UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 13, 2017

REPLY TO THE ATTENTION OF:
SR-6J

Mr. Eric Ealy
Environmental Analyst
Xcel Energy
414 Nicollet Mall, MP-04
Minneapolis, Minnesota 55401

RE: EPA comments on the Final Design (100%) for Phase 2 Wet Dredge
Ashland/NSP Lakefront Superfund Site

Dear Mr. Ealy:

The United States Environmental Protection Agency (EPA), in consultation with the Wisconsin Department of Natural Resources (WDNR), has reviewed the Final Design (100%) and the responses to EPA's comments on the 95% Design for Phase 2 Wet Dredge submitted by Foth/Envirocon Joint Venture (FE-JV) on behalf of Northern States Power Company (NSPW), (d.b.a. Xcel Energy). Our comments are shown below.

Monitoring Plan

DMU bathymetry will be available to the Agencies prior to confirmation sampling. This should be reflected in the monitoring plan.

Section 2.2: Last Paragraph, last sentence, please delete, "consistent with the values presented in Appendix B of the Final Design."

Section 2.7.2.2.2, 2nd Bullet has a caveat at the end that states, "only if not already collected for an Alert Level exceedance". Please clarify the purpose of this caveat.

Section 4.2.1, 3rdh Paragraph states "The "best recovery" core should be a minimum of 1 foot. Any lesser best recovery will be discussed with on-site Agency representative for agreement before processing. This is acceptable but be advised that a waiver of the minimum 1-foot requirement will only be granted under **extreme** circumstances.

Section 4.2.2: The first sentence of the last paragraph should include a statement that the random points with be presented to the on-site representative along with the bathymetry.

Section 4.2.3, 2nd Paragraph states "If a final confirmation sediment result does not meet the performance standards and requires additional dredging, two final reconfirmation cores will be

collected, one at the original location and a second at a randomized selected location within the same sample grid, following the additional dredging." This procedure is correct and the procedure should also be included in Section 2.4—Restorative Layer Placement Thickness Verification and SWAC Sampling.

Section 4.3.2, Second to last paragraph: SOP-4 is listed twice, it should read SOP-03 and SOP-04.

Section 4.4: A rate of 1/ 2,000 cubic yards of material is a high rate of sampling given site volumes, or almost every day at 1,200 CY/day. You might want to think about reducing this in negotiations with the landfill.

Section 7.0, 2nd Paragraph states, "...any monitoring of the carbon media, or other operational monitoring activities, are included in the specifications for the carbon treatment system in Appendix H of the *Final Design* and are not part of this *Monitoring Plan."* All monitoring must be included in the Monitoring Plan. It can also be included in the Specifications but it must be included in the Monitoring Plan.

Section 10, Table 10-1. Our understanding of the comments under Water Quality Monitoring Results and 24-hour TWA Air Monitoring Results is that Data Summary/Explanation Write-up will be provided to the Agencies 24 hours and 48 hours, respectively, after receipt of the data by FE-JV. Is that correct?

Design

General comment: Replace all "best efforts" language in main text and monitoring plan with the agreed upon language in the RD/Work Plan with no reference to the number of passes.

General comment: After the 2017 construction season, the agencies will regroup with NSP on any necessary changes or lessons learned in implementation of the Phase 2. Work necessary in 2018 (hopefully restorative layer placement) will be reevaluated at that time. As such, this final design will only be approved for the 2017 season, understanding that not all issues for 2018 are foreseeable at this time.

Section 4.1 – Pg. 17 – Second bullet: Use of the term "selectively" should be dropped. Changes to the barrier system will need to be approved by agencies and not by the responsible party.

Section 4.1, 2nd Paragraph, 5th Bullet states, "The Breakwater and gap areas dual barrier curtain system and the rock protection curtains are planned for removal prior to the onset of lake freeze-over in 2017, and then will be selectively redeployed, as necessary, in spring 2018 for turbidity control during restorative layer placement work." Please expand on or provide a separate section regarding the "selective deployment" criteria.

Section 4.4 Installation and Removal of Barrier Systems: A barrier system is required (lakeside) during the preparation for and installation of the west peninsula extension and the gap closure as well as during removal.

Section 4.4 – Pg. 23: Will the partial height curtain mentioned to be used during installation of the gap closures be in place prior to all work, or just the gap closure work (temporary rock berm and installation of crushed stone)?

The barrier is partial height – what is the proposed length of the barrier?

What is the quantity of crushed stone to be placed?

Section 4.4 – Pg. 24: Concerns about the sampling protocol for the restorative layer material contained in the geotubes.

Why is the material only being tested in the uppermost tube? Testing should be done to all geotubes facing dredge operations.

How many samples will be taken?

How will the sampling be done? Turn around on results? This needs to be reviewed and approved by the Agencies prior to any material being placed.

Remove the term "to the extent feasible" in regards to restorative layer material placement – no material should be placed beyond the site boundaries, as has been previously discussed.

Rock berm material – if not used for habitat features where will it be disposed?

