

Amadi, Eric A - DNR

From: Amadi, Eric A - DNR
Sent: Friday, August 10, 2018 6:08 PM
To: 'Julie Zimdars'
Cc: Mike Kellogg (mkellogg@connell-lp.com); Norman, Michele R - DNR
Subject: RE: Former Wabash Alloys BRRTS# 02-41-553761, Questions on Oct 25, 2017 letter

Hi Julie:

We concur with your proposed plan to revise the RAOR at this point (prepare a Connell RAOR Amendment) and incorporate the WDNR's remedial concepts from the October 25, 2017, letter in efforts to gain approval of the RAOR and agreement on the conceptual remedial approach. After which, we understand that, you will proceed with the pre-design sampling that will refine the remedial limits for capping and excavation, all to be included in the future Remedial Design Report.

Please let me know if you have any questions. Thanks.

Eric

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Eric Amadi

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From: Julie Zimdars [mailto:Julie.Zimdars@obg.com]
Sent: Thursday, August 09, 2018 2:54 PM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Cc: Mike Kellogg (mkellogg@connell-lp.com) <mkellogg@connell-lp.com>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>
Subject: RE: Former Wabash Alloys BRRTS# 02-41-553761, Questions on Oct 25, 2017 letter

Hi Eric – Thank you for the helpful response to our first question regarding the remediation in the wetlands. We are hoping you can provide concurrence to our second question on the RAOR revision. Our thought is to revise the RAOR at this point (prepare a Connell RAOR Amendment) and incorporate the WDNR's remedial concepts from the October 25, 2017 letter in efforts to gain approval of the RAOR and agreement on the conceptual remedial approach. After which, we will proceed with the pre-design sampling that will refine the remedial limits for capping and excavation, all to be included in the future Remedial Design Report.

Please let us know if you agree with this path forward or have further questions on this.
Thanks, Julie



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From: Amadi, Eric A - DNR [<mailto:Eric.Amadi@wisconsin.gov>]
Sent: Wednesday, August 08, 2018 10:55 AM
To: Julie Zimdars <Julie.Zimdars@obg.com>
Cc: Mike Kellogg (mkellogg@connell-lp.com) <mkellogg@connell-lp.com>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>
Subject: RE: Former Wabash Alloys BRRTS# 02-41-553761, Questions on Oct 25, 2017 letter

Hi Julie:

We have recently had discussions with the Wetlands Program regarding the wetlands on this site. The information shared by the Wetlands Program provides input to the questions you asked in your Nov. 2017 email to us. The Wetlands Program has indicated that the on-site wetlands can be disturbed to clean-up the contamination. Remedial options can include excavation within the wetlands and capping/filling of the wetlands with clean soil. Confirmation samples should be collected from any excavation to identify residual concentrations. All of these remedial actions will require wetland permits and mitigation credits may be needed.

Please let me know if you have any questions. Thanks.

Eric

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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



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