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FILE REF: 4400

SUBJECT:	Better Brite Extension	
FROM:	Terry Koehn Loehn	NWD
TO:	Dick Kalnicky	SW/3
DATE:	December 2, 1994	

As per your request, the following is provided as an overview of why the performance of the RI/FS is behind the original SCAP schedule. Please keep in mind that I do not have any of the site related files. Should more detail be required talk to Kate Frieburg (Better Brite Project Manager) or possibly Gary Edelstein. As I remember it, much of this information has previously been provided to EPA through letters and quarterly reports.

The Better Brite Cooperative Agreement was originally obtained in September 1990. The WDNR hired a Project Manager for the site in February 1991. Once this was accomplished a significant amount of time was required to select and hire a consulting firm. Additional time was then used in preparation of workplans. As these were nearing completion EPA approached the WDNR with the idea of using SACM to accomplish a source removal type action. At that time it was agreed that postponement of the RI/FS was acceptable to allow for the performance of the SACM like action, which required from six months to a year. Upon completion of the SACM like action contracting for the second phase of the RI/FS was performed (the first phase was development of plans, the second phase was the performance of the field work and report preparation). A significant delay was then encountered due to problems in obtaining indemnification for the Consultant. EPA had recently changed the rules on indemnification. Once this was taken care of the WDNR Project Manager accepted a different position. Several months passed as the WDNR selected a replacement Project Manager and that person came up to speed on the site. During the summer of 1994 field work commenced at the site.

On looking through some of the correspondence I do have available, I noted a letter to David Linnear (EPA-RPM) dated 12/23/93 that provided a tentative schedule for activities. A copy of the letter and schedule were provided to J. McLimans. This letter may be helpful. I do not know if a final schedule was developed. However, from what I know of the recent progress on the site we appear to be close to the schedule proposed in the December 1993 letter. A memo was also prepared for Tom Eggert dated 3/30/92 that may be useful. I prepared this memo in response to a site update request from Eggert dated 2/3/92. Additional sources of information that may be helpful would be the Quarterly Reports sent to EPA and the Polreps prepared by EPA's OSC for the site.

Please use the above as you see fit to prepare the narrative for your request for a schedule extension. I hope it proves to be helpful.

cc:	J.	Lemcke	SW/3
	К.	Frieburg	SW/3



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TO:	Kalnicky	34	
AGENCY: <u>SW</u>	3		
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FROM:	Koehn		
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PAGES TO FOLLOW (EXCL	LUDING COVER SHEET):	/	
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State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES



George E. Meyer Secretary Lake Michigan District Headquarters 1125 N. Military Avenue P.O. Box 10448 Green Bay, WI 54307-0448 TELEPHONE # (414)492-5869 TELEFAX # (414)492-5913

December 23, 1993

File Ref: WIT-560010118 WID-006132088 Brown Co. SFND

Mr. David Linnear U.S. EPA, Region V 77 W. Jackson Blvd., HSRW-6J Chicago, IL 60604

Re: Tentative Schedule for Better Brite Remedial Investigation/Feasibility Study

Dear Mr. Linnear:

As per your request, please find attached a tentative schedule for conducting the Remedial Investigation (RI) and Feasibility Study (FS) for the Better Brite properties. As you are aware an amendment to the contract with Simon-Hydro Search (HSI) has been signed by HSI and we are currently obtaining the necessary signatures to finalize the contract. I would expect that this will be accomplished in the next several weeks. Once signed the first step in the process will be to develop a Workplan which will include a schedule for the work assigned to the consultant. At that time we can develop our final schedule.

Now that EPA's activities at the site have concluded and the indemnification issues have been resolved work on the Remedial Investigation can hopefully proceed in a more typical manner.

