

DATE: 31 May 2024

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TO: Design Team for C Street GLLA Sediment Remediation  
(Foth, SWL&P, EPA-GLNPO, USACE-DAO, DNR)

FROM: Joe Graham, DNR/Spooner

SUBJECT: DNR Remarks on 30% Design Presentation Items for the C Street Slip GLLA Sediment Remediation, BRRTS #s 02-16-275446 and 11-16-593076, Superior, Wisconsin

The Wisconsin Department of Natural Resources (DNR) participated in the 22 May 2024 30% Design Workshop for the C Street Slip GLLA Sediment Remediation hosted by Superior Water Light & Power (SWL&P) and facilitated by SWL&P’s consultant Foth. We also reviewed the pdf file of the presentation and drawings Foth provided on its Share Point in a folder named 2024-05-22 30% Design Workshop. The purpose of this memo is convey the DNR remarks on the 30% design with the Design Team. Our remarks are presented in the table below. Please let me know if you have any questions.

Item	Location	Remark(s)
Overall Design	NA	Prepare and provide a design report for the remedial action per Wis. Admin. Code NR 724.09.
Specifications	NA	Include certification statement and signature/stamp blocks from Wis. Admin. Code § NR 712.09(3)(a). Final specifications must include Wisconsin PE stamp and signature.
Presentation	Slide 10	After further consideration following the 5/22/2024 meeting, DNR expects to provide a first draft of the decision tree for remedial dredging performance at the C Street Slip for consideration by the design team.
Presentation	Slide 30	Specification Index - Overall What does the blue shading represent for the blue shaded sections?
Presentation	Slide 30	Specification Index – Division 0 - Include section headings for Bidding and Contract Documents
Presentation	Slide 30	Specification Index – Division 1 – Add the following sections: 01 20 00 Price and Payment Procedures 01 25 00 Substitution Procedures (technical submittals for substitution or value engineering – see Pickle Pond example) 01 30 00 Administrative requirements (instead of 01 31 19 to include project meetings, coordination, FTP site, etc.) 01 35 26 Government Safety Requirements 01 35 29.13 Health, Safety, and Emergency Response Procedures for Contaminated Sites 01 45 00 Quality Control - Great Lakes Legacy Act (Meaghan Kern email 5/22/2024) 01 45 29 Testing Laboratory Services – Great Lakes Legacy Act (Meaghan Kern email 5/22/2024) 01 57 19 Temporary Environmental Controls 01 58 00 Project Identification 01 78 00 Closeout Submittals 01 72 00 Decontamination of Personnel and Equipment

Item	Location	Remark(s)
		01 99 90 Listing of Enclosed Documents, Exhibits, and Other Attachments (instead, these items could be listed in the table of contents and kept at the end of the final spec pdf)
Presentation	Slide 30	Specification Index – Division 2 – Add the following sections: 02 21 00 Surveys 02 61 00 Transportation and Disposal of Contaminated Sediment
Presentation	Slide 30	Specification Index – Division 35 – Add the following sections: 35 80 00 Turbidity Barriers (see Pickle Pond for example, there may be some overlap with 01 57 19)
Presentation	Slide 52	Add Treatment System Plan Review and Approval Wis. Stats § 281.41 and Wis. Admin. Code ch. NR 108. (Note - DNR review allowed to take up to 90-days per Wisconsin Law and is usually done faster with complete and conforming submittal)
Presentation	Slide 53	The “No In-Water Work Without Exemption” period is September 15 to July 1. Joe Graham will work to obtain project specific waiver from DNR fisheries and regulatory staff.
Drawings	All	Add an alphanumeric grid to edge of all sheets. Like the Battleship boardgame.
Drawings	All	Keep Approximate Work Areas Limits as shown on relevant sheets. Do not modify per Joe Graham’s remarks at 5/22/2024 meeting. Spoke to Steve Roberts at City on 5/23 about barges.
Drawings	G-001	Suggest title be amended to C Street Slip GLLA Sediment Remediation
Drawings	G-001	Add BRRTS #s 02-16-275446 and 11-16-593076
Drawings	G-001	Given the partnership under GLLA project agreement consider including EPA and DNR under the “prepared for” heading. In addition, make clear who the “owner” is for construction contract administration and identify that entity as such.
Drawings	G-001	Add certification statement from NR 712.09(3)(a)
Drawings	V-101	Check and verify the location of MW-15. It is shown within the CSTP#2 pond.
Drawings	V-101	Verify that soil boring locations along CSTP#2 berm are shown in correct locations. I recall some borings farther to the east than shown.
Drawings	V-101	Add AECOM 2024 boring locations
Drawings	V-101	Show the blue metal structure on WWTP property that is part of upland remedy (near TG-27)
Drawings	V-101	Compare 2019 upland topo with 2024 AECOM survey and update sheet to include relevant features or elevations for adjacent shoreline
Drawings	C-101	Adjust legend background so that it does not overlap rail/gravel road to east
Drawings	C-101	Legend – Add “Potential” before label Haul Route
Drawings	C-101	Legend – Add “Potential” before label of Dredged Material Management Area (DMMA)
Drawings	C-101	Add “Potential” at start of label for the Potential DMMA
Drawings	C-101	Consider showing the alternate Graymont haul route along the dock wall per Duane Dale’s remarks during 5/22/2024 meeting
Drawings	C-104	Add “Potential” to start of label for DMMA
Drawings	C-104	Make lines thicker for the borders of the MGP and Hg DMUs

