

## Schmenk, Colin R - DNR

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**From:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Sent:** Friday, October 27, 2017 3:50 PM  
**To:** Heath, Bryan  
**Cc:** Kincaid, Gary W - DNR; Paulson, Robert; Bartoszek, Brian F; Fassbender, Judy L - DNR; Adler, Kevin; DuFresne, Kristin I - DNR; Fitzpatrick, William - DNR; Killian, James - DNR  
**Subject:** RE: Cancel NAPL mobility core collection next week.

Bryan,

You can discuss your proposal on Tuesday during our scheduled meeting time.

Best regards,  
Margaret

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**From:** Heath, Bryan [mailto:Bryan.Heath@ncr.com]  
**Sent:** Friday, October 27, 2017 3:33 PM  
**To:** Gielniewski, Margaret <gielniewski.margaret@epa.gov>  
**Cc:** Kincaid, Gary W - DNR <Gary.Kincaid@wisconsin.gov>; Paulson, Robert <Robert.Paulson@we-energies.com>; Bartoszek, Brian F <BFBartoszek@integrysgroup.com>  
**Subject:** FW: Cancel NAPL mobility core collection next week.

Hi Margaret,

I wanted to see if you would have time to discuss the schedule for collecting cores for the mobility analysis with WPS and myself as we contend that the NAPL mobility information you seek is the critical path to completing the MGP remediation in 2018. There are many tasks that need to be completed in order to implement the remedy in the north and south focus areas. These include preparation and approval of remedial designs and a turbidity containment system design, and contracting and procurement of materials. We currently estimate that these tasks will take about 8 months. That means that, in order to complete the work in the two focus areas in 2018, we will need to begin the design work in January 2018. One of the key data needs for both the remedial design and the turbidity containment system design is understanding the mobility of the DNAPL that may be left in place. This information will help inform the cap and turbidity containment designs in both focus areas.

As I understand it, the mobility analyses can take 6-8 weeks to complete. That means that, if we do not collect the mobility cores in November, we will risk not completing the designs in time to do the remedial work in 2018. Doing the remedial work in 2018 is critical if we are to take advantage of the opportunity to remove MGP-related material during the Fox River PCB project. The Fox River project is already behind a consent-decree-mandated deadline; as a result, if we are unable to address the two focus areas in 2018, we may have to forgo the opportunity to address MGP material and plan, instead, to dredge to the PCB action level and apply a temporary cover to protect the areas until a later remedial action for the MGP material. We would be disappointed to miss that opportunity.

I understand that the driller has availability the week of November 13 to collect cores. Perhaps we could talk in the next day or two, and then have a workgroup meeting next week to focus on the mobility cores. This may be a more efficient way to get you the information you need for approval, rather than assembling a formal SAP.

If you could let me know your availability, I would appreciate it. Please also feel free to call me at 678-808-6061.

Regards, Bryan



**Bryan Heath**

Manager, EHS  
Law Department  
678-808-6061

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**From:** Paulson, Robert [<mailto:Robert.Paulson@we-energies.com>]  
**Sent:** Friday, October 20, 2017 3:58 PM  
**To:** Bartoszek, Brian F <[BFBartoszek@integrysgroup.com](mailto:BFBartoszek@integrysgroup.com)>; Coleman, Bill ([Bill.Coleman@tetrattech.com](mailto:Bill.Coleman@tetrattech.com)) <[Bill.Coleman@tetrattech.com](mailto:Bill.Coleman@tetrattech.com)>; Lysne, Bjorn <[Bjorn.Lysne@tetrattech.com](mailto:Bjorn.Lysne@tetrattech.com)>; Jennifer Hagen <[Jennifer.Hagen@obg.com](mailto:Jennifer.Hagen@obg.com)>; Eric Hritsuk <[Eric.Hritsuk@obg.com](mailto:Eric.Hritsuk@obg.com)>; Heath, Bryan <[Bryan.Heath@ncr.com](mailto:Bryan.Heath@ncr.com)>  
**Subject:** Cancel NAPL mobility core collection next week.

FYI. NO GO ON MONDAY.

Bob

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**From:** Gielniewski, Margaret [<mailto:gielniewski.margaret@epa.gov>]  
**Sent:** Friday, October 20, 2017 2:54 PM  
**To:** Paulson, Robert  
**Cc:** Adler, Kevin; Bartoszek, Brian F  
**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.

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