

Environmental Protection Plan
Sheboygan River and Harbor Superfund Site
Sheboygan County, Wisconsin
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Prepared By
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1.0 INTRODUCTION

The Environmental Protection Plan (EPP) has been prepared to document environmental management activities to be implemented as part of Sediment Removal remedial actions required at the Sheboygan River and Harbor Superfund Site, Sheboygan County, Wisconsin. Remedial activities are required to be implemented as set forth in the Record of Decision (ROD), Consent Decree (CD), and Lower River Statement of Work (LRSOW).

It is the intent of this program to prevent environmental pollution or damage during and as a result of construction operations. It is the policy to develop the Environment Protection Plan in conjunction with all federal, state, and local laws, and regulations, as well as the Specifications. This plan includes the elimination or limitation of chemicals, physical or biological elements or agents that adversely affect human health or welfare; unfavorably alter ecological balances of importance to human life, affect other species of importance to man; or degrade the utilities of the environment for aesthetic and recreational purposes. Preservation of land, water, and fish/wildlife resources within the project boundaries and outside the limits of permanent work performed will be a priority.

The following laws and regulations in whole or part are pertinent to this project:

1. Fish and Wildlife Act of 1956
2. Fish and Wildlife Coordination Act of 1958
3. National Historic Preservation Act of 1966
4. National Environmental Policy Act of 1969
5. Endangered Species Act of 1973
6. Clean Water Act of 1977
7. Clean Air Act
8. Comprehensive Environmental Response, Compensation, and Liability Act
9. Wisconsin Pollution Discharge Elimination System
10. Toxic Substance Control Act

The Project Team will establish and maintain environmental protection of all items set for in the Specifications. They will record and maintain field reports of any problems in complying with laws, regulations, and ordinances. Immediate corrective actions will be taken to correct pollution of or damage to the environment due to accident, natural causes, or failure to follow the procedures set out in our environmental protection plan.

2.0 RESPONSIBILITIES

The Project Manager (or designee) will be responsible for the execution of the EPP and will include the following:

1. Ensuring adherence to the Environmental Protection Plan;
2. Manifesting TSCA and non-TSCA waste to be removed from the site, and
3. Training personnel in accordance with the requirements of this plan.

3.0 ENVIRONMENTAL MONITORING

All team members have been trained through practical experience and instructions received on methods of detecting and avoiding pollution, familiarization with pollution standards, installation and care of facilities to insure adequate and continuous environmental pollution control and methods of protecting environmental resources from damage. Each individual is responsible for his/her sphere of operations.

4.0 METHOD OF PROTECTION

A. Water Resources

The Project Team will keep dredge and dredge slurry operation activities under surveillance, management, and control to prevent pollution from entering ground, drainage, or local bodies of water.

The dredge and dredge slurry operation will be conducted in a manner to minimize turbidity and conform to all applicable water quality standards. Constant radio contact will allow for quick notification should the dredge and dredge slurry operations exceed water quality standards.

The Project Team will take measures to prevent spills from:

- Fuel leaks
- Oil leaks
- Dredge and dredge slurry piping

Immediate actions will be taken to contain and clean up any spill of oily substance, contaminated water, and petroleum products. Booms, absorbent pads, and absorbent dry will be used to contain and clean-up any spills. They will be made available on the dredge, booster pumps, fuel boat, and dewatering area outside the flood zone. Any spills or exceeded water quality standard will be immediately reported to the Project Manager. Reportable quantities will be reported to the National Response Center (NRC), United States Environmental Protection Agency (USEPA), and Wisconsin Department of Natural Resources (WDNR). A Spill Prevent Plan is included as Appendix A.

B. Fish & Wildlife Resources

The Project Team will keep remediation activities under surveillance, management, and control to minimize interference with, disturbance to, and damage to fish and wildlife.

C. Cultural, Historical, and Archaeological Resources

All items discovered during remediation activities, having any possible historical or archaeological interest, will be carefully preserved. The Wisconsin Department of Natural Resources (WDNR) Project Manager and the Wisconsin State Historical Preservation Officer (SHPO) will be notified immediately upon finding any potential cultural, historical, or archeological resources.

D. Air Resources

The Project Team will keep remediation activities under surveillance, management, and control to minimize pollution of air resources. All activities, equipment, process and work

operated or performed in accomplishing this project will be in strict accordance with the applicable air pollution standards. All diesel engines used on this project are maintained at the highest acceptable industrial standards for operating to prevent air pollution. If any engine runs poorly, it will be repaired to meet proper pollution standards. In addition, air monitoring will be performed to evaluate fugitive dust emissions during each sediment load-out phase or anytime there is visible dust. Any exceeded air quality standard will be immediately reported to the Project Manager or designee, who will then notify the USEPA and WDNR.

E. Sound Resources

The Project Team will keep construction activities under surveillance and control to minimize damage to the environment by noise. The dredge, booster pumps, and Wastewater Treatment Plant (WWTP) pumps will be equipped with noise reducing mufflers.

5.0 SOLID WASTE DISPOSAL

Solid waste (i.e. general trash) will be collected daily, as part of housekeeping, into plastic lined containers. The solid waste will be transported and deposited in accordance with all laws regarding the disposal of solid waste.

6.0 CHEMICAL WASTE DISPOSAL

Chemical waste (i.e. used oil and fluids) will be stored in corrosion resistant containers and disposed in accordance with federal, state, and local regulations.

7.0 WORK AREAS

Personnel will be instructed not to work outside the designated dredge and dredge slurry operation areas so as not to disturb surrounding vegetation and wildlife.

All personnel will be made aware of and understand the contents of this entire Environmental Protection Plan. The team will conduct worker-training sessions to acquaint all personnel with all phases of the Environmental Protection Plan.

APPENDIX A
SPILL PREVENTION PLAN

GENERAL INFORMATION

VESSELS AND EQUIPMENT ON PROJECT: (1) 8” Diesel Swing and Ladder Dredge; (2) 8” Diesel Mudcat 915 Horizontal Auger Dredge/Booster Pump; (1) 8” Diesel Skid Mounted Booster Pump; (2) 550 gallon double-wall diesel fuel tanks; (1) 150 gallon double-wall fuel boat; (1) Diesel Telehandler; (1) Diesel Excavator; (1) Diesel Front-end Loader; (1) Maintenance boat with gas powered outboard engine; (1) Personnel Jon boat with gas powered outboard engine; (1) Pontoon sampling boat with gas powered outboard engine; (2) Diesel Wastewater Treatment Plant Pumps; (1) Polymer Injection System; (3) Multi-media Vessels; (3) Granulated Activated Carbon Vessels; (1) 22,000 Effluent Storage Tank.

The equipment on this project powered with diesel engines are fueled by #2 diesel fuel. The equipment on this project powered with gas engines are fueled with unleaded gasoline. Diesel fuel, unleaded gasoline, and oil/lubricants will be stored in a secured location outside the flood zone.

A polymer system will be used to inject polymer into the dredge slurry to aid in the dewatering process. Only 5,000 pounds of polymer will be on-site at any given time. Polymer will be staged next to the tent in 55 pound bags outside the flood zone.

EMERGENCY COORDINATORS