

# DRAFT Dye Pilot Test Draft Scope, Tyco Fire Products LP, Marinette, Wisconsin

PREPARED FOR: USEPA and WDNR  
COPY TO: Tyco  
PREPARED BY: David Mitchell/CH2M and Kyle Winslow/CH2M  
DATE: June 22, 2017  
DOCUMENT CONTROL NO.: 690992.###  
REVISION NO.: DRAFT

This document was prepared to provide Tyco's recommendations for a pilot dye test in the Menominee River to assist in design of the proposed barrier wall dye testing included in the September 2015 *Revised Barrier Wall Groundwater Monitoring Plan Update* (CH2M 2015). Based on feedback from Wisconsin Department of Natural Resources (WDNR), the pilot test would occur following the August 16-18 2017 walleye fishing tournament, with the full-scale barrier wall dye test occurring in summer 2018.

## Background/Rationale for Pilot Dye Test

- WDNR has requested refinement of calculations of potential Rhodamine WT dye concentrations in the Menominee River under a worst-case barrier wall seepage situation.
- Barrier wall dye test design required a number of assumptions including dye fate and transport in groundwater, hypothetical size (flow rates) of groundwater seepage rates through the wall, and dilution and dispersion of dye in the Menominee River. Conducting a pilot dye test in the Menominee River will enable refinement of required dye injection concentrations to achieve a balance between ensuring that a smaller seepage rate would be detectable in the river versus the potential visual impacts from a larger seepage rate.
- Proposed full-scale barrier wall dye testing includes 9 injection locations along the barrier wall in the Main Plant Area (Figure 1).
  - The original proposed Rhodamine WT injection concentrations ranged from 40 parts per million (ppm) to 150 ppm. Based on the Additive Use Approval letter received from WDNR on June 26, 2017 concentrations to be used during the full-scale barrier wall will not exceed the WDNR calculated Secondary Acute Value (SAV) for Keyacid Rhodamine WT Liquid of 64.9 ppm.
  - Sampling in vertical transects adjacent to injection location and 50 ft in either direction at 1-day post-injection, and 2, 4, 8, and 16 weeks post-injection.
  - Proposed monitoring equipment for the full-scale barrier wall test is a 10AU Field Fluorometer (detection limit of 0.01 ppb) and/or an Aquaflor handheld fluorometer (detection limit of 0.4 ppb), with initial screening using a YSI 6820 v2 sonde equipped with a Rhodamine WT detector.
- Key Rhodamine WT concentration values:

- 64.9 ppm: WDNR approved SAV
  - 10 parts per billion (ppb): dye may be visible in a clear reservoir
  - 10 ppb: EPA recommended maximum concentration entering drinking water plant
  - 0.1 ppb: EPA recommended maximum concentration in drinking water and NSF recommended maximum use concentration
- It is anticipated that river flow (circulation) patterns vary between the Main Channel and Turning Basin areas, which would affect the dilution and dispersion of dye in the river.

## Goals of Pilot Test

- Quantitatively and qualitatively assess dispersion and dilution of Rhodamine WT dye released in the Menominee River adjacent to the barrier wall
- Assess suitability of previously proposed fluorometers (10AU Fluorometer and Aquafluor fluorometer) for measuring dye concentrations in surface water samples
- Assess river background fluorescence and potential effects from turbid surface water
- Assess river flow dynamics along barrier wall at proposed injection locations, including in the Main Channel and the Turning Basin
- Model Rhodamine WT dye dispersion in surface water to demonstrate likely downstream extents of dye at concentrations of potential concern in “worst-case” scenario
- Use data collected and model results to refine dye test design, including refining groundwater dye addition concentrations to balance detectability of a low-rate wall seepage rate against surface water impacts from a “worst-case” high-seepage rate scenario

## Proposed Methods

- Microsoft Excel-based model using standard river dispersion equations (Fischer 1979) to assist in design of pilot test (dye addition concentration/volume, deployment locations of fluorometers).
- Measure background fluorescence values in upstream Menominee River locations and in groundwater treatment plant effluent.
- Conduct 3 dye addition tests (see figure for potential dye test locations) to assess flow dynamics and dye dispersion at different locations along the wall by injecting a continuous slug of dye for 15-30 minutes at a known concentration and volume adjacent to the wall. Use submersible fluorometers deployed approximately 100 and 300 feet downstream of release point along two transects (each with a minimum of two fluorometers) to continuously measure dye concentrations through time (response curve). Collect surface water samples for testing/comparison of 10AU Fluorometer and Aquafluor fluorometer. Additionally, qualitatively assess visual extent of Rhodamine WT in river.
  - Test one in Turning Basin (with an additional fluorometer deployed in the South Channel area for this test)
  - Test two along Main Channel
  - Test three near eastern end of barrier wall, deploy submersible fluorometers both along Main channel and in Turning Basin
- Collect river velocity data near wall at dye release point, in the Turning Basin and near the South Channel, and in vicinity of the 9 proposed injection locations, to calculate river dilution potential and assess if different dye concentrations are appropriate at different areas.
- Use the Microsoft Excel-based model, river velocity data, and Rhodamine WT response curves to refine dispersion coefficients. If flow dynamics are deemed too complicated to be assessed by the Microsoft Excel-based model, the U.S. Army Corps of Engineers RMA2 hydraulic model and RMA4 constituent transport model may be used to model flow dynamics and dye concentrations in the area of the Turning Basin and the Main Channel.

- Use the Microsoft Excel-based model and/or RMA2/RMA4 models to model 1) worst-case scenario dye concentrations and 2) low-seepage rate scenario to refine dye injection concentrations and dye sampling strategy for full-scale dye test. Model runs will be conducted using measured river velocity data and the dispersion coefficients calculated from the dye tests. The following modeled information will be provided:
  - Expected river dye concentrations adjacent to seepage location under worst-case (64.9 ppm; SAV) and lower seepage rate scenarios
  - Expected downstream extent of dye concentrations above 10 ppb (visibility limit and recommended maximum concentration entering drinking water plant)
  - Expected downstream extent of dye concentrations above 0.1 ppb (recommended drinking water concentration)

## Considerations

- Concentration and volume of dye added may either be a lower concentration that is less visible or not visible to naked eye but detectable by fluorometer, a concentration similar to proposed injection concentration (64.9 ppm, which would be highly visible), or an intermediate concentration (1 ppm is often the target injection concentration in wastewater outfall/river tracer studies).
- Proposed pilot test will not assess dye behavior in groundwater, so assumptions about groundwater system used in calculations will remain.
- Injection in late summer is preferable because of likely lower river flows during this time, which would reduce the diluting volume of the river and thus the initial dye injection concentration required.

## References

- CH2M HILL. 2015. *Final Revised Barrier Wall Groundwater Monitoring Plan Update*. September.
- Fischer, H. B. 1979. *Mixing in Inland and Coastal Waters*. Academic Press, Inc.: New York, New York.



