

Wentland, Thomas A - DNR

From: Wentland, Thomas A - DNR
Sent: Wednesday, May 20, 2015 1:14 PM
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Subject: Sheboygan River - Maryland Ave Sediment Pad Decommissioning Report
Attachments: 2011 Remedial Action Work Plan.pdf; 2006 Remedial Action Work Plan.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Pablo,

I have reviewed the Sediment Pad Decommissioning Report (SME Report) prepared by Keith Egan of Soils and Materials Engineers (SME) as well as the comments from CH2MHill. Hill's comments point out various items in the SME Report that need to be corrected and we agree with the comments but in general it is difficult to comment on the report since it is a after the fact summary of what happened and also somewhat confusing. I do not recall seeing an approved Work Plan for the decommissioning of the dewatering pad. Rather than go back and forth with comments and corrections to the SME Report I strongly recommend that EPA not approve the SME Report since it is not in compliance with an approved scope of work. EPA should direct Pollution Risk Services and Keith Egan to provide a report that complies with the Scope of Work that is contained in the March 2011 Sheboygan River & Harbor Superfund Site, Lower River, Remedial Action Work Plan (RAWP) that was approved by EPA. The Scope of Work can be found on Page 8, Section 5.0 of the RAWP. (copy attached). I am afraid that if EPA approves the SME Report no further investigation and, if necessary, remediation of the Maryland Site will be conducted.

I realize the SME Report addresses only the Maryland Site but the same procedure would apply to the Sheboygan Falls Site. There is an EPA approved Remedial Action Work Plan for this site dated October 2006 (copy attached) which includes a procedure for site decommissioning. That procedure can be found on Page 9, Section 3.0.

Both of these approved Remedial Action Work Plans call for an investigation and, if necessary, remediation in accordance with Wisconsin Administrative Code, Chapter NR 700 series requirements.

It has also been brought to my attention that the Maryland site has a restricted plant species present (Japanese knotweed) and transport/disposal is regulated by Wisconsin Administrative Code, Chapter NR 40. We know that some of the soil that was removed from the site had the knotweed growing in it. Since soil and other material has been removed from the site without an approved plan the material could have been disposed of improperly. To avoid this in the future the work plan for the site should include an evaluation of plant species to determine the proper means of disposal.

It may be helpful to have a meeting with Keith Egan and Pollution Risk Services to explain what is required by the approved plans for the site.

Thanks for giving me an opportunity to comment, hope to hear from you soon.

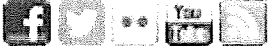
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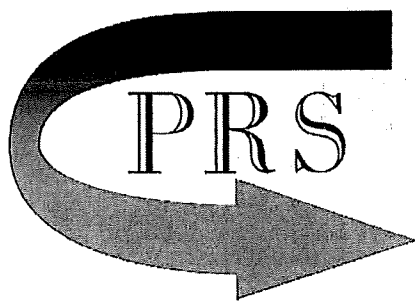
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Pollution
Risk
Services

**Sheboygan River & Harbor Superfund Site
Lower River**

RAWP

March 2011

Remedial Action Work Plan
Sheboygan River and Harbor Superfund Site
Sheboygan County, Wisconsin

March 2011

Prepared By

Pollution Risk Services, LLC



5.0 DE-MOBILIZATION

5.1 *Scope of Work*

The De-mobilization defined work activities are the actions/resources necessary to remove equipment from the river operation, remove the equipment from the de-watering area, and restore the respective areas to the appropriate condition.

Dredging Equipment De Mobilization

The dredge, booster pumps, and maintenance boat will be removed from the river with a crane located at the access east of the boat ramp off of 14th Street near Station 630+00. This area is property owned by the City of Sheboygan. To prepare for the river access, the City of Sheboygan Deputy Director of Public Works has granted PRS river access. Photographs from the mobilization activities will be used to establish the appropriate or needed restoration. Boats will be removed from existing boat ramps located near the 14th Street and 8th Street bridges.

The 8" HDPE Pipe will be removed from the river at the de-watering area, size reduced into manageable lengths, and removed. Again, the mobilization photographs will be used to set the appropriate restoration activity standard.

Dewatering Operation

The dredge slurry operation de-mobilization defined work activities are:

- Dewatering pad will be scraped, broom brushed to clean of PCB sediment, and visually inspected before dismantling. The Preparatory Phase Meeting for the De-mobilization definable work feature will finalize further issues, future use, or requirements.
- Removing, sampling, and disposing of the asphalt and hard fill from the de-watering pad footprint
- Dismantling and removing wastewater treatment plant (WWTP)
- Removing de-watering area fencing
- Dismantling and removing job trailer
- A site assessment in conformance with Wisconsin Administrative Code, ch. NR 700 (NR 700) will be performed on the entire dewatering area property, including paved and unpaved areas. If soil or groundwater contamination is discovered, soil and groundwater will be remediated in conformance with NR 700. Site assessment will include sampling for PCBs, PAHs, and Resource Conservation and Recovery Act (RCRA) heavy metals. If final remediation includes a protective cap, a cap maintenance plan shall be developed in accordance with NR 700.
- Post-construction site survey will be conducted to demonstrate that no changes to the floodplain have occurred and the requirements of NR 116 have been met.

5.2 *Performance Standards*

Performance standards are described below for the de-mobilization.

Remedial Action Work Plan
Sediment Removal
Sheboygan River and Harbor Superfund Site
Sheboygan County, Wisconsin
October 2006

Prepared By

Pollution Risk Services, LLC



3.0 DEMOLITION OF THE DEWATERING FACILITY

The staging/dewatering area is not a permanent structure. Once dredging and excavation operations have ceased, the Geotubes have achieved final dewatering, and the Geotubes and the material they contain have been removed for transport and disposal, demolition of the facility will commence. The Asphalt will be scraped and cleaned. When the determination is made that the dewatering pad has no further use (i.e. Sediment Removal is completed), the asphalt, concrete, and underlying soil will be removed, sampled, and disposed under the guidelines from the State. Concurrently with the dewatering pad removal, the CTF will be demolished. The end use of the property will be determined based on the clean-up criteria established by the State.

Remediation Project Team will perform final backwash and removal of media from the sand filtration units and activated carbon filtration units. The media within the units will be collected, sampled, and disposed at the appropriate landfill. The units and associated pipes, manifolds, and valves will be cleaned, dismantled and stored on-site or at an off-site facility.

The treatment system will not be demobilized until all major activities have been completed. Any water created after the treatment system is demobilized will be collected, contained, and disposed off-site.