Section 4.4, 5th Paragraph discusses very briefly the actions that will be taken in the event of a partial or complete failure of the gap closure systems. The brief discussion focusses on barrier curtains with no mention of failure of the gap closure itself. Please provide a more detailed contingency plan especially with regard to the gap closure. Perhaps this can be provided as an addendum to the Final Design in order to allow time for development of a more detailed contingency plan.

Section 4.4, 7th Paragraph states, "Prior to geotextile tube decommissioning, the restorative layer in the uppermost tube in both gaps will be sampled for tPAH (composite sample from three locations below the waterline for each gap". It is possible, that contaminates will reach the gap closure and may not be limited to the uppermost tube. All tubes should be sampled. If the contents of one or more tubes are found to be above the RAL a detailed removal/disposal plan must be submitted to the Agencies so the potential for the contaminates entering the lake can be evaluated and discussed with FE-JV.

Other Geo-tube related items: Was information ever provided as to whether the analysis of the permeability of the geotubes was based on the sand, the fabric, or both?

Description of how the geotubes will be installed. Will slurry be used? Will water be pumped form the lake to create the slurry?

A WPDES permit equivalency be required (water discharge from slurry)?

Containment for turbidity, clarify how it will be installed on drawings.

Is the geotubes fabric considered contaminated since the material will have been potentially exposed to contamination during dredging?

Section 5.3.4.2, Preferred Peninsula Slope Stabilization Design: A final plan for the Preferred Peninsula Slope Stabilization Design needs to be determined. This work will require a Chapter 30 permit equivalency. In order to write that document a specific design must be submitted.

Section 5.3.4, Design Considerations and Appendix B-5: Any impacts to the peninsulas will require a discussion with the City if there may be changes to the size/configuration of the peninsulas.

If backfill were proposed, we would need specifications on what the backfill material would be, how it would be installed, where excavated material would be disposed (if not reused as backfill).

SWAC: the previous EPA comment letter (January 17, 2017) commented on the SWAC calculations in Section 5.7.3 and Appendix B-6. The intent of the comment was not addressed by the changes to the footnote in section 5.7.3 The SWAC is a critical piece to the full-scale puzzle and is insufficiently documented in the Final Design. As such, we developed the information on the SWAC requirements from the ROD. For simplicity, please replace Appendix B-6 with the attached memo and remove the references to the Fox River, which is not applicable.

DMU bathymetry will be available to the Agencies prior to confirmation sampling.

Section 7, Air and Odor Management: It should be noted "Air quality standards, as identified as ARARs, shall not be exceeded outside the exclusion zone (work/handling) or during the transport of contaminated media" (ROD page 93, 99).

Section 7.2, Paragraph 8 states, "The Specifications contain a monitoring plan for determining whether GAC should be changed out." The "change out" monitoring plan can remain in the Specifications but it must also be included in the actual site Monitoring Plan.

Section 9.1, Restorative Layer Material Specification: As determined during the Wet Dredge Pilot Test restorative layer placement, turbidity was an issue. The spec for restorative layer material needs to include washed sand.

Section 9 - Site Restoration needs to address the peninsulas and placement of backfill.

Section 9
Consider the material gradation spec. to minimize turbidity issues after placement – alum will not likely be approved for use once dredging is complete.

No amendments without Agency approval.

Habitat Enhancement Features – can't be approved until further detail is provided to ensure the material will not interfere with future use or would be a navigation hazard (no indication of the height of the material on the bed – concern for props or fixed keel sailboats depending on elevation after placement).

Specs
00 10 00 1.5 A – Sequence may need to be adjusted to reflect installation of barriers lakeward of gap closure during 2017 and in 2018 include decommissioning of the gap closure with barrier placement lakeward during the process.

35 20 23 1.3A – evaluating the effectives and implementability of Wet Dredging was an objective of the Pilot, not the full scale. This appears to be a carryover that requires revision.

35 53 00 & 44 41 21: Please add provisions for turbidity control during gap closure installation and decommissioning, as well as using the material as restorative layer, as discusser in earlier comments.

QAPP
12k: Recommend that this annotation be footnoted to indicate that in the event that VOC sampling is needed (e.g. through adaptive management) for other SW locations, this worksheet would apply.

12u: Recommend that the worksheet remain but be annotated that it is not required in monitoring plan but is being retained as a contingency (link to the ROD).

12w: Recommend that the worksheet remain but be annotated that it is not required in monitoring plan but is being retained as a contingency (link to the ROD).

15b: Dredged Material: The table needs to be adjusted to reflect that detection levels appropriate for the dredged material (e.g. for disposal) - clean up standard is not appropriate for this.

15c: VOCs at Compliance Locations: Include a footnote that indicates that the information would apply to the other SW locations if monitoring plan adapted to include.

17 Air VOCs: Based on discussion of air monitoring, need to incorporate the stack emissions. Monitoring - SUMA canisters.

If you have any questions or would like to discuss things further, please contact me at 312-886-1999.

Sincerely,

Scott K. Hansen
Remedial Project Manager

cc: Jamie Dunn, WDNR
Adam Brown, Weston Solutions
Denis Roznowski, Foth
Jim Burton, Weston Solutions
Bhuvnesh Parekh, Weston Solution