Sincerely,

Terry Koehn State Project Manager

cc:	J. McLimans	SW/3
	P. Kozol	SW/3
	J. McLimans	SW/3
	D. Rossberg	LMD
	J. Fassbender	HSI
	Day File	LMD

Better Brite Site, De Pere, Wisconsin Tentative Schedule

Task	Tentative Completion Date
Contract Execution	February 1, 1994
Workplan Completion	April 1, 1994
Field Work Startup	April 1, 1994
Field Work Completion	October 1, 1994
Receipt of Final Lab Data	December 1, 1994
Draft RI Report	January 1, 1995
Final RI Report	March 1, 1995
Alternatives Array	April 1, 1995
Draft FS Report	May 1, 1995
Final FS Report	July 1, 1995
Draft Proposed Plan	August 1, 1995
Final Proposed Plan	September 1, 1995
Draft ROD	December 1, 1995
Final ROD	February 1, 1996

CORRESPONDENCE MEMORANDUM_

DATE: March 30, 1992

TO: Tom Eggert - SW/3

FROM: Terry Koehn - LMD

SUBJECT: Response to February 3, 1992 Memorandum Better Brite Site

The Better Brite RI/FS is a State lead fund financed investigation.

1. Cooperative Agreement with EPA dated Sept. 28, 1990 (ID# V995102-01). Amendment to the CA dated Sept. 9, 1991

STATE OF WISCONSIN

2. The CA includes funds for WDNR oversight.

3. According to the original CA, the Remedial Investigation report is scheduled to be completed during the State's First Quarter of the 1992-1993 FY (August, 1992). It is anticipated that this work will be accomplished during the State's Fourth Quarter of the 1992-1993 FY (April, 1993).*

4. According to the original CA, the Feasibility Study is scheduled to be completed during the State's Third Quarter of the 1992-1993 FY (March, 1993). It is anticipated that this work will be accomplished during the State's First Quarter of the 1993-1994 FY (July, 1993).*

5. Completion of the Proposed Plan is not scheduled in the original CA, however, it is anticipated to be completed during the State's First Quarter of the 1993-1994 FY (July, 1993).*

6. Completion of the Record of Decision is not scheduled in the original CA, however, it is anticipated to be completed during the State's First Quarter of the 1993-1994 FY (September, 1993). A ROD for an Interim Action was completed during the State's Fourth Quarter of the 1990-1991 FY (June, 1991).

7. There is not a separate contract in place for the performance of the RD/RA. A contract will be required.

8. NA

9. The Remedial Design is not currently scheduled. It is anticipated to be initiated during the State's Third Quarter of the 1993-1994 FY (January, 1994).*

10. The start of the Remedial Action is not currently scheduled. It is anticipated to be initiated during the State's Second Quarter of the 1993-1994 FY (October, 1994).* RA work associated with the Interim Action was initiated during the State's Second Quarter of the 1991-1992 FY (Nov.-Dec., 1991; EPA Lead).

11. The completion of the Remedial Action is not currently scheduled. Completion of the Interim Action RA is not scheduled as it includes continued operation of an existing groundwater extraction/pretreatment system for an unspecified time period. Funding for the Interim Action is currently available for approximately four years.

* A revised schedule has not been finalized to date. The anticipated dates noted above are based on internal estimates that have not been agreed to by EPA as of this date. The schedule presented in the original CA are no longer realistic.

cc: G. Edelstein



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

RECEIVED FEB 1 1 1994 LMD SOLID WASTE 101 South Webster Street Box 7921 Madison, Wisconsin 53707 TELEPHONE 608-266-2621 SOLID WASTE TELEFAX 608-267-2768 TDD 608-267-6897

File Ref: WID-560010118 Brown Co. SW/SFND

George E. Meyer Secretary

November 5, 1993

Ms. Sue Coll Wisconsin Project Officer U.S. EPA, Region V, HSM9J 77 West Jackson Street Chicago, IL 60604

Subject: Better Brite, C.A. No. V995102-01 Quarterly Report, October through December, 1993

Dear Ms. Coll:

Please find enclosed for your review, a summary of the 1st quarter, fiscal year 1994 state activities conducted under the Better Brite Cooperative Agreement.

If their are any questions, please contact Mr. James McLimans at (608) 266-0830.

