

Willkom, Mae - DNR

From: Willkom, Mae - DNR
Sent: Tuesday, September 25, 2018 2:29 PM
To: 'Miller, Anthony W.'
Cc: Myers, Will M - DNR
Subject: RE: Pilot Test Results/Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

The WPDES permit Woody issued was for “short-duration” only, so he does intend to issue a new, separate permit for the full-scale injection. Woody tells me there have been some changes in how the Wastewater program goes about things, so I have copied him here, and you can correspond directly with him about how to negotiate that permit process.

With regard to changes in implementation, Section B of the temporary exemption approval issued on April 25, 2018 contains language regarding increases in the mass and volume of media injected, as well as the type of remediation media used in the injection points:

13. Any significant changes based on information from the injection groundwater monitoring reports or results shall be submitted to the DNR for approval prior to the changes being implemented at the WRR Environmental Services site. This includes, but is not limited to, adjustments to the volume/mass of the media injected, additional injection points, number of injection events, and/or changes in the type of remediation media used in the injection points.

The exemption approval has an expiration date of 5 years from the date of issue, so a new exemption approval should not need to be re-issued for the types of changes you describe. However, as required by the existing approval, you will need to submit detailed information to me on the nature of the proposed changes prior to implementing them. Given your proposed timeframe, I will expedite my review and will respond by email to document whether the Department concurs with the changes.

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Mae E. Willkom

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mae.willkom@wi.gov

From: Miller, Anthony W. <awmiller@GFNET.com>
Sent: Tuesday, September 25, 2018 12:58 PM
To: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Subject: Pilot Test Results/Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

Mae -

Thanks for the info – I’ll let everybody know that we can quit sending GEMS reports to you.

I will call you in a few minutes to discuss the upcoming full-scale injections scheduled for the weeks of October 15th and 22nd. Basically, I am working on a report that we will send you next week that summarizes the pilot-test injections and post-PT sample results. Basically, things went better than expected and the results are really encouraging (see Figure 3 for the CVOC concentrations measured in wells and borings in and downgradient of the pilot test injection area and Tables 2 and 3 for the preliminary sample results). I sent the results over to our vendor to get the read on what we should use for the full-scale injections and likely won’t know that for another couple of days.

My question to you is: If we decide to increase the mass or volume of what we will be injecting into Area A (as shown on Figure 2), will that require an additional review by you and Woody? We do not plan to inject into Area B in the southeastern portion of the site (as shown on Figure 2) but may conduct additional investigation activities there to narrow down the area that will need to be remediated.

If we decide to use calcium carbonate instead of sodium bicarbonate to adjust the pH, will that require a special/new work plan and permit request?

I will call you later to discuss if I don't get an email from you beforehand.

Anthony W. Miller, P.S.S. | Project Manager | Senior Environmental Scientist
Gannett Fleming, Inc. | 8025 Excelsior Dr., Madison, WI 53717-1900
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From: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Sent: Tuesday, September 25, 2018 12:45 PM
To: Miller, Anthony W. <awmiller@GFNET.com>
Subject: RE: Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

Tony,

I have confirmed that the DNR Waste and Materials Management (WMM) program and Remediation and Redevelopment (RR) program are in concurrence that WRR may entirely discontinue submittal of all sampling data to the GEMS database.

GEMS is essentially a WMM program database and is intended primarily for data from licensed landfills. In addition, all future sampling data from RR sites is now made publicly accessible via upload of report submittals to the Bureau of Remediation and Redevelopment Tracking System (BRRTS) on the Web database.

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Mae E. Willkom
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From: Miller, Anthony W. <awmiller@GFNET.com>
Sent: Tuesday, September 18, 2018 10:49 AM
To: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Subject: RE: Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

Ok – let me know what you find out. That said, unless someone is actively looking at that data, I'd like to refrain from adding the RNA data to the GEMS report. Seems to me that if someone wants to find out about the site, they should be reviewing my wonderfully descriptive reports and be able to review the results in context. Let me know your thoughts.

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From: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>
Sent: Tuesday, September 18, 2018 10:46 AM

To: Miller, Anthony W. <awmiller@GFNET.com>

Subject: RE: Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

GEMS is a Waste program database, and my recollection is that we talked about RR discontinuing WRR's requirement for GEMS reporting entirely. However, I'm double-checking on that.

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Mae E. Willkom

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From: Miller, Anthony W. <awmiller@GFNET.com>

Sent: Monday, September 17, 2018 2:12 PM

To: Willkom, Mae - DNR <Mae.Willkom@wisconsin.gov>

Subject: Inclusion of RNA Field Parameters in GEMS Report - WRR (55929.005)

Mae –

This follows a voice message I just left on your phone. Our contact at Pace asked us if we wanted to include the measurements of the RNA field parameters (DO, OPR, pH, conductivity, temperature) in the GEMS report they are preparing for the samples we collected in and downgradient of the pilot test injection area. Tables with those results will be included in the report we are preparing that summarizes the results of the pilot-test injections and our work plan for full-scale injections. However, let me know if you need to have that data included in the GEMS report.

On a related note, we are tentatively scheduled to conduct the full-scale injections the weeks of October 15th and 22nd. As noted above, we are preparing the report that summarizes the results of the pilot test and work plan for full-scale injections. However, we do not have all of the results of groundwater samples collected on September 9th yet, so we may not be able to send you the report/work plan until the next week. Hopefully, that will give you and Woody enough time to review and approve the work plan before October 15th. Basically, we will only be proposing to inject the reagents already approved into the area in the northern portion of the facility (referred to as Area A on the attached Figure 2 included with the injection permit application/work plan we sent you in February). We don't plan to conduct injections in the southeastern portion of the facility (referred to as Area B on that figure) this year. However, we will likely collect additional soil and groundwater samples in Area B in October if/as time allows and then send in a work plan to conduct injections in that area next year.

Let me know if you need the RNA parameters included with the GEMS report for the samples collected in September in the pilot test area.

Hope you had a good vacation.

Thanks,

Anthony W. Miller, P.S.S. | Project Manager | Senior Environmental Scientist

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