

Comments response summary to the Analysis of Dredged Material Management Alternatives for Milwaukee Estuary Area of Concern

Based on the public comment period held between November 25, 2019 and January 9, 2020
 Prepared by Scott Inman & Carrie Webb

The Alternatives Analysis was developed to evaluate three alternatives for management of contaminated sediment from dredging projects in the Milwaukee Estuary Area of Concern. The Department received 5 responses from the public, and most were in favor of the Department's recommended Alternative 3, a new dredged material management facility. No changes were made to the Alternatives Analysis.

February 2020 – Response to Comments on Alternatives Analysis

Thank you to the individuals that provided feedback on the Department of Natural Resources' Analysis of Dredged Material Management Alternatives for Milwaukee Estuary Area of Concern. The following table summarizes the comments received and the response to comments. Verbatim comments are attached following the comment response summary.

Summary of Comment	Name/Organization	Response to Comment
Interested in the type of contaminants. Mentioned bioremediation and soil roasting.	David Ciepluch	Various contaminants, primarily PCBs and PAHs
Followed up on questions/comments at public meetings regarding making blocks from the sediment. Reached out to Vertase, the company that makes the blocks. Identified concerns: <ul style="list-style-type: none"> degradation over time and re-release contaminant or let off gases 	Juliet Hills	We anticipate that risks posed by long term use of the blocks will be greater than preferred alternative 3. Plus costs and logistics will significantly exceed those of alternative 3.

<ul style="list-style-type: none"> • geotechnical stability and longevity – formulation specific to each site. • Economic and technical challenges using sediment vs. soil - dry, easily transported and handled product. • Sediment dewatering and leachate treatment. • pH shift resulting from cement additives • Added handling including forming, compacting and transporting the product 		
<ol style="list-style-type: none"> 1. Are there any options to treat or remediate the contaminated dredged material in place and not require material relocation? 2. Has the existing Jones Island JI-CDF had any issues or reported problems that need to be considered in the A3 alternative? 3. Overall, I'm supportive of the recommendation of alternative A3 	<p>Bill Morley</p>	<ol style="list-style-type: none"> 1. Yes. There are options to remediate contaminated sediment without relocating it. The most common option for this is sediment capping. Sediment capping involves placing layer(s) of material (sand, gravel, sometimes amendments such as carbon, and armor rock) to keep contamination out of the water column and to reduce the availability to plant and animal life. The appropriateness of sediment capping depends on several things, such as the type, how much, and concentration of the contaminated sediment as well as the suitability of a certain area. An area may not be suitable if there is a high potential for scour from fast moving water or large ship propellers. Areas in the Milwaukee Estuary where sediment capping is expected

		<p>include the Burnham Canal, the Solvay Car Ferry area, and near structures that cannot support dredging, such near bridges, utilities, and sheet pile walls.</p> <p>Future feasibility studies on the Milwaukee and Kinnickinnic Rivers will evaluate when to cap or dredge in detail. The analysis document that was open for comment focused on what to do with the sediment if it is dredged, knowing that there is a substantial amount of sediment contamination in the Milwaukee Estuary. Dredging is the most common sediment remediation technique and will be a key component of future cleanups.</p> <p>2. We believe that issues that the existing Jones Island JI-CDF (existing CDF) may have had are addressable in design. Therefore, no further consideration in the analysis document is needed. For some context, in the 1980's the DNR was concerned with seepage through the perimeter berms. Therefore, the United States Corps of Engineers performed a dye tracer test and monitored the dye concentration on the inside and outside the facility. The test showed some seepage, the most seepage being through the northeast corner. As a result of that study, the United States Corps of Engineers installed a grout filled mattress along the entire alignment of the northern and eastern dikes. Since the grout filled mattress has been installed, the DNR has had no reported issues with the existing CDF. Note that the southern alignment of the existing CDF is a cellular</p>
--	--	--

		cofferdam, a structure of steel sheet pile walls constructed in a circle and filled with aggregate. The dye tracer test showed no seepage through the cellular cofferdams. We are expecting that a new facility would be constructed with cellular cofferdams.
<ul style="list-style-type: none"> • Item 13, page 110 of Milwaukee's Water and Land Use Plan for the Harbor District identifies public space and natural bird and wildlife habitat improvement opportunities for the existing CDF. • Planning and permitting process should consider the end use of the facility • Significant portion should be designed and set aside as habitat sanctuary • Strongly support conclusion of analysis that Alternative 3 (DMMF) is best 	Lilith Fowler, Harbor District	It is up to the City to determine the end use of the facility according the Lakebed Grant issued by the Legislature. Determining future use is not within the Department's authority.
<ul style="list-style-type: none"> • Concerned about 2 pipelines/tubes used for hydraulic dredging (long distance, wind, waves, recreation, monitoring). 	Cheryl Nenn, Milwaukee Riverkeeper	Scott Inman discussed comments directly with Ms. Nenn. Type of dredging, including mechanical dredging has been considered. Success with limited environmental and recreational risks has been documented using pipeline/tubes on similar projects. Final dredging,

<ul style="list-style-type: none">• Mechanical dredging may make more sense in some areas<ul style="list-style-type: none">○ Have costs of trucking and dewatering been considered in areas such as the floodplains?• Need sense of ultimate public use of the site – would like to see it become publicly accessible space.• Interested in more information about how dewatered fluids will be treated prior to discharge to the lake• Interested in how well granular activated carbon work to remove PCBs, PAHs, and PFAS prior to discharge• Provide as many public comment opportunities as possible• Supports Alternative 3 (DMMF)		<p>dewatering, water treatment, and sediment transportation methods will be determined during the design phase. Additional information on granular activated carbon and removal of PCBs, PAHs, and PFAS prior to discharge will be provided in the design documents. More public information opportunities are anticipated. End use of site is up to the City according to Lakebed Grant issued by the legislature.</p>
---	--	---