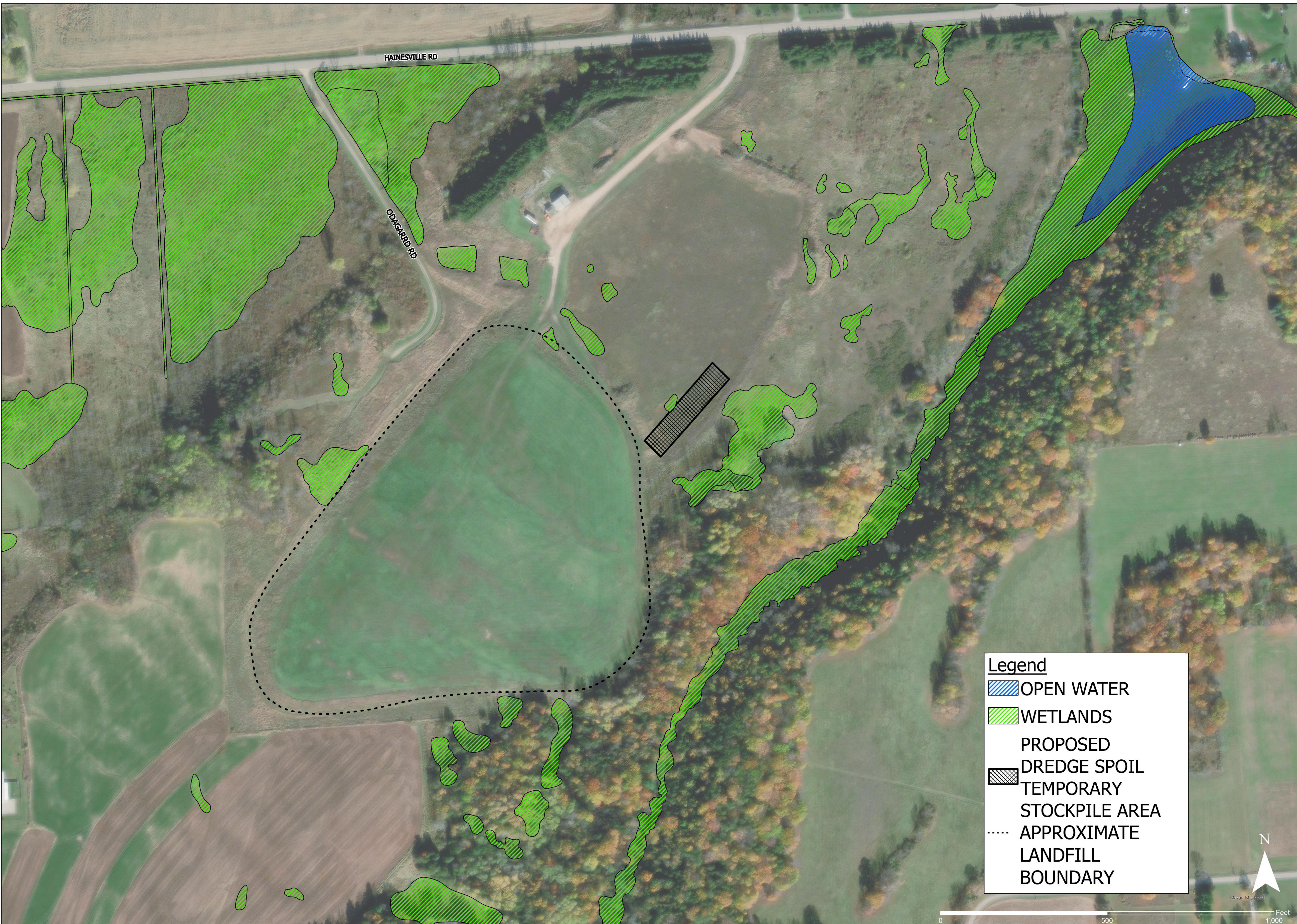
N

FIGURE 2
CRITICAL HABITAT

Legend

- OPEN WATER
- WETLANDS
- PROPOSED DREDGE SPOIL TEMPORARY STOCKPILE AREA
- APPROXIMATE LANDFILL BOUNDARY

0 500 1,000 Feet



PROJECT
CHAUDOIRS DOCK COUNTY
PARK HARBOR AND ENTRANCE
CHANNEL DREDGING 2026

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DOOR COUNTY PARKS
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CHAUDOIRS DOCK HARBOR AND ENTRANCE CHANNEL
DREDGING 2026
DREDGE SPOIL TEMPORARY STOCKPILE
WETLANDS

