

## Achieving a Higher Level of Remediation through Public/Private Collaboration

**Brian Bartoszek** (brian.bartoszek@wecenergygroup.com) (WEC Energy, Green Bay, WI, USA)  
Mark Thimke (mthimke@foley.com) (Foley & Lardner, LLC, Milwaukee, Wisconsin, USA)  
Jennifer Hagen (jennifer.hagen@obg.com) and Rich Weber (rich.weber@OBG.com)  
(OBG, Milwaukee, Wisconsin, USA)

**Background/Objectives.** Accomplishing sediment restoration goals and waterfront redevelopment within the Great Lakes Areas of Concern (AOCs) where there are ongoing sediment remediation projects can be challenging, particularly when the sites are managed under USEPA's Superfund program due to its structured format. By leveraging USEPA's Great Lakes Legacy Act (GLLA) funding we can shift the paradigm, invoke flexibility and realize a faster pace. For the Sheboygan River sediment remediation projects stakeholders came together with a creative approach to identifying matching fund contributions, public/private agreements and dual project execution. In this case two distinct contaminated sediment sites existed within the same footprint on the Sheboygan River in Wisconsin: 1) the Sheboygan River and Harbor Superfund project (PCB Superfund Project), and 2) a smaller former manufactured gas plant (MGP) site being addressed under the Superfund Alternative Site program, situated fully within the boundary of the ongoing PCB Superfund Project.

**Approach/Activities.** A challenge faced by the MGP project team was to implement the smaller site remedy first, identify opportunities to move quickly, enhance the required remediation and reduce future uncertainties through additional removal under a "betterment" concept. A site-specific risk based remedy and associated costs were established and approved by USEPA for the MGP site through normal process. At the same time, it was important to understand key drivers and limitations with the PCB Superfund Project scope and schedule. Project stakeholders were engaged including USEPA's Superfund Program, Great Lakes National Program Office, the Wisconsin Department of Natural Resources, and local city/county representatives along with private parties responsible for remedy implementation at the two federal lead sediment sites. It was critical to complete the MGP site work first to control cost and mitigate potential release of non-aqueous phase residuals in sediments when the PCB Superfund Project proceeded. The solution was to implement a Time Critical Removal Action (TRCA) to facilitate a desired sequence of actions for mutual benefit of all stakeholders.

**Results/Lessons Learned.** A major contributor to the success of this project was the use of the MGP TCRA project cost toward GLLA match requirements, essentially more than doubling the removal volume through the GLLA funded portion of the project. The risk based TCRA cleanup was achieved and the betterment component involved removal of additional material to a lower ambient sediment quality value for PAHs. A residual sand cover was no longer needed for the MGP site TRCA, given the PCB Superfund and betterment work to follow. Through collaboration on this project, both MGP and unrelated PCB sediment contamination were addressed in one field effort.