

DATE: May 16, 2013

TO: Lincoln Park Phase 2 PCT

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SUBJECT: Sediment Remediation Targets

We are proposing sediment remediation targets for PCBs and PAHs to account for variable conditions and remediation techniques within the Phase 2 project area. We recognize that there may be opportunities for wet and/or dry excavation for the different sediment deposits, which may require different approaches for achieving our project objectives. The main objective of this project is to:

Remove/manage sediments contributing to the following beneficial use impairments within the Milwaukee Estuary Area of Concern (AOC):

1. Fish and wildlife consumption advisories
2. Degradation of Benthos
3. Degradation of fish and wildlife habitat
4. Degradation of fish and wildlife populations
5. Restrictions on dredging

To achieve this objective, we propose the following remedial goals for PCBs and PAHs. Please note that the goals may differ depending on the remedial technique (wet vs. dry removal)

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| **Remedial Technique** | **Remedial Goal for PCBs** | **Remedial Goal for PAHs** |
| Dry excavation | <1ppm goal by the removal of sediment > 1ppm. Where <1 is impracticable (e.g., bedrock) a SWAC < 1ppm will be achieved through excavation and residuals management if needed. | 20 ppm goal achieved through excavation and residuals management if needed; or follow decision tree criteria for applying SWAC. |
| Wet excavation | <1 ppm SWAC achieved through excavation and residuals management if needed. Targeted removal of sediment >1ppm. | Follow decision tree criteria on next page for achieving goals. Residual management may follow excavation to meet remedial goals. |

We prefer that the goals for dry excavation be met as closely as possible before applying residuals management techniques, but recognize limitations of excavation in areas with bedrock. We recognize the limitations of achieving a not to exceed level with wet excavation techniques, and assume in those cases where the goals cannot be achieved through excavation alone that some type of residuals management/restorative layer may have to be employed to achieve our goals. For SWAC calculations, we prefer that the calculations be made for SWAC for each discrete deposit rather than over broad stretches of the river because we are looking at strategic removal of discrete deposits and not a broad scale reach by reach excavation.