PROJECT NUMBER
60751170

Drawn: VJG 9/25/25
Approved: PJD 9/25/25
Scale: AS SHOWN

FIGURE 3
WETLANDS



PROJECT
CHAUDOIRS DOCK COUNTY
PARK HARBOR AND ENTERANCE
CHANNEL DREDGING 2026

CLIENT
DOOR COUNTY PARKS
DEPARTMENT

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CHAUDOIRS DOCK HARBOR AND ENTRANCE CHANNEL
DREDGING 2026
DREDGE SPOIL TEMPORARY STOCKPILE
WELLS AND PIEZOMETERS

PROJECT NUMBER
60751170

Drawn: VJG 9/25/25
Approved: PJD 9/25/25
Scale: AS SHOWN

Legend

- △ PIEZOMETER
- ▲ MONITORING WELL
- ▲ POTABLE WELL
- PROPOSED DREDGE SPOIL TEMPORARY STOCKPILE AREA
- - - APPROXIMATE LANDFILL BOUNDARY



0 500 1,000 Feet



FIGURE 4
WELLS AND PIEZOMETERS

Attachment B

Dredge Sediment Quality Table with Reference to NR720 Standards

Table 2
 Sediment Sample Analytical Summary
 Sawyer Creek Channel Improvements
 AECOM Project No. 60281037

Sample ID	Depth below water surface (ft)	CBSQ Guideline Values ^a	Metals (mg/kg)										PAHs (µg/kg)						Other Parameters				
			Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Benz(a)pyrene	Benz(a)anthracene	Benz(b)anthracene	Fluoranthene	Naphthalene	Pyrene	Total PAHs	Total PCBs (µg/kg)	Percent Moisture (%)	Total Organic Carbon (mg/kg)	Mean Total Organic Carbon (mg/kg)				
		Threshold Effect Concentration Midpoint Effect Concentration Probable Effect Concentration	9.8 21.4 33	NE NE NE	0.99 3.0 5.0	43 76.5 110	36 83 130	0.18 0.64 1.1	150 800 1,450	240 6,820 13,400	240 6,820 13,400	423 1,327 2,230	176 369 561	195 858 1,520	1,610 12,205 22,800	60 368 676							
		Non-Industrial DC RCL Industrial DC RCL GW-RCL	0.677 3 0.58	15,300 100,000 165	7.14 99.7 0.75	100,000 (1) 100,000 (1) 3.8	200 800 27	3.13 3.13 0.21	0.115 2.11 0.47	1.15 21.1 0.48	11.5 211 --	2,390 30,100 89	2.4 10.2 0.66	1,790 22,600 55	-- -- --	234 967 9.4							
A-1.1		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	2.4 --	21.9	0.23	J	9.3	7.1	0.053		46.7 21.1	JB				46.7	76.4 34.6	J	51.6	20,400	23,800	22,100	
A-1.2		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	3.3 --	32.5	0.24	J	22.1	8.2	0.031		17.0 4.3	JB				17.0	<37.7 4.3	33.7	44,400	35,300	39,800		
A-2.1		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	2.5 --	22.9	0.22	J	9.3	7.6	0.043	21.1 6.7	JB 19.8	17.6 5.6	J	49.3 15.6	J	43.2 13.6	194.1 61.2	58.5 18.5	J	50.9	33,600	29,900	31,700
A-2.2		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	1.7 --	14.8	0.13	J	5.8	4.4	0.032		13.6 4.9	JB				21.1 7.6	-- --	34.7 12.5	<31.0 --	19.3	27,700	27,600	27,700
A-3.1		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	1.0 --	4.4	<0.065		2.6	1.5	0.013		13.9 30.9	JB					13.9 30.9	<32.4 --	23.0	3,520	5,480	4,500	
A-3.2		Dry Weight Concentration Normalized to 1% TOC for Comparison With CBSQG Values	1.0 --	7.3	0.068	J	3.7	1.9	0.015		14.1 8.7	JB					14.1 8.7	<32.7 --	23.5	17,100	15,400	16,300	

Notes:
 Only detected compounds are listed.

