

From: Ken Ebbott <kebbott@fehr-graham.com>
Sent: Monday, December 12, 2016 5:02 PM
To: DuFresne, Kristin I - DNR; Easterly, Jennifer S - DNR
Cc: Ken Ebbott; Ben Dahlby (bdahlby@wm.com)
Subject: FW: Bay Towel Treated Soil Profile # 126243WI DNR Response tomorrow 8 AM

Kristin and Jennifer,

First off - Thanks to Jennifer for jumping on this - much appreciated.

Second- It sounds like Ben Dahlby of Waste Management needs you to send an email or letter that indicates the treated soil can be accepted by the landfill. **Ben, let me know if the wording below does NOT meet your needs**, and let us all know what would need to be changed to allow for a fast approval once the DNR sends their OK.

In an effort to get it done quickly, knowing you are out of the office, I've taken a stab at the wording. If it meets with your satisfaction, and Ben's needs, perhaps you can just cut and paste this into an email and send it to the interested parties.

Draft Example Wording: (feel free to change - just trying to make this happen quickly)

Treated soil from the Bay Towel remediation project (BRRTS # 02-05-237064) has been tested, and the laboratory analytical results representative of the treated soil from the following sample locations meet the necessary disposal criteria:

I-2, Total PCE 36.3 mg/kg, TCLP PCE 0.025 ug/l

K-2, Total PCE 25.3 mg/kg, TCLP PCE 0.0093 mg/l

The soil represented by these samples has been treated by Fenton's Reagent and B A M. Based on the post-treatment chemistry results, soil from these locations meets the Contained Out Criteria, and the soil is not considered listed hazardous waste.

The TCLP results indicate the treated soil is not characteristically hazardous.

As a result, this material can be discarded at a subtitle D landfill facility.

This determination does not apply to other soil samples of treated soil at the site, represented by soil samples I-1, K-1, Q-1, and Q-2, which will require further steps be taken if disposal at a subtitle D facility is desired.

I look forward to hearing from you and Jennifer tomorrow morning-

Thanks,

Ken

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

From: Dahlby, Benjamin [mailto:bdahlby@wm.com]
Sent: Monday, December 12, 2016 4:07 PM
To: Ken Ebbott <kebbott@fehr-graham.com>
Cc: Heidenreich, Daniel <dheidenr@wm.com>; Roddan, Daniel <droddan1@wm.com>
Subject: RE: Bay Towel Treated Soil Profile # 126243WI DNR Response tomorrow 8 AM

Good afternoon,

We would need confirmation from the DNR a listed code does not apply to the material you are looking to dispose of (Contained out Ruling). Regardless of treatment effectiveness if the material carries a listed F code it would have to go to a hazardous waste landfill. For these types of sites (laundry/dry cleaning solvents) the DNR will usually provide a contained out letter. In some cases the letter will detail which if any areas need to be segregated and sent to an alternate facility.

Ben Dahlby

Waste Approvals Manager
bdahlby@wm.com

Waste Management

W132 N10487 Grant Drive
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From: Ken Ebbott [mailto:kebbott@fehr-graham.com]
Sent: Monday, December 12, 2016 3:57 PM
To: Dahlby, Benjamin <bdahlby@wm.com>
Subject: Bay Towel Treated Soil Profile # 126243WI DNR Response tomorrow 8 AM

Ben,

I believe I will get a reply from the DNR tomorrow morning about being able to accept some of the treated soil.

I need to know what you need to approve it- is a email OK from the WDNR project manager, Kristin DuFresne, acceptable?

I am also in a bind due to the cold weather, and need to line up a contractor to dig and load the material before it freezes solid.

Thanks for letting me know what you need for approval - I anticipate we will get the OK on treated soil represented by samples for I-2 and K2 - about 90 CY - six loads.

I would like to have it hauled tomorrow if possible -

Ken

KENDRICK EBBOTT | P.G. Branch Manager
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