Sincerely,

aul P. Dictien

Paul P. Didier, P.E., Director Bureau of Solid and Hazardous Waste Management

PPD/JMM/jm

cc: Mark Giesfeldt - SW/3 Doug Rossberg - LMD-SW Paul Kozol - SW/3 Jane Lemcke - SW/3 Terry Koehn - LMD-SW



SUPERFUND COOPERATIVE AGREEMENT QUARTERLY PROGRESS REPORT <u>STATE LEAD SITE</u>

Assistance ID number: V995102-01 Site name: Better Brite Activity: RI/FS & RA Reporting period: FY94, 4th Quarter

WORK ACCOMPLISHED DURING REPORTING PERIOD FOR THIS SITE AND ACTIVITIES:

- 1. A scope of work prepared by Simon Hydro-Search (HSI) was determined to be acceptable and final contracting procedures were initiated. Recent changes in EPA's indemnification procedures required additional negotiation with HSI. This caused delay in execution of the contract amendment for the second phase of work at the site. HSI signed the amendment on December 3, 1993. Signing on behalf of the state is anticipated for January, 1994.
- 2. The Cooperative Agreement (CA) was amended for the performance of the RI/FS including an increase in funds and extension of the project period. This amendment was based on the HSI proposal.
- 3. At the request of EPA, a tentative schedule (letter dated December 23, 1993) for the remaining RI/FS activities was prepared.
- 4. A review of the Preliminary Health Assessment for the site as prepared by WDOH was completed.
- 5. EPA representatives began their De Pere field work on the Galena/Platteville aquifer study in mid October 1993. Drilling the single well was completed. Testing of the well was performed in early November 1993. Onsite activities were observed by the WDNR.
- 6. The City of DePere continued to operate the pretreatment plant at the Chrome Shop, handling water from both the Chrome Shop and the Zinc Shop. A total of 27,700 gallons of water were treated during the quarter. 12,500 gallons of water were transferred from the Zinc Shop for treatment. Contracts (Purchase Orders) with Javco, Inc. were obtained for continued transfer of contaminated groundwater from the Zinc Shop to the Chrome shop for treatment. An interim contract (4 months) and a long term contract (one year) were obtained.

ESTIMATED TIME AND FUNDS NEEDED TO COMPLETE REQUIRED WORK:

RI/FS - 25 Months and \$697,000

RA - 14 Years (4 until completion of RA & 10 years after completion) and \$?

ACTUAL TIME AND FUNDS REMAINING:

RI/FS - 12 Months and \$697,000

RA - 9 Months and \$203,000

EXPLANATION OF ANY SIGNIFICANT DISCREPANCY/RATIONALE FOR ANY PLANNED FUNDING INCREASE REQUEST OR TIME EXTENSION REQUEST:

After a schedule for the RI/FS is finalized we will be preparing a budget extension request.

Prepared by

uni Date 2/8/94 James McLimans - Coordinator

CORRESPONDENCE/MEMORANDUM

State of Wisconsin

-9-93

Department of Natural Resources Bureau of Solid & Hazardous Waste Management

RECEIVED

DEC 0 8 1993 LMD SOLID WASTE

Date: December 7, 1993

To: **Bob** Strous

From:

Jim McLimans - SW/3

Subject: Environmental Fund Request

I am sending this memo to request your approval to commit \$60,000 of Environmental Fund (E.F.) dollars to the Better Brite Superfund RI/FS project.

We currently have a cooperative agreement (C.A.) with EPA to fund this project. However, this C.A. does not have sufficient funds to cover any contingencies for our contract. We think it is reasonable to set aside \$60,000 or approximately 10% of the contract cost for contingency.

If these E.F. dollars are indeed spent on this project we will attempt to amend our C.A. to obtain additional Superfund dollars from EPA and reimburse the E.F.

APPROVED:

cc:

for M.FG 12/7/93 Mark Giesfeldt

Gary Edelstein - SW/3

cc: P. Kozol SW/3

Terry Koehn - LMD







AF.

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUN 1 2 1992

REPLY TO THE ATTENTION OF:

Mr. Terry Koehn Wisconsin Department of Natural Resources 1125 N. Military Avenue Green Bay, WI 54307-0448

RECEIVED

JUN 2 2 1992

LAD SOLID WASTE

RE: Better Brite RI/FS

Dear Mr. Koehn

On September 20, 1990, A Cooperative Agreement (CA) between the Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (U.S. EPA) went into effect. The CA contained a proposed budget of \$790,982 starting October 1, 1990 and ending July 31, 1993. The result of the CA will be a Superfund financed Remedial Investigation/Feasibility Study (RI/FS) conducted and executed by the WDNR.

