

From: Webb, Carrie A - DNR
Sent: Wednesday, November 8, 2023 3:56 PM
To: dean.haen@browncountywi.gov; mark.walter@browncountywi.gov; Bretl, Kyle
Cc: George Berken (george.berken@boldt.com); Gary Kincaid; Ava Grosskopf; Beggs, Tauren R - DNR; Killian, James - DNR; Eifert, Rae-Ann E - DNR
Subject: Modification of superfund caps at former Pulliam site

Hello, the Department is providing the following information to assist you with the submittal required for modification to the superfund caps at the former Pulliam site. These are not all-inclusive comments but are considerations to assist in your submittal. There are some comments below that reference to information from the Chapter 30 permit application. Please note that some of the information submitted in the Ch. 30 application will also need to be submitted for the cap modification and materials management plan.

As a general requirement, companies should consider and address caps as they would any critical utility, e.g., a natural gas line. Any company working around utilities must be very careful. At this point, there are no best management practices (BMPs) or institutional controls for spudding and prop-wash but there are for dredging, which requires Chapter 30 permitting. Any operations that require Chapter 30 permitting need to include requirements limiting spudding and prop-wash in cap areas.

As part of the design planning process, contact with the Responsible Parties (RPs) is mandatory and these communications must be documented. It is important to solicit comments from the RPs because they are currently responsible for overall long-term cap monitoring and maintenance. The main contact for Glatfelter is Bill Hartman (William.Hartman@glatfelter.com) and for Georgia Pacific are Paul Montney (PAMONTNE@GAPAC.com) and Mike Hassett (mike.hassett@gapac.com). The main contact for their consultant Foth is Sharon Kozicki (Sharon.kozicki@foth.com).

Please consider the following:

1. The company(s) performing this work must include design provisions requiring that spudding, barging, prop-wash, and dredging activities cannot take place any closer than 25-feet from any caps. This 25-feet is a requirement unless the company(s) can document that they have the capabilities for better position control that would allow a setback of less than 25-feet. Regardless of which offset the companies propose, the companies must describe the location control and monitoring QA and QC capabilities in detail.
2. If caps are damaged or modified (intentionally or accidentally), then detailed plans with means and methods must be submitted and must include:
 - a. how the environment will be protected from PCB contamination during the action and into the future following completion of the action,
 - b. how contaminated cap and the underlying sediment materials will be removed from the river and appropriately landfilled, if required as part of the action
 - c. how the design engineer and contractor will monitor and ensure protection of the caps during any work near or over the caps,
 - d. how monitoring will be performed pre and post construction and what action will be taken if monitoring indicates unacceptable contamination levels,

- e. any work near and especially over a cap requires that a detailed Pre-Remedial-Action bathymetry survey and a Post-Remedial-Action bathymetry survey be conducted and a separate report documenting any changes/damages to the caps with a schedule to complete the repairs.
3. Other caps exist) between the mobilization sites and the two Pulliam caps which could potentially be negatively impacted during this work. As a result, it is important to identify and manage operations such as barge movements from upstream, downstream or around the Pulliam sites because of prop-wash and spudding from these remote mobilization locations, including the routes/paths of travel taken and their operational controls so as not to damage any caps in these routes/paths of travel.
4. The Cap Operations, Maintenance, and Monitoring Plan (COMMP) will need to be revised to reflect any modifications required by the actions. This will require coordination with the RPs.
5. In addition to the documents submitted as part of the Ch. 30 application, please provide additional information below:
 - a. Additional figures showing the caps that will be affected during this project, including on the design plans.
 - b. A description explaining that part of the project site includes superfund remedial caps that are currently the responsibility of the RPs to monitor and maintain. Any changes require review and approval from the RPs.
 - c. Add narrative that specific Agencies (DNR and USEPA) will review and approve the Pulliam redevelopment plans which will modify and/or impact the superfund caps.
 - d. Add design details and calculations documenting how the short- and long-term stability of the superfund caps will be maintained, and how the superfund caps will be protected, and monitored during construction.
 - e. Reference design considerations associated with the caps. Describe and show the intended use of the area over the boat slip cap CA94. Show what the intended use and associated design loads being considered in the stability assessment calculations and associated design for this area.
 - f. The Ch. 30 application indicates the bulkhead wall sheet pile will be driven by vibratory hammer. Will this vibration, when performed in front (waterward) of the boat slip entrance cap (CA94) bulkhead/ballast, cause instability of that bulkhead? Address this concern in the design.
 - g. The gradation of the fill material is to be submitted to ensure the existing cap armor stone will adequately function as a filter layer. The plan also needs to include detailed "special filling sequence" over the caps and address the cap stability when using vibrating beam to compact granular fill behind new bulkhead wall and on top of the caps.
 - h. Detailed plans of the bulkhead anchoring system need to be submitted. Address anchoring of bulkhead wall east of the boat slip entrance and cap CA94 bulkhead/ballast.
 - i. Is any soft sediment removal anticipated behind the north seawall? Soft sediment may contain PCB concentrations of concern. How will the north seawall be designed to withstand the fill load behind it?
 - j. The contaminant content of the dredged soft sediment needs to be analyzed for characterization and approved by the Department before using as beneficial reuse material west of the bulkhead wall. Describe the proposed sampling and analysis plan.

- k. The Storm Drainage Plan (Figure C-110) in Section 2.11.3.12 of the Chapter 30 application shows the 1st Stormwater Pond located in northwest corner of site, which is potentially over cap CB60. Show how the design factored in stormwater ponds into cap stability calculations. The plan says the 2nd stormwater pond is located in SW portion of site, but Figure 9 in the Chapter 30 application shows it in SE portion of site, and none of it over the boat slip cap area. Show cap CA94 and CB60 locations on figures to clearly indicate what is planned to be developed over the caps.
- l. Section 2.11.3.13: Figure C-110 of the Chapter 30 application shows rail spurs (2) just north of boat slip cap CA94, and potentially over the north intake cap CB60. Show how loading associated with the rail spurs was factored into stability assessment calculations of caps CA94 and CB60. Show cap CA94 and CB60 locations on figures to clearly indicate what is planned to be developed over the caps.
- m. Section 2.11.3.14: Figure C-110 of the Chapter 30 application shows an access road slightly over the north side length of the boat slip. Show how this loading was considered in design stability assessment calculations.
- n. Provide filling sequence design details and calculations associated with the caps.
- o. Plans must be certified by a licensed professional engineer.
- p. Fees will be required for review. Contact the DNR Remediation & Redevelopment Program prior to submitting the cap modification plan for appropriate fees.

Please let me know if you have any questions.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Carrie Webb

Sediment Team Leader – Remediation & Redevelopment

920-843-1014

Carriea.webb@wisconsin.gov