

From: [Fitzpatrick, William - DNR](#)
To: [Gielniewski, Margaret](#); [DuFresne, Kristin I - DNR](#)
Cc: [Bougie, Cheryl - DNR](#); [Kincaid, Gary W - DNR](#); [Olson, Beth J - DNR](#)
Subject: RE: LFRR-17-0072 MGP South Focus Area Draft Concept Dredge Designs
Date: Monday, August 7, 2017 3:25:50 PM

Margaret

The RP has had years to design for the upcoming end-of-season dredging at the Green Bay MGP site. Last week we received proposed cutlines for a portion of the site (i.e. south focus area) without the context of a work plan and asked to review and respond in a week. The fact that additional data on the extent of the NAPL (in sediment, shoreline and upland) was gathered in 2017 does not mean that the work plan and permit applications could not have been prepared and submitted months ago. We are potentially weeks away from the proposed dredging and we do not have the necessary documentation for a proper review.

We spent a lot of time last October helping to review and refine the PAH chemistry cross sections and cut lines. While we do have new info on the distribution of the NAPL we don't see how the chemistry and NAPL info has been incorporated into the latest cross sections. The NAPL mapping was completed in June, we haven't seen a report on this work.

Our initial comments on the cross sections:

- There are cores that are labeled as containing NAPL in sediment that are excluded from the proposed dredging (e.g., S-N1, S-IU, S-LU).
- The cut lines should be set based on both chemistry results and the visual NAPL observations; there is no way to confirm this in the cross sections submitted.
- The cross section legend calls out the "LLFR PCB OD Model" but this information does not appear on the cross sections. The PCB cut lines should appear on the proposed MGP cut lines.
- Cross section MGP-XS-F shows a text box pointing to a line for the PCB dredging that appears to show a 3 foot cut into the modeled clay layer which WE Energy claims that the hydraulic dredge can't remove the clay.

Our initial comments on the RP's email that transmitted the cross sections:

The We Energy proposed remedial goals are not numbers that we have agreed on and are well above values that the agencies have proposed. (Refer to the DNR's April 25, 2017 memo to EPA regarding proposed cleanup criteria for the Green Bay and Manitowoc MGP sites for additional information.) We Energy has dismissed COCs in the clay layer as insignificant and can't be removed with the PCB cleanup related equipment. This claim has not been demonstrated based on the risk to the environment, the difficulty of removal, or the significance of the NAPL. We believe there are alternative remedial technologies that could be utilized to remove the COCs in the clay layer.

For a project of this size and complexity the agencies should not have to review the design piecemeal. We need a work plan for the overall site and specific details of what is being proposed in 2017 and beyond in the context of what we know about the MGP waste in the terrestrial and in the waterway. This would include the results of investigative work recently performed for both sediment chemistry, sediment NAPL, shoreline, and upland.

Some elements (noninclusive) that should be in a project work plan:

- Details on the entire project scope (i.e. south focus area, north focus area, etc...)
- Overall project schedule for 2017 and beyond
- Remaining design tasks
- remedial action objectives and cleanup levels
- description of the remedial action
- details on what is to be removed
- dredging methods, equipment selection and contingencies
- pre-construction sampling, confirmation sampling/ field sampling plan/laboratory
- residual management
- environmental controls - including water quality barriers
- monitoring for air and water quality
- erosion control and storm water management
- debris management
- site staging
- contingencies for the potential exposure of high concentration COCs post dredging
- contingencies related to sheet pile wall stability and/or rip rap removal
- the integration of the sediment chemistry and NAPL observations
- Proposed cut lines and rational
- Waste removal, handling, processing and disposal
- List of local, state, federal permits/ permit equivalencies and schedule for submittal, review, approval
- Compliance with ARARs including the state Spills Law
- Construction quality assurance
- Waste water handling & treatment
- On-site and off-site material management, transportation and disposal
- Contingencies for equipment (e.g., Vic Vac)
- Contingencies if the Fox River Clean Up Processing Facility is unable to take material for processing (sediment & waste water)
- Weather considerations if project extends into the colder weather season; winter shutdown plans.
- Planned public outreach/notification activities

If you have any questions or would like to discuss this further please let us know. If you believe these comments are helpful, feel free to share with the RP.

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Bill Fitzpatrick, P.E., P.G.

Engineer- Remediation & Redevelopment Program

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William.Fitzpatrick@Wisconsin.gov

From: Gielniewski, Margaret [mailto:gielniewski.margaret@epa.gov]

Sent: Monday, July 31, 2017 3:38 PM

To: Jennifer Knoepfle; DuFresne, Kristin I - DNR

Cc: Bougie, Cheryl - DNR; Fitzpatrick, William - DNR

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

Hi all,

Please take a look and let me know if you have any comments by COB Monday, August 7.

Thanks for your input!

Best regards,
Margaret

From: Paulson.Robert <Robert.Paulson@we-energies.com>

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

To: Gielniewski, Margaret

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; 2) they account for very little residual mass; 3) are primarily at depth; and 4) the entire dredge footprint will act as a sediment trap and fill with essentially transported sediment from upstream. On top of that, post dredging confirmation sampling 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@tetratech.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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