Another component of the CA is a proposed project schedule. This schedule for the RI/FS is comprised of 14 tasks and a Community Relations (CR) program that the WDNR will conduct. A Statement of Work (SOW) description for these 14 task follows the schedule. The proposed project completion in the schedule for these tasks and the CR program is July 31, 1993.

Our regular review of these tasks and their scheduled date of completion is the purpose of this memo. To date the following 2 tasks have been completed and Task 3 partially completed:

- Task 1: Data Summary (DNR) Summary and validation of existing data. Completed June 17, 1991.
- Task 2: Contractor Procurement Simon/Hydro-Search contracted for RI/FS July 31, 1991.
- Task 3.1: Evaluation of Existing Information Under the task of Project Planning (Scoping), this subtask is the compilation of data into a site background summary. Completed March 20, 1992.
- Task 3.3: ARAR's Consideration Under Project Planning, this subtask is the consideration of potential ARAR's. Completed March 20, 1992.

The remaining 12 uncompleted tasks and their scheduled completions are outstanding.

The WDNR currently stands at least 10 months behind the approved schedule established in the CA. Projecting out the timeframe used in the approved CA puts completion of the RI/FS at approximately June 30, 1994. WDNR's regular Quarterly Reports bears confirmation that this schedule is slipping. This slippage in schedule is a major concern to the U.S. EPA. We are certain, it is also a concern of the WDNR.

On April 7, U.S. EPA received the Draft Sampling and Analysis Plan (SAP), Data Management Plan (DMP) and Health and Safety Plan (HSP), followed by a submittal of the draft Quality Assurance Project Plan (QAPP) and Baseline Risk Assessment Plan (BRAP) on April 17, 1992. U.S. EPA is awaiting the arrival of the Work Plan for the project, which was due on May 15, 1992.

After reviewing the draft submittals, the initial project schedule, and the potential revised schedule (see attachment), it is concluded that the WDNR and U.S. EPA need to assess current goals, purposes, and directions. This discussion may prompt benefical changes that need to be instituted. Thus far, this site has had a significant amount of time, work, money, and research done on it which may help us to develop a more timely, efficient, and effective plan for a rapid remediation of this site.

I am available to meet on this is in the WDNR Green Bay District Office on June 26, 1992 at 9:00am. If this time and date pose a conflict, please inform me so that a mutual alternate can be chosen.

The following items have been suggested as agenda points. Please review, modify as needed and return any changes so that the WDNR and U.S. EPA have a comprehensive agenda.

Proposed Agenda

- I. Introduction and purpose for meeting
- II. WDNR's and EPA's role in RI/FS
- III. WDNR's Project Status Report

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- IV. WDNR's proposed scheduling modification
- V. Alternative approaches to reach clean-up

If you have any questions, please feel free to call me.

Sincerely,

David Linnear Project Manager

Attachment

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> cc: Doug Rossenberg James Mayka Jim McLimans Dan Cozza Susan Coll



SOLID AND HAZARDOUS WASTE PROGRAM

E.R.R.P. Environmental Repair and Remediation Program L.U.S.T.

Leaking Underground Storage Tanks HAZARDOUS WASTE



Date: <u>6-22-92</u>

Please Deliver the Following Pages:
To: Name: <u>Gary Edelstein</u>
Bureau/Agency:
Fax Number:
From:
Name:Koehn Phone Number:414-492-5869
Pages to Follow (excluding cover sheet):
Comments/Message: Better Brite Schedule
Please call me to discuss on Tues

Wisconsin Department of Natural Resources Lake Michigan District Headquarters 1125 N. Military Avenue P.O. Box 10448 Green Bay, WI 54307-0448 **TELEPHONE # (414) 492-5916** TELEFAX # (414) 492-5859



\wpdata\misc\fax(JR)

Doug -

cc: G. Edelstein sul3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUN 1 2 1992

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- II. WDNR's and EPA's role in RI/FS
- III. WDNR's Project Status Report
 - IV. WDNR's proposed scheduling modification
 - V. Alternative approaches to reach clean-up

PROPOSED PROJECT SCHEDULE

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If you have any questions, please feel free to call me.

