

From: Gielniewski, Margaret
To: Paulson.Robert
Cc: [Brian F Bartoszek \(BFBartoszek@integrysgroup.com\)](mailto:Brian.F.Bartoszek@integrysgroup.com); [Adler, Kevin](mailto:Adler.Kevin); [DuFresne, Kristin I - DNR](mailto:DuFresne.Kristin.I@DNR); [Fitzpatrick, William - DNR](mailto:Fitzpatrick.William@DNR); [Killian, James - DNR](mailto:Killian.James@DNR); [Bougie, Cheryl - DNR](mailto:Bougie.Cheryl@DNR); [Bayer, Regina/MKE](mailto:Bayer.Regina@MKE); huck.raddemann@ch2m.com; [Jennifer Knoepfle](mailto:Jennifer.Knoepfle); [Jennifer Hagen \(jhagen@naturalrt.com\)](mailto:jhagen@naturalrt.com)
Subject: RE: LFRR-17-0072 MGP South Focus Area Draft Concept Dredge Designs
Date: Thursday, August 3, 2017 10:20:48 AM

Hello Bob,

I am Cc-ing Brian and Kevin because we need them to tag-in for us during our absences in August.

The first words that comes to mind with this submittal is: incomplete.

The design images do not have context; we need a clear report documenting the rationale for what was presented (inclusive of all the recent data collected) and to answer the following:

- a. When is dredging scheduled to begin/duration?
 - i. When will Wisconsin DNR permit equivalencies be filed (with a minimum of a work plan and schedule)?
- b. Why was the chemistry from the samples we collected in fall and spring, based on data needs assessed during the October 2016 meeting, separated from the development of the cut lines presented in these design images?
 - i. Cut lines exclude NAPL found in clay (vertical extent).
- c. Why are the remedial goals from April 2017 discounted (remove NAPL)?
 - i. What is the rationale for leaving NAPL in the clay layer?
 - ii. Why are the technical limits of the equipment mobilized for PCB-dredging dictating the project goals/end results for PAH-removal?
 1. What is the risk management plan for addressing a new surface where NAPL may be released from exposed clay (contingency plan)?

Additional request for support documentation can be found below, in Bob's July 28 email, **in red font**.

Reminder: EPA and DNR need sufficient review time for submittals; one week turn-around-time should not be expected. It is not EPA's or DNR's intent to hold up the dredging; however, we've voiced our needs for detailed submittals and our necessary review time during all of the group meetings. Get us documents for review as much in advance as possible. With dredging set to begin in September or October, there is NOT sufficient review time being allotted.

Additional deficiencies will be provided by Tuesday, August 8.

Best regards,

Margaret

Reminder:

Gielniewski Out of Office: August 4-7 and August 10-18

Paulson Out of Office: August 7-13(?)

From: Paulson.Robert [mailto:Robert.Paulson@we-energies.com]

Sent: Friday, July 28, 2017 4:15 PM

To: Gielniewski, Margaret <gielniewski.margaret@epa.gov>

Subject: FW: LFRR-17-0072 MGP South Focus Area Draft Concept Dredge Designs

Hello Margaret,

At long last I can provide you some detail for at least the south focus area in Green Bay.

If you and your team could take a look at this and provide any **initial comments** by Friday that would be appreciated. This is not the final sign off for this area but mostly to address any big ticket issues while the details are assembled ahead of an all hands meeting.

Bottom line is the dredge cut line is at either 80 ppm TPAH13 or the higher elevation of the bottom of observed NAPL or the top of the native clay. In some instances there was some NAPL seams or blebs observed lower in the native clay, for instance core S-F4 and S-F6 in cross section MGP-XS-A. As native clay cannot be removed with the hydraulic dredge the plan is to leave the areas with NAPL in the clay in place recognizing that 1) the residual NAPL seams/blebs are extremely small (**provide supporting data**); 2) they account for very little residual mass (**what is the mass?**); 3) are primarily at depth (**provide supporting data**); and 4) the entire dredge footprint will act as a sediment trap and fill with essentially transported sediment from upstream (**provide supporting data**). On top of that, post dredging confirmation sampling (**what is the final post-dredging sample plan?**) for PAHs will **demonstrate if our target of a 35 ppm TPAH13 SWAC** is achieved with the option of placing a sand cover where necessary and a 5 year review can confirm the sedimentation within the dredge footprint.

I do not know when the **plan for the north focus area will be developed** so I am also attaching a 3D model of both areas that will give you some insight and appreciation for the magnitude of the issue in the north area.

I would very much appreciate a half hour of your time before noon on Thursday to at least talk to you about this as after that I will be totally off the grid until Aug. 13th for my daughter's wedding.

Best Regards,
Bob

From: Willant, George [mailto:George.Willant@tetrattech.com]

Sent: Friday, July 28, 2017 1:37 PM

To: Jeffrey Lawson; Susan O'Connell; Bryan Heath; Bartoszek.Brian F; Paulson.Robert

Cc: Coleman, Bill; Boreen, Lee; Blackmar, Terri; Tabatabai, Morey; ECI.LFRR Project Correspondence; Wagner, Corey; Troy Gawronski; Dan Binkney; Paul LaRosa; Feeney, Richard

Subject: RE: LFRR-17-0072 MGP South Focus Area Draft Concept Dredge Designs

To All,

Attached are the Draft Concept Dredge Designs for your review and comment.

Bob my understanding is that you will pass this on to the EPA if you think it necessary at this point.

We are requesting comments, including any from EPA, by no later than next Friday August 4, 2017.

Any questions, please contact me.

Thanks
George

George M. Willant PMP | Vice President/Program Manager

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