

Amadi, Eric A - DNR

From: Amadi, Eric A - DNR
Sent: Friday, January 26, 2018 3:35 PM
To: 'Julie Zimdars'
Subject: Response to Voice Message (Jan. 26, 2016) - Former Wabash Alloys BRRTS# 02-41-553761; Questions on Oct 25, 2017 letter

Hi Julie:

I have received your voice message today (January 26, 2018), regarding the email below. I will get back to you after our conference call (scheduled on February 16, 2018). Let me know if you have questions. Thanks.

Eric

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Eric Amadi

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From: Julie Zimdars [mailto:Julie.Zimdars@obg.com]
Sent: Wednesday, November 22, 2017 10:09 AM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: 'Mike Kellogg (mkellogg@connell-lp.com)' <mkellogg@connell-lp.com>
Subject: Former Wabash Alloys BRRTS# 02-41-553761, Questions on Oct 25, 2017 letter

Eric – Per our conversation, we have a couple questions on the October 25, 2017 letter regarding the SI and RAOR report review:

1. We want to be clear that it is indeed the WDNR R&R program's intent for Connell to place a soil cap over the low level PCB impacts present within the delineated wetland boundary (essentially filling and eliminating a major portion of the wetland on the property). We would like assurance that the R&R program has discussed and gained consensus for the capping with WDNR wetland personnel and Army Corps of Engineer representatives since the wetlands are subject to the Army Corps jurisdictional determination. Recall from the SI report: *a response letter was received from the US Army Corps, dated November 25, 2013, regarding the preliminary jurisdictional determination (JD) and concurrence on the wetland boundary (Appendix L). The letter states "this preliminary JD presumes that all of the aquatic resources identified in the review area are subject to Corps of Engineers' jurisdiction under the Clean Water Act", and confirms that permit authorization issued by the appropriate agencies is required for work that would result in wetland impacts.*
2. Assuming WDNR R&R program confirms the capping concept and elimination of portions of the wetland (per above), Connell would like to revise the RAOR without collecting new sampling data at this stage. The RAOR revisions would reflect the suggested capping requested in the letter (page 6), specifically the additional capping requested on the east side of the property (in wetland and non-wetland areas) due to the exceedances of PCB direct contact RCLs. The revised RAOR will state the intentions of the capping and propose the additional sampling locations (pre-design sampling) that will assist with determining the "designed" PCB cap/cover extents that will be included in the Remedial

Design Report. Also, the revised RAOR will include discussion of the planned pre- and post-excavation sampling and contingency for confirmation results greater than 10 mg/kg total PCBs. We acknowledge the suggested sampling locations in Section A of the letter, and plan to collect these either pre-design or pre-excavation when more accessible (foundations removed).

Thanks for the assistance, Julie



Julie A. Zimdars, PE

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