Item	Location	Remark(s)
Drawings	C-104	Legend – Add purple and red shading to labels for MGP and Hg DMUs
Drawings	C-105	Is it necessary to show BNSF property line on this sheet? Delete label and line if not needed here.
Drawings	C-105	Make lines thicker for the borders of the MGP and Hg DMUs
Drawings	C-109	Sheet Title – Add “Potential” before “DMM Plan”
Drawings	C-109	Show alternate Graymont haul route
Drawings	C-109	Drip pan orientation should be between scow and dock to capture fallback into waterway when transferring material from barge to dock. Drip pans should also be required between dredge plant and scows (details for future sheets C-103 or C-501?).
Drawings	C-110 & C-111	Add match line or sheet reference for transition between sheets/GAC & Intermediate Transfer Sump
Drawings	C-110 & C-111	Add labels and define all symbols and abbreviations. Add legend. Add, “not to scale.” Add pertinent notes on sizing, pump capacities/curves, filter media, etc. Review NR 108, Wis. Stats. 281 and DNR <a href="#">wastewater plan review</a> submittal requirements and modify sheets accordingly.
Drawings	S-101	Include cross-references showing location for detail 1/S-101 on other plan sheets where appropriate.
Drawings	G-002 C-102 C-103 C-106 C-107 C-108 C-112 C-113 C-201 C-202 C-502 C-501 C-502 C-601 C-602	Sheets identified in drawing index on sheet G-001, but not included in the printed copy of the 30% plan set used for our review. Include relevant sheets at appropriate design completion stage for review (60%?).
General	NA	Additional considerations: <ul style="list-style-type: none"> <li>- Include multiple confirmation samples per decision unit for discrete and composite analyses.</li> <li>- Minimize lined area in Dredged Material Management Area (DMMA) and construction water/contaminated contact water in consideration of precipitation events.</li> <li>- Ensure estimation of volume for water treatment and water balance includes storage for reasonably expected storm events (resiliency)</li> <li>- Potential DMMA layout has minimal transloading areas: i.e., from barges to bins and from bins to trucks.</li> <li>- Consider encouraging the beneficial use of treated wastewater in lieu of discharge for dust control, truck/equipment wash water, stabilization make down, etc.</li> </ul>

Item	Location	Remark(s)
		<ul style="list-style-type: none"> <li>- Provide influent flow volumes, influent concentrations, and effluent limits in specs.</li> <li>- Identify management of any filter backwash and consider for water treatment plant (WTP) sizing.</li> <li>- For production estimates, what percent of time is the dredge plant assumed to be active (uptime vs downtime)?</li> <li>- Consider increasing the size of the sump for water storage in lieu of additional tanks.</li> <li>- Rather than intermittent batch operations, the WTP can likely be operated remotely 24 hrs. per day 7 days per week to decrease the size of the WTP, improve efficiency, and prolong media life.</li> <li>- Consider truck availability to haul 500 tons/day and adjust estimated construction time to factor in limitations based on how many trucks can be wrangled on any given day.</li> </ul>