

**From:** Ken Ebbott <kebbott@fehr-graham.com>  
**Sent:** Wednesday, December 7, 2016 12:44 PM  
**To:** DuFresne, Kristin I - DNR  
**Cc:** Ken Ebbott; Gallo, Donald P. DPG (6224); John Butz  
**Subject:** Bay Towel Status and Final Cover Response Requested

Kristin,

Quick update on the Bay Towel project.

We have completed the mixing and treatment with Fenton's and BAM of the soil, and the lab results are pending, should have those by late tomorrow or Friday AM. Just in time- the cold just hit, and it is not fun trying to pump water in sub-freezing conditions. Hopefully those results pass the limits and the landfill can accept them.

We are waiting for lab results on two tested footings concrete samples- should have those today I believe. We've set aside that concrete pending the results, but expect landfill disposal will be needed. There has also been a fair amount of other concrete in other, non-treatment areas of the excavation that we've been landfilling.

We are proceeding now with the excavation and direct disposal soil. There were some perimeter excavation samples that still have elevated levels, and we will be digging further than mapped to try and remove contamination to below direct contact values in the top 4 to 5 feet. Depth to water is about 5 feet, so I anticipate digging to 5 feet to remove as much unsaturated soil as we can get. In the source areas we will be digging to eight feet as planned, to remove mass.

As we backfill and the demolition proceeds to remove the remaining building concrete floor and footings, we need to determine how to finish the ground surface. While we are trying to remove as much contaminant mass as possible, there will be remaining contaminants present above the very low leach to groundwater standards. Not much anyone can economically do about that, with those numbers being so low.

As a result, we believe it is important to have a low permeability ground surface at the site, like a "traffic bond" or DOT 1 ¼ inch compacted gravel surface with a lot of fines that will set up hard. This will be sloped to allow for surface drainage to the adjacent storm sewers, and will prevent precipitation from soak into the ground surface and filling up the permeable compacted granular sand and gravel fill that has been placed at depth. We think this would be a far better option for the site from an environmental remediation standpoint than a topsoil / grass final grade.

Eventually there will be redevelopment of the parcel, and some other surface will be installed, but for now, we would like your agreement that a low permeability gravel surface cover is needed for this site.

**Can you please send an email response indicating you agree with the final surface cover of a compacted gravel?** We need to present information on the site restoration to the City for final permitting, and concurrence with the compacted gravel cover would be helpful.

I'll keep you posted as we make further progress -

Thanks,

Ken Ebbott

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