

DATE: December 15, 2016

TO: Bay Towel (BRRTS # 02-05-237064) Case File

FROM: Kristin DuFresne – Remediation & Redevelopment Program

SUBJECT: Summary of December 15, 2016 Conversation with Fehr Graham

On December 15, 2016 the Kristin DuFresne, Department of Natural Resources (DNR), contacted Ken Ebbott, Fehr Graham, regarding the Bay Towel site located in Green Bay, Wisconsin. The purpose of the call was to discuss the storage, treatment, sampling, and disposal of hazardous waste generated during recent remedial activities. The following is a summary of the discussion:

- Fehr Graham is aware that the generated material can be stored on-site for 90 days from the date of generation.
  - The DNR is able to grant a 30 day extension.
  - The request for an extension needs to be requested/approved within the 90 day timeframe.
- If needed, the roll-off boxes could be relocated to a licensed TSD for storage/treatment.
  - The intent for moving the roll-off boxes would be to get them into a heated building for sampling/treatment (as appropriate).
  - On-site buildings were recently demolished.
- Fehr Graham is exploring the option of putting a tent up on-site and then heating the tent.
  - This option could be pursued but not a DNR preferred option.
  - Potential issues with security and safety.
- The roll-off box that failed TCLP should either be retreated and resampled or disposed of as hazardous waste.
- Additional samples should be collected from the roll-off boxes that did not fail TCLP or the material should be disposed of as hazardous waste.
  - A total of five representative samples should be collected from each roll-off box.
  - The previously collected composite sample can be counted as one of the five samples.
  - The remaining four samples should be grab samples and collected throughout the roll-off box.
  - Analytical data will be evaluated using TCLP, LDRs, and contained-out.
- Don Gallo and RR have been consulting with Mike Ellenbecker, DNR – Waste and Materials Management Hazardous Waste, regarding this site.
- Fehr Graham will consult Don Gallo regarding the next steps to take.
  - Fehr Graham indicated there may be additional consultation with Mike Ellenbecker regarding how to collect samples and the LDRs (i.e. 10x vs. 90% reduction).
  - DuFresne is willing to participate in conversations.