

From: [Graham, Joseph R - DNR](#)
To: [Bessingpas, David](#); [Sager, John E - DNR](#); [Endsley, Erin A - DNR](#)
Cc: [White, Crawford](#); [Patarcity, Jane M \(Pittsburgh\) USA](#); [Evanko, Hillary M \(Pittsburgh\) USA](#); [Stuart Messur](#); [Anderson, Paul](#); [Pfeiffer, Danielle](#); [Klatt, David/CHC](#); [Seaman, Jennifer/CHC](#); [Williams, Heather](#); [cieniawski.scott](#); [Justin Drehs](#); [Havlicek, Kevin](#); [White, Patricia/BOS](#); [Winter, Douglas](#); [Fassbender, Judy L - DNR](#); [Saari, Christopher A - DNR](#)
Subject: RE: Crawford Creek Floodplain DGI - TOC Analysis
Date: Tuesday, April 30, 2024 5:16:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Dave and others,

DNR has no objection to the elimination of the TOC sampling currently if (1) EPA agrees with his change and (2) implementation of a remedy is not delayed in the future due to a need to collect TOC information for design or any other purpose. As an alternative, consider analyzing TOC using Lloyd Kahn as initially proposed. Given the challenges identified with accredited lab capacity for method 9060, the DNR's remediation & development program can accept TOC results for this site using the Lloyd Kahn procedure as initially proposed, provided the specific procedures are identified in the QAPP and consistent with those used for historical data collection at the site. DNR will not require the use of an accredited lab for TOC using the Lloyd Kahn method for the 2024 DGI investigation at Crawford Creek.

Sincerely,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Joe Graham

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joseph.graham@wisconsin.gov

From: Bessingpas, David <David.Bessingpas@arcadis.com>
Sent: Monday, April 29, 2024 3:15 PM
To: Graham, Joseph R - DNR <Joseph.Graham@wisconsin.gov>; Sager, John E - DNR <John.Sager@wisconsin.gov>; Endsley, Erin A - DNR <erin.endsley@wisconsin.gov>
Cc: White, Crawford <White.Crawford@epa.gov>; Patarcity, Jane M (Pittsburgh) USA <Jane.Patarcity@TRMI.Biz>; Evanko, Hillary M (Pittsburgh) USA <Hillary.Evanko@Trmi.biz>; Stuart Messur <smessur@anchorqea.com>; Anderson, Paul <Paul.Anderson@arcadis.com>; Pfeiffer, Danielle <Danielle.Pfeiffer@arcadis.com>; Klatt, David/CHC <David.Klatt@jacobs.com>; Seaman, Jennifer/CHC <jennifer.seaman@jacobs.com>; Williams, Heather <williams.heather@epa.gov>; cieniawski.scott <cieniawski.scott@epa.gov>; Justin Drehs <JDrehs@anchorqea.com>; Havlicek, Kevin <Kevin.Havlicek@arcadis.com>; White, Patricia/BOS <Patricia.White@jacobs.com>; Winter, Douglas <Douglas.Winter@jacobs.com>
Subject: Crawford Creek Floodplain DGI - TOC Analysis

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Hi Joe,

As we discussed via telephone last Friday, Beazer and USEPA are proposing a change to the Crawford Creek Floodplain (Sub-Area B/C and D) Data Gap Investigation Scope of Work: removing total organic carbon (TOC) from the analytical suite. This email requests WDNR's concurrence with that proposed change in scope.

The basis for this request is related to the change in TOC analytical method (from Lloyd Kahn to Method 9060A) that WDNR suggested during an April 2, 2024 conference call (because Method 9060A is the only TOC methodology that WDNR certifies under NR 149). There are three Eurofins labs listed with NR 149 certification for non-aqueous TOC analysis via Method 9060A: Denver, Buffalo, and Chicago. However, based on discussions with Eurofins, Denver is the only lab that can produce TOC results in mg/kg (Buffalo and Chicago run the test as a leachability-type analysis that provides results in mg/L). Further, we were told that the Eurofins Denver lab can only accept 50 samples per week, which would substantially prolong the field schedule (~500 samples at 50/week = 10 weeks).

Besides timing, there are concerns about the comparability of results between Lloyd Kahn and Method 9060A, recognizing that most of the existing TOC sample data was reported using the Lloyd Kahn method. If we were to make a change in method, we would want to run a subset of samples via both methods to understand the differences in results, which could complicate the reporting process and further alter the project costs and schedule.

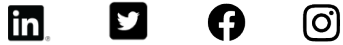
Because of all the complicating factors associated with a potential TOC analytical method change, we took a step back and asked whether we really needed to collect TOC as part of this field program. We don't think the TOC data are needed at this point in the project to evaluate floodplain data or remedial alternatives in the FFS. This conclusion is based on the following factors: 1) the large amount of historical TOC data for floodplain samples; 2) site conditions have not substantially changed over time, such that TOC content also likely has not changed; and 3) TOC content is not anticipated to be used directly in the development and evaluation of floodplain remedial alternatives. Therefore, we are proposing to remove TOC from the analytical suite for the upcoming DGI work.

Pending WDNR's concurrence with this change, we will update the DGI Work Plan and QAPP accordingly. Please reply as soon as possible.

Thanks, Dave

David Bessingpas
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