Graham, Joseph R - DNR

From: Galarneau, Stephen G - DNR
Sent: Tuesday, January 31, 2017 7:48 AM

To: Tuchman, Marc; BRENDA JONES (Jones.Brenda@epamail.epa.gov)

Cc: Fassbender, Judy L - DNR; Robinson, John H - DNR; Fitzpatrick, William - DNR; Saari, Christopher A -

DNR; Graham, Joseph R - DNR; Galarneau, Stephen G - DNR

Subject: Crawford Creek FS Legacy Project work assignments WDNR revisions

Attachments: Crawford Creek FS Legacy Project work assignments WDNR revisions Jan 31-2017.docx

Good morning Marc and Brenda.

Please find attached WI DNR's position on the Crawford Creek Legacy Project proposal. If you have any questions please contact us. Now having said that, I will be out of the office pretty much all day today in a meeting but I'm confident that you should be able to reach some of the others as needed.

We'd like to see a project here but need to see things aligned as we indicate in this document to be able to proceed at this time.

steve

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Stephen G. Galarneau

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DNR supports the concept of a Legacy Project for this site but has concerns about the January 26, 2017 proposal by Beazer. In order for the state to support the Legacy project we believe that it is necessary to have GLNPO's contractor in the lead role for the project with respect to analyzing the existing data, evaluation of the sufficiency of the site data, developing a work plan for data collection, overseeing the collection of the data, and the analysis of the remedial options including disposal options. DNR believes that data gaps exist and therefore the project must include a greater budget allotment for data collection to assure that there are sufficient funds to address any site characterization and evaluation data gaps.

DNR proposes the following changes to meet our minimum requirements to proceed with a Legacy Project:

- Raise the budget from \$610k to \$1 million
- Change the cost share from 50%/50% to 65% federal, 35% Beazer
- Reassign key tasks for the FS to the GLNPO contractor as outlined below.

Our change to the cost sharing percentage will result in an increase cost to Beazer of \$45k for the new \$1 million budget (from \$305k under the Beazer proposed \$610k total under a 50/50 split to \$350k for a \$1 million total under a 35%/65% split).

DNR does not support Beazer's proposal to use contract amendments as a method for adjusting the budget can result in unnecessary time delays to implementing the work and uncertainty to the project budget and schedule. There are seasonal constraints to conducting the work in northern WI so streamlining the process where we can benefits all parties.

The FS outline below shows WDNR proposal for assigning work tasks between Beazer's contractor and the GLNPO contractor.

Beazer proposed Feasibility Study outline and work assignments modified by WDNR 1/30/17. Final work assignments will be determined by GLNPO after GLNPO hires a contractor and develops a project work plan.

Proposed Outline/Table of Contents for Focused Feasibility Study for Crawford Creek and Tributary Remediation and Restoration, Superior, WI

(Prepared as a Guide to GLLA Statement of Work Development)

Key:

Yellow shading: To be drafted by GLNPO contractor, with review/input by Beazer, GLNPO, and WDNR Green shading: To be drafted by Beazer, with review/input by GLNPO contractor, GLNPO, and WDNR

* Bold/Italics: To be defined through discussions among Beazer, GLNPO, and WDNR prior to signing GLLA Project Agreement

1. Introduction

2. Purpose/Objectives

- 3. Site Description, Land Use, and History
- 4. Summary of Previous Investigations/Evaluations
- 5.5. Conceptual Site Model Summary Assign to GLNPO contractor
- 6. Remedial Action Objectives/Goals *
- 7. Identification of Media/Areas/Volumes Potentially Requiring Remediation Assign to GLNPO contractor
- 8. Screening of Candidate Remedial Technologies
- Disposal Options Analysis Assign to GLNPO contractor
- 10. Identification/Description of Remedial Alternatives Assign to GLNPO contractor
 - 10.1. Remedial Alternatives for Area A Tributary from Former Kl Property to Crawford Creek Floodplain Assign to GLNPO contractor
 - 10.2. Remedial Alternatives for Area B Tributary within Crawford Creek Floodplain Assign to GLNPO contractor
- 10.3. Remedial Alternatives for Area C Crawford Creek from Tributary to Railroad Embankment 10.4. –

 Assign to GLNPO contractor
- 10.4. Remedial Alternatives for Area D Crawford Creek Downstream of Railroad Embankment Assign to GLNPO contractor
- 11. Identification/Description of Evaluation Criteria 12.

Evaluation of Remedial Alternatives

- 12.1. Detailed Evaluation of Alternatives 12.2.
- Comparative Evaluation of Alternatives 12.3.

Alternatives Evaluation Summary

Tables

Summary of Prior Investigations/Evaluations

Areas and Volumes Potentially Requiring Remediation – Assign to GLNPO contractor

Technology Screening Summary

Potentially Applicable Environmental Laws, Standards and Permits

Summary of Remedial Alternative Preliminary Cost Estimates – Assign to GLNPO contractor

Summary of Comparative Evaluation of Remedial Alternatives

Figures

Site Location Map

Site Plan and Property Ownership/Parcel Boundaries Remediation

Areas/Limits

Figures Depicting each Remedial Alternative

Appendices

Remedial Alternative Preliminary Cost Estimates— Assign to GLNPO contractor