



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

March 17, 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 conditional approval of Final Design (100%) for Phase 2
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 revised Final Design (100%) 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). EPA notes that NSPW is requesting approval on the working document referred to as "*Final Design for Phase 2 Wet Dredge.*" EPA grants **conditional approval** of the current version, in concept, of the design; however, the following items listed below need to be addressed before EPA grants final approval of the design.

General Comments:

- Throughout the document, NSPW diminishes the emission control function of the air treatment system. Yes, the modeling provided indicates that the emission rates fall below the threshold for permitting in NR 445.07 and odor control is the primary reason that NSPW is implementing the air treatment system. However, the site setting has a sensitive receptor, suggesting that emission control is an important safeguard. Most importantly, odor-causing chemicals and emissions cannot be neatly segregated. The agencies therefore request references be updated to an "Air Treatment System" or "Odor/Emission Control System" to acknowledge the dual purpose.
- The Chapter 30 Equivalency will be on hold/selectively issued until we have received more information related to:
 - Temporary/permanent sheet pile installation
 - Peninsula stabilization and dredge technical information
 - Geotube installation (WPDES permit etc.) and procedures/disposal of material if it is contaminated
 - Use of temporary rock berm material as habitat structures (or to be left in place once a permit has been issued to the City of Ashland)

Specific Comments

- Main Text, 4.2, page 18, states: “Gap closure during restorative layer placement in 2018 is helpful but not essential, as the source of the potential turbidity will be the restorative layer material being placed, which carries no COCs.” While the restorative layer material may not carry COCs, it is required that turbidity (regardless of contamination) must be contained and may not escape the project area during placement, and containment must be in place until turbidity levels have met standards.
- Main Text, 4.2, Page 19: There is a discussion on changes on the proposed design for the geotubes gap barrier stating that, “Any substantive changes to this proposed design will be forwarded to the Agencies for review/approval prior to construction.” Definitions of substantive can vary based on perception. It is recommended that any changes to the design be submitted to the Agencies to ensure that changes will not affect the ability for the project to progress.
- Main Text, 4.4, page 23 states: “Areas along the ends of the west gap closure, and the slope of the west end of the Breakwater, will be filled with crushed stone (2-inch minus) to from the necessary surface.” The crushed stone should be a washed crushed stone, please provide grain size test results of the material proposed.
- Main Text, 4.4, page 23 states: The temporary partial height barrier curtain will use anchors. Please indicate the type of anchors so we can determine the permitting path. Are these proposed to be manta rays or posts?
- Main Text, 4.4, page 23: The temporary partial height curtain for the gap closures shall not be removed until turbidity levels are met within barriers. Changes related to the removal criteria for the temporary partial height curtain should also be made in the monitoring plan to reflect the appropriate timing for removal based on standards.
- Main Text, 4.4, page 23: Discharge of the/from the slurry solution used to fill the geotubes will be covered as an addendum to the site WPDES Equivalency. This addendum will include a standard of 40 MG/L TSS outside of the containment.
- Main Text, 4.4, page 25: Rock from the temporary rock berm cannot be utilized for habitat structures until we have a plan approved by the City of Ashland.
- Main Text, 5.3.4: This section indicates that there would be no issues with the sheetpile for the slurry wall. The sheetpile cannot be authorized permanently under a Chapter 30 permit equivalency unless its long term function is necessary to the site meeting required clean up goals. If it serves only a temporary purpose and has no long term function, it must be removed before project close out.
- Main Text, 5.7.3, Page 46 footnote: Please add “consistent with the Record of Decision” to the end of the last sentence after “EPA and WDNR agree that an adaptive management approach is available to address SWAC methodologies, if necessary”.
- Main Text 5.8 states: During shoreline sediment removal, the upper portion of the shoreline sheet pile will be cleaned and a protective coating applied to effectively mask the sheet pile from staining. What is the protective coating?
- Main Text 5.8.2: Similar to the comment above, this section suggests that an underwater diver would apply a coating to the shoreline sheet pile wall. Please provide information on the proposed product. This would be considered applying a chemical to a waters of the state and require an additive worksheet review by the WPDES program.
- Main text Section 7, page 57, second paragraph: Please remove the sentence that the air treatment system is a Best Available Control Technology.

- Main text Section 7, page 57, second paragraph: A sentence indicates that NR 445 is **not** an ARAR and references Appendix D of the ROD. This is incorrect in two ways 1) Appendix D of the ROD is the COC list for the site not the ARARs, Appendix C is the ARAR list. 2) Appendix C and the *ARAR Summary for Potential Sediment Remedial Alternatives* table identified NR 400-499 (page 179 of the ROD and shown below) for all types of dredging (wet or dry). Correct this error.

