

**From:** Grittner, Paul V - DNR  
**Sent:** Tuesday, August 06, 2019 5:19 PM  
**To:** 'Dan Dunn'  
**Subject:** RE: NR 718 Exemption Request, GM Sediment, Janesville

Dan,

We have a few questions/comments regarding the Amended Soil Management Plan:

- 1) Was Soil Sample #11 a duplicate analysis of the Geo-Bag #1 sample (they were not collected separately?)
- 2) What are the QC #1 and #2 samples. Were they a duplicate analysis of a different sample? If so, which ones? Or were they different composite samples from a pile otherwise sampled?
- 3) Who is a property owner contact that the 718 exemption approval can be addressed to?
- 4) Confirm that the owners of the properties where the material current is and where it is proposed to go are the same.
- 5) Analytical reports for all samples referenced in your request should be provided for review. A rather large report generated last year was provided last night that does not appear to apply to this request.
- 6) Is the area proposed for reuse a naturally low area, an area that was excavated in the past, or an area that was recently (or will be) excavated specifically to accept the dewatered sediment?
- 7) A draft cap maintenance plan should be submitted as part of a NR 718 exemption request for the DNR to review. A template that meets the requirements NR 724.13(2) can be found here: [Maintenance Plan template](#). An acceptable plan will support your assertion that conditions will remain protective after the contaminated soil is managed as proposed.

Please let me know if you have any questions regarding the above items.

**We are committed to service excellence.**

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

**Paul Grittner**

Phone: (262) 574-2166

[paul.grittner@wisconsin.gov](mailto:paul.grittner@wisconsin.gov)

---

**From:** Dan Dunn  
**Sent:** Monday, August 5, 2019 5:21 PM  
**To:** 'Grittner, Paul V - DNR' <[paul.grittner@wisconsin.gov](mailto:paul.grittner@wisconsin.gov)>  
**Cc:** 'Fitzpatrick, William - DNR' <[william.fitzpatrick@wisconsin.gov](mailto:william.fitzpatrick@wisconsin.gov)>; 'Fassbender, Judy L - DNR' <[judy.fassbender@wisconsin.gov](mailto:judy.fassbender@wisconsin.gov)>; 'Mick Warner' <[mwarner@janesvilledredging.com](mailto:mwarner@janesvilledredging.com)>; Riley Underwood <[runderwood@enviroanalyticsgroup.com](mailto:runderwood@enviroanalyticsgroup.com)>  
**Subject:** RE: NR 718 Exemption Request, GM Sediment, Janesville

Good evening Paul,

We received all of the soil characterization analytical results and ASTM water leach data suggesting that only three ES exceedances for lead and one slight exceedance for naphthalene

(0.11 vs 0.1 mg/L ES but also found in lab blank) were reported of the 26 total samples representing 2,000 of the 11,000 cys of dried sediment-soil total volume. We evaluated the data statistically using USEPA ProUCL which yielded an applicable 95% Upper Confidence Level for lead to be only 0.0125 mg/L. less than the ES of 0.015 mg/L. We request that no impervious surface be required over the fill area on the JATCO site and native soils are sufficient. The fill area is very shallow relative to the depth of groundwater 6 ft bgs versus 60+ ft bgs. Institutional controls are further protective of human health and the environment. We did include the proposed area for an impervious cover on our drawings if deemed essential, and still believe clay or a synthetic liner are the most suitable materials for this Site.

Please contact me at your earliest convenience to discuss your thoughts regarding this submittal and the timeline to begin hauling next week.

Lab reports will follow in next email thread since large file.

Thanks,

Dan