PAHs = Polynuclear Aromatic Hydrocarbons
 PCBs = Polychlorinated Biphenyls

-- = Not detected at or above limit of detection (LOD)

B = Benzo(b)fluoranthene detects biased high due to detections in the associated laboratory method blank.

J = Estimated concentration above the LOD and below the limit of quantitation (LOQ)

NE = Not Established

Note: The dry wt. normalized value for the Total Organic Content (TOC) assumes a 1% TOC content.

^a As referenced in *Consensus-Based Sediment Quality Guidelines, Recommendations for Use & Application Interim Guidance*. WDNR, December 2003; WT-732 2003.

Bold text indicates the normalized concentration is above the Threshold Effect Concentration.

Outlined cells indicate normalized concentration is above the Probable Effect Concentrations

NR 720 Residual Contaminant Levels, per October 2024 RCL spreadsheet, WDNR.

Underline italic indicates a nonindustrial exceedance.

Bold indicates an industrial exceedance.

Shading indicates a GW-RCL exceedance (protection of GW).

(1) screening criteria for Chromium III listed.

Attachment C

Natural Heritage Inventory Preliminary Assessment Screening



Endangered Resources Preliminary Assessment

Created on **10/15/2025**. This report is good for one year after the created date.

DNR staff will be reviewing the ER Preliminary Assessments to verify the results provided by the Public Portal. ER Preliminary Assessments are only valid if the project habitat and waterway-related questions are answered accurately based on current site conditions. If an assessment is deemed invalid, a full ER review may be required even if the assessment indicated otherwise.

Results

A search was conducted of the NHI Portal within a 1-mile buffer (for terrestrial and wetland species) and a 2-mile buffer (for aquatic species) of the project area. Based on these search results, below are your follow-up actions.

Further actions are required to ensure compliance with Wisconsin's Endangered Species Law (s. 29.604 Wis. Stats.) and the Federal Endangered Species Act (16 USC ss 1531-43).

At least one of the following situations apply (likely not all):

- The species recorded are state or federal threatened or endangered animals or the project is within a range or zone.
- The species recorded are state threatened or endangered plants on public land.
- The species recorded are federal threatened or endangered plants on federal land or involve federal funds or a federal permit.

Therefore you should request an Endangered Resources Review <https://dnr.wi.gov/topic/ERReview/Review.html>. An ER Review is the mechanism to ensure compliance with Wisconsin's Endangered Species Law (s. 29.604 Wis. Stats.) and the Federal Endangered Species Act (16 USC ss 1531-43). The ER Review will list the endangered resources that have been recorded within the vicinity of the project area and follow-up actions may be necessary.

A copy of this document can be kept on file and submitted with any other necessary DNR permit applications to show that the need for an ER Review has been met. This notice only addresses endangered resources issues. This notice does not constitute DNR authorization of the proposed project and does not exempt the project from securing necessary permits and approvals from the DNR and/or other permitting authorities.

Project Information

Landowner name	Door County
Project address	7129 Hainesville Road, Sturgeon Bay, WI 54235
Project description	Re-Permit of Dredge Material Storage Facility through Wisconsin's Low Hazard Grant of Exemption process

Project Questions

Does the project involve a public property?	Yes
Is there any federal involvement with the project?	Yes
Is the project a utility, agricultural, forestry or bulk sampling (associated with mining) project?	No
Is the project property in Managed Forest Law or Managed Forest Tax Law?	No
Project involves tree or shrub removal?	No
Is project near (within 300 ft) a waterbody or a shoreline?	No

Is project within a waterbody or along the shoreline?

No

Does the project area (including access routes, staging areas, laydown yards, select sites, source/fill sites, etc.) occur **entirely within** one or more of the following habitats?

Urban/residential	No
Manicured lawn	No
Artificial/paved surface	No
Agricultural land	No
Areas covered in crushed stone or gravel	No

Project Area Maps



The information shown on these maps has been obtained from various sources, and is of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. Users of these maps should confirm the ownership of land through other means in order to avoid trespassing. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>.

<https://dnrx.wisconsin.gov/nhiportal/public>

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