Sincerely David Linnear Project Manager/

cc: Doug Rossenberg James Mayka Jim McLimans Dan Cozza Susan Coll

PROPOSED PROJECT SCHEDULE

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cc: G. Edelstein sw/3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUN 1 2 1992

REPLY TO THE ATTENTION OF:

Mr. Terry Koehn Wisconsin Department of Natural Resources 1125 N. Military Avenue Green Bay, WI 54307-0448

RECEIVED

JUN 16 1992

LMD SOLID WASTE

RE: Better Brite RI/FS

Dear Mr. Koehn

On September 20, 1990, A Cooperative Agreement (CA) between the Wisconsin Department of Natural Resources (WDNR) and the United States Environmental Protection Agency (U.S. EPA) went into effect. The CA contained a proposed budget of \$790,982 starting October 1, 1990 and ending July 31, 1993. The result of the CA will be a Superfund financed Remedial Investigation/Feasibility Study (RI/FS) conducted and executed by the WDNR.

Another component of the CA is a proposed project schedule. This schedule for the RI/FS is comprised of 14 tasks and a Community Relations (CR) program that the WDNR will conduct. A Statement of Work (SOW) description for these 14 task follows the schedule. The proposed project completion in the schedule for these tasks and the CR program is July 31, 1993.

Our regular review of these tasks and their scheduled date of completion is the purpose of this memo. To date the following 2 tasks have been completed and Task 3 partially completed:

- Task 1: Data Summary (DNR) Summary and validation of existing data. Completed June 17, 1991.
- Task 2: Contractor Procurement Simon/Hydro-Search contracted for RI/FS July 31, 1991.
- Task 3.1: Evaluation of Existing Information Under the task of Project Planning (Scoping), this subtask is the compilation of data into a site background summary. Completed March 20, 1992.
- Task 3.3: ARAR's Consideration Under Project Planning, this subtask is the consideration of potential ARAR's. Completed March 20, 1992.

The remaining 12 uncompleted tasks and their scheduled completions are outstanding.

The WDNR currently stands at least 10 months behind the approved schedule established in the CA. Projecting out the timeframe used in the approved CA puts completion of the RI/FS at approximately June 30, 1994. WDNR's regular Quarterly Reports bears confirmation that this schedule is slipping. This slippage in schedule is a major concern to the U.S. EPA. We are certain, it is also a concern of the WDNR.

On April 7, U.S. EPA received the Draft Sampling and Analysis Plan (SAP), Data Management Plan (DMP) and Health and Safety Plan (HSP), followed by a submittal of the draft Quality Assurance Project Plan (QAPP) and Baseline Risk Assessment Plan (BRAP) on April 17, 1992. U.S. EPA is awaiting the arrival of the Work Plan for the project, which was due on May 15, 1992.

After reviewing the draft submittals, the initial project schedule, and the potential revised schedule (see attachment), it is concluded that the WDNR and U.S. EPA need to assess current goals, purposes, and directions. This discussion may prompt benefical changes that need to be instituted. Thus far, this site has had a significant amount of time, work, money, and research done on it which may help us to develop a more timely, efficient, and effective plan for a rapid remediation of this site.

I am available to meet on this is in the WDNR Green Bay District Office on June 26, 1992 at 9:00am. If this time and date pose a conflict, please inform me so that a mutual alternate can be chosen.

The following items have been suggested as agenda points. Please review, modify as needed and return any changes so that the WDNR and U.S. EPA have a comprehensive agenda.

Proposed Agenda

- I. Introduction and purpose for meeting
- II. WDNR's and EPA's role in RI/FS
- III. WDNR's Project Status Report
 - IV. WDNR's proposed scheduling modification
 - V. Alternative approaches to reach clean-up

If you have any questions, please feel free to call me.

Sincerely David Linnear Project Manager/

cc: Doug Rossenberg James Mayka Menceni's Supervisor Jim McLimans Dan Cozza Susan Coll

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PROPOSED PROJECT SCHEDULE

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PROPOSED PROJECT SCHEDULE

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