

**From:** [DuFresne, Kristin I - DNR](#)  
**To:** [Ken Ebbott](#); [Ellenbecker, Michael J - DNR](#)  
**Cc:** [John Butz](#); [Gallo, Donald P. DPG \(6224\)](#); [Williams, Michelle L. MLW \(6231\)](#); [Dillon Plamann](#); [DuFresne, Kristin I - DNR](#)  
**Subject:** RE: Bay Towel Green Bay Drycleaner Soil Retreatment Plan with Revised Sampling and Analysis Plan, BRRTS # 02-05-237064  
**Date:** Monday, March 20, 2017 11:06:58 AM

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Ken – Thank you for talking to me earlier today regarding Fehr Graham’s March 9, 2017 submittal for the Bay Towel site. Per our discussion, the DNR requests the following modifications to the submitted proposal:

- Collect and laboratory analyze the confirmation samples after the treated material has had time to cure.
- Collect three grab samples from each box for VOC analysis.
- Collect three grab samples from Box Q for TCLP analysis.
- Collect the grab samples from discrete sample locations/depths within each box. Do not composite the samples.
- To minimize DNR review and response time, please try to determine whether or not the landfill will require a letter from the DNR regarding the disposal of the treated material at a Subtitle D landfill. If a letter is required, please let the DNR know ahead of time (if possible) and provide the DNR with the appropriate fee.

Thank you for your cooperation and feel free to contact me if you have any questions.

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**Kristin DuFresne**

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**From:** Ken Ebbott [mailto:kebbott@fehr-graham.com]  
**Sent:** Thursday, March 09, 2017 2:19 PM  
**To:** DuFresne, Kristin I - DNR; Ellenbecker, Michael J - DNR  
**Cc:** John Butz; Gallo, Donald P. DPG (6224); Williams, Michelle L. MLW (6231); Ken Ebbott; Dillon Plamann  
**Subject:** Bay Towel Green Bay Drycleaner Soil Retreatment Plan with Revised Sampling and Analysis Plan, BRRTS # 02-05-237064

Kristin and Mike,

Bay Towel is back...

As I indicated in an earlier email, we tested and found we need to retreat the seven 30 CY boxes of treated soil. We did a second treatment assessment using a sample of the worst soil in the boxes, and the attached report includes the findings and plan of action.

Summary: The retreatment plan is to mix more BAM, using a finer grind with a slightly different formulation, as that worked well in the treatability study. Details are in the report.

I assume this plan is acceptable from a logistics standpoint - it's the same material we added previously, and the work is being done in above-ground containerized vessels, so I don't think there are any new issues that would be raised by this proposed additional treatment. I will contact the City to inform them of this work, just to be proactive.

#### Highlights and Approval / Agreement Request

Items I need you to be aware of, and concur with, are below:

1. Retreated soil sample quantity - will the proposed be acceptable? The report includes all historic treated soil test results, broken down on the tables by soil origination areas I, K, and Q.

We will keep these areas segregated going forward, and basically the post-treatment plan I proposed includes the following:

- 1 sample from each 30 CY box from Areas I and K- that will be 6 boxes. Test for Total VOCs.
  - 3 samples from the one 30CY box from Area Q - it historically had the highest levels and also failed TCLP. Test all 3 samples for Total VOCs, and one sample for TCLP.
2. Retreated soil sampling method - is this method acceptable? I hesitate to go with a hand auger, as it might just come up empty due to the muddy nature of the treated soil. I think it best to get a representative sample to use the backhoe bucket. That would be done the day of mixing - once we consider a box fully mixed, we'd get 5 locations in the box sampled using the backhoe bucket, and then test that one sample 48 hours later - to mimic the situation in the box. We want to let the soil react for 48 hours before sampling for lab. Testing by Pace - hurry up turn.
  3. Interpretation and processing of the Retreated soil Results in an Expedited Manner - can you flip an approval relatively quickly - a day or so? if we provide results that indicate the retreated soil meets the criteria. If we pass the criteria - total VOC < 60 mg/kg for the six boxes from Area I and K, and < 60 mg/kg total VOC and passing TCLP from Area Q - we'd need you to send something relatively quickly saying the soil is OK to be discarded at a subtitle D landfill- or whatever language the Landfill- WMI Ridgeview Landfill in Whitelaw - will need to accept. We then can haul it and FINALLY be done with this mess.

Thanks for the reply -

Ken

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

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