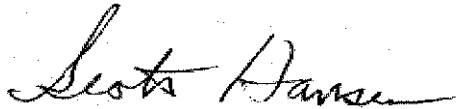
ARAR Summary for Potential Sediment Remedial Alternatives						
ARAR/TBC	Alt. SED-2		Alt. SED-3		Alt. SED-4 and SED-5	
	Dredge, place in COF		Dredge, Cap		Dredge-All	
	Apply	Comply	Apply	Comply	Apply	Comply
Chemical Specific						
Clean Water Act Section 304, Ambient Water Quality Criteria, US EPA 1986	Yes	Yes	Yes	Yes	Yes	Yes
Clean Water Act Section 303, Water Quality Standards, 40 CFR 131	Yes	Yes	Yes	Yes	Yes	Yes
Clean Water Act Section 304, Sediment Quality Criteria, US EPA 1991	No	NA	No	NA	No	NA
RCRA - Definition of Hazardous Waste, 40 CFR 261	No	NA	No	NA	No	NA
Clean Air Act, National Primary and Secondary Ambient Air Quality Standards (NAAQS), 40 CFR Part 50	Yes	Yes	Yes	Yes	Yes	Yes
Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 61	No	NA	No	NA	No	NA
WDNR Water Quality Standards for Wisconsin Surface Waters, WAC NR 102-115	Yes	Yes	Yes	Yes	Yes	Yes
WDNR Wisconsin Groundwater Quality, WAC NR 140	Yes	Yes	Yes	Yes	Yes	Yes
WDNR Wisconsin State Air Pathogen Control Regulations, WAC NR 400-199	Yes	Yes	Yes	Yes	Yes	Yes
WDNR Wisconsin State Soil Cleanup Standards, WAC NR 720	No	NA	No	NA	No	NA

- Monitoring Plan: Please incorporate the sampling of the geotubes as described in the main text into the Monitoring Plan (Table 1-1 and Section 4).
- Monitoring Plan 2.6.2: Alum use is contingent on removing the flocculated material via dredging following application. As such, please revise the Monitoring Plan that alum will not be used after restorative layer placement.
- Monitoring Plan: 4.2.1, last paragraph: Please add that although the deeper intervals will be achieved, that visual assessment for evidence of PAHs and NAPL will be performed upon core processing.
- Monitoring Plan 4.3.3: Please add that the not to exceed 22 tPAH is also applicable to the restorative layer reconfirmation, not only the 9.5 SWAC.
- Monitoring Plan SOP-12: This SOP needs to include calibration for the probe and the procedure for recording a reading. This includes an assessment of the stability of the PID reading and or the duration from the insertion of the probe until the reading is recorded.
- Monitoring Plan SOP: A SOP for SUMMA canisters needs to be included in the Monitoring Plan.
- Monitoring Plan SOPs, Air Monitoring Field Form: Please include a location for and record humidity as part of the Air Monitoring Field Form. Also see general comment regarding the title.
- Flowchart 3: Please add that turbidity must be met landward of the breakwater prior to decommissioning the gap closures.

- Monitoring Plan: Staging and Processing Material Flow Plan, Drawing 5: Please move AMP-01 south, to the top of the bluff to be closer to the hotel and stack elevation.
- Monitoring Plan: Staging and Processing Material Flow Plan, Drawing 5: Please move AMP-02 north and east, closer to the bluff edge and also the playground area.
- Monitoring Plan Appendix F: Please change the reference from TVOC to VOCs as a complete list of analysis is not being conducted.
- Monitoring Plan Appendix F: Please include TVOC as part of the analysis list to be reported by the laboratory. These results for TVOC would include concentrations of all the analytes that are not reported and tentatively identified compounds (TICs). This value could help in establishing a trend with the PID results.
- Monitoring Plan Appendix F: Please clarify that the breakthrough value will be established at the end of the second week. Additionally, indicate that, during the course of the project this value will be revisited and revised based upon additional data and evaluation.
- Monitoring Plan Appendix F: The text suggests that when the GAC would require a replacement at that point the air sampling PID results will be evaluated. Agencies recommend this value should be established prior to observing any breakthrough. However, as part of the adaptive management process this value would change as evaluations/correlations are revisited and re-established.
- Monitoring Plan Flowchart 1 & 3: Include the specific criteria used to support the removal of the temporary partial-height curtain in the related box on the flow chart.

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
Denis Roznowski, Foth
Jim Burton, Weston Solutions
Bhuvnesh Parekh, Weston Solution