

**From:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Sent:** Friday, October 20, 2017 2:54 PM  
**To:** Paulson, Robert  
**Cc:** Adler, Kevin; Brian F Bartoszek (BFBartoszek@integrysgroup.com)  
**Subject:** FW: Green Bay - NAPL Mobility Testing Location Substitutions/Review and Meeting Notes

Hello Bob,

EPA and DNR want WPSC to hold off on the NAPL testing until a proper SAP is prepared\*, reviewed, and comments are resolved. The proposed NAPL work **is not** time critical\*\*. The sampling can be done later in 2017 or early in 2018 to guide the development of the final dredge cutlines for the fall of 2018 dredging. Once a SAP is prepared, adequate time should be allotted for Agency review.

Earlier this week, the EPA and DNR were asked to review a WPSC proposal for sampling. Late Monday, the proposal for sampling for NAPL mobility testing was sent out. The proposal was 4 paragraphs contained in an Outlook meeting invite where the 3D model and the Tetra Tech cross sections were referenced as the info WPSC relied upon for selecting the core locations. WPSC indicated they wanted to start sampling Thursday because they located a different sampling rig (and different drill type) with availability. Upon evaluation of the information provided for review, even with the request to hold off sampling from Thursday to Monday, EPA and DNR do not have adequate information to clearly document the scope of the proposed investigation, the collection and analysis methods, or the intended use of the collected information. Although the information may in fact be available to represent that required for the SAP, it is spread out in dozens of emails and attachments with partial reference to work performed elsewhere and references to comments from CH2M. The sampling methods were switched out in just the last week without any evaluation of the effects of the change.

The proposed study is intended to evaluate if NAPL can be left behind and still have a protective remedy. We are receptive to this idea if a case can be made that limited removal is protective. The proposed NAPL mobility study is intended to inform that decision. We have concerns that could readily be addressed in a complete SAP. These include information that clearly identifies the work that is proposed, the field and lab methods, and how the data will be interpreted. The lab analysis methods and information about how and where the testing will be completed should also be included. The SAP should make the case for the sample locations and provide the supporting info (core logs, cross sections, chemistry data, etc.). Finally, the SAP should provide criteria for decisions and justification based on supporting info. If this information has been provided, it cannot be readily identified and/or easily referenced back to a source document.

No sediment removal work is proposed until the end of the construction season next year. A SAP of acceptable quality is required to support Agency decision making prior to providing concurrence. The mix of pieces that are currently in house for review in lieu of a SAP are not sufficient to meet the needs of the project and sampling should not begin on October 23.

Please keep me apprised of when a complete, site-specific SAP will be available.

Best regards,  
Margaret

\*Copy and paste elements from your existing work plans to make ONE cohesive, site-specific document. EPA and DNR do not want to assume what you want us to glean from pre-existing documents, or to make assumptions about the rest of the information that is not provided.

\*\*This is not an Emergency Response; therefore, EPA needs proper documentation for decision-making BEFORE work commences. We all certainly want to see the work get underway (and completed in Fall 2018), and will continue to prioritize and expedite Green Bay-related work.