

**From:** Krueger, Sarah E - DNR  
**Sent:** Friday, April 26, 2024 2:54 PM  
**To:** 'jason.smith@tecumseh.com'; Harvey, Christopher  
**Subject:** SIR Review: HARP Downstream of Hayton Millpond Dam  
**Attachments:** SIR Comments.pdf

Jason,

Please respond to the attached comments and provide an updated Site Investigation Report addressing the comments. To aid review of the updated Site Investigation Report please provide a redline copy of the report. The Site Investigation Report review will be paused, as of today, pending receipt of the response to comments and updated report.  
Please reach out with any questions you have.

Thank you,  
Sarah

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**Sarah Krueger, P.G.**

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DNR Comments on HARP Downstream of the Hayton Millpond Dam Site Investigation Report

1. No discussion of the results of the geomorphic evaluation and poling is provided. The methodology is included in the SIR, but additional discussion related to the findings is necessary to adequately support and justify the conclusions related to impacted sediment. Provide field notes, a description of the size and quantity of depositional areas, bed characteristics, and a figure delineating depositional and erosional areas throughout the targeted sediment poling areas including point bar deposits.
2. Figure 3 includes sediment thickness from the 2023 sediment poling locations and appears to show that some of the targeted poling areas have 3 or fewer sediment thicknesses. The Site Investigation Work Plan indicated that there would be a rod-probe survey “across the cross-section” “every 50 to 100 feet”. Figure 3 must be updated to include all of the sediment probe data which should at a minimum include 3 cross sectional probes every 100 feet within the 5 targeted poling areas.
3. Remove the “Project-Specific RAL Exceedances” from the discussion and tables as they have not been approved for this site.
4. Provide discussion related to the in-channel sample location relative to the deposit. While the thickest sediment deposit was targeted for sampling, describe the sample position in the sediment deposit i.e., sample was from the middle of a mid-channel bar, at the downstream or upstream end, etc.
5. As above, indicate sample position on the point bar i.e., at the water line, at the top, downstream end, etc.
6. Include a discussion related to the estimated mass of PCBs downstream.
7. Provide a conservative delineation of the overbank sampling results including the entire lowland channel and wetland areas exceeding a Wisconsin Admin. Code ch NR 720 Residual Contaminant Level.
8. Provide background sample results for surface water in the table.
9. Fish tissue sampling was not originally included as part of the site investigation work plan. If the fish tissue samples included is necessary to the SIR, then provide appropriate background results in the table and summary statistics.
10. Provide full summary statistics, not just the average, for fish tissue data.
11. Update section 7.6 and conclusions related to potential impacts to resources. There is insufficient information to make a final determination on impacts to human health as there is

still a consumption advisory for this stretch of waterway, nor the northern long-eared bat which could potentially be impacted by macroinvertebrates which have not been evaluated.

12. Update section 8.0 by modifying the statement “unlikely to trigger active remediation and/or monitoring in addition to ...” and rather discuss how continued long-term monitoring of fish tissue, surface water, and sediment will be used to evaluate if additional investigation and or remediation will be necessary.
13. Provide figure(s) with all the historic and current data combined, and if necessary, separate by media, soil, sediment, surface water.
14. The lab data sheets include a lot of data not summarized in the tables as the samples were part of the work for the long-term monitoring effort. The information will still need to be submitted separately for the HARP Site Long Term Monitoring Site.