



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF:
SR-6J

SENT VIA ELECTRONIC MAIL

December 13, 2022

Phil Richard
Wisconsin Department of Natural Resources (WDNR)
875 S. 4th Avenue
Park Falls, Wisconsin 54552

RE: Construction Quality Assurance Project Plan for Wetland Excavation and Surface Debris Mitigation at Penta Wood Products Superfund Site, Daniels, Wisconsin

Dear Mr. Richard,

The Environmental Protection Agency (EPA) reviewed the Construction Quality Assurance Project Plan (CQAPP) for Wetland Excavation and Surface Debris Mitigation at Penta Wood Products Superfund Site. Please consider the points outlined in red below and the following recommendation:

- Regarding considerations for assessment and response during the project and verification and acceptance of systems, there should be a discussion in the document (other than sections 5.5 and 5.6) that outlines assessment and resolution of items if the owner's requirements are not found to be met.

With this letter, EPA grants approval of the CQAPP. Please note that EPA is awaiting a QAPP for the confirmation sampling outlined in the CQAPP, which is expected to address data collection associated with source testing for cover soil and excavated materials (geophysical), clay, and confirmation samples (general chemistry).

If you have any questions regarding this approval, please feel free to contact me at 312-353-9529. Thank you.

Sincerely,

X

Celine Wysgalla
Remedial Project Manager, US EPA

USEPA Comment 1

– This section does not indicate qualifications for all involved parties, including the General Contractor, Design Engineer, and Testing Laboratory

Comment: The requested information, including further explanation of the Qualifications required for the General contractor, Design Engineer and Testing laboratory have been addressed in sections 2.3 (Construction Contractor), 2.4 (Design Engineer) and 2.8 (Testing Laboratory) of the CQAP revision. **GHD might consider adding a requirement for the laboratories to be Wisconsin DNR Accredited.**

USEPA Comment 2

– States the Owner may designate an organization or individual to act as the Owner’s Representation but does not define the Representative.

– No organizational chart is provided, and levels of organizational structure is not clearly defined.

– Lines of communication of all parties is not clearly defined.

Comment: Figure 2.1 (page 35) has been added to the revision and adequately identifies the responsible parties and communication pathways.

USEPA Comment 3

– No discussion of training programs, how training will be provided, or personnel responsible for assuring training needs are satisfied and recorded

Comment: Section 2.6 (page 7) has been revised to include the person(s) responsible for assuring training needs have been satisfied and recorded and is found to be sufficient.

USEPA Comment 4

– An overall communication strategy for the project is not presented.

Comment: Section 2.9 (page 7) of the CQAP is now included and outlines the communication strategy and pathways and is found to be sufficient.

USEPA Comment 5

– No discussion of document control procedures.

– No discussion of review criteria to ensure documents are adequate, correct, and complete prior to approval and issuance.

– No discussion of document approval process.

– No discussion of document and record keeping procedures.

Comment: Section 3.1 (page 8) now identifies reports and documents to be maintained (listed in Tables 1.1, 1.2, and 1.3 (pages 24-33), observations to be recorded and types of inspection to be performed.

USEPA Comment 6

– No discussion of design objectives and description of methods used to determine if the objectives are achieved.

– No discussion of establishing and maintaining document procedures to control and verify the design of the project in order to ensure the QA specifications are met.

– No discussion of identification and allocation of resources, including design team professionals.

Comment: GHD responded to this comment that the information is in the previously approved Final Remedial Design Report.

USEPA Comment 7

– *Project and technical organizational interfaces are not identified.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 8

– *Pertinent design characteristics and inputs for the project are not provided.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 9 and USEPA Comment 10

– *No discussion of design output documents.*

– *No discussion of O&M procedures.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.” And that O&M procedures are not applicable to this portion of the project.

USEPA Comment 11

– *No discussion of formal documented reviews of the design.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 12

– *No discussion of design documentation and records.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 13

– *No discussion of design verification process, approval, and documentation.*

– *No discussion of design change and modification process, approval, and documentation.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 14

– *No discussion of site selection and development.*

Comment: GHD response was “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA.”

USEPA Comment 15

– *No discussion of available resources, how they are allocated, and responsibility of resource allocation.*

Comment: GHD states that Section 2.0 of the CQAP includes a discussion of resources. **Unable to determine specific resources currently available for performance of contract work sited in section1 (page5), such as personnel and equipment.**

USEPA Comment 16

– No discussion of contractual arrangements.

Comment: Section 2.10 (page 7) now outlines the process of putting contractual arrangements in place and is found to be acceptable.

USEPA Comment 17

– No discussion of procurement activities.

Comment: Sections 5.5(pages 12-13) and 5.6 (pages 13-14) outline the requirements of the material being procured for clay (section 5.5) and topsoil (section 5.6) as well as the technical requirements and testing required prior to using the materials. This revision is found to be sufficient.

USEPA Comment 18

– No discussion of schedule and tracking.

Comment: GHD states that section 4.2 (page 9) includes discussion of project schedule and tracking. **This section discusses meetings regarding what has happened (progress) in the past period (tracking). The sections do not provide scheduling information indicating proposed schedules for task completion (i.e., Clearing and grubbing, fence removal etc.) which could be included.**

USEPA Comment 19, USEPA Comment 20

– No discussion of cost management.

– No discussion of tracking.

Comment: Discussion of cost tracking and management is now present in section 2.5 (pages 6-7) of the revised CQAP.

USEPA Comment 21

– No discussion of construction certification.

Comment: Section 3.3 discusses the final construction report contain a certification by the CQA that construction meets the requirements of the approved engineering plan.

USEPA Comment 22

– Systems operation and maintenance were outside the scope of the construction QA Plan but should be included in the document referenced in section 1: “Final Remediation Design Report and Contract Plans”

Comment: GHD Response “The Final Remedial Design Report was previously reviewed and approved by WDNR and USEPA and O&M procedures are not applicable to this portion of the project.”

USEPA Comment 23

– Considerations for assessment and response during the project as well as during verification and acceptance of systems. Not discussed in this document.

Comment: GHD response of “Construction of systems is not applicable to this portion of the project.” Is understood however there could be more defined checks and procedures to check accomplishment of tasks (for instance how is to be determined if the Owner’s Requirements are being met. Section 4.1 **Pre-Construction Meeting item 7 simply states owners’ requirements yet there is no discussion in the document (other than sections 5.5 and 5.6) that outlines assessment and resolution of items if the owners’ requirements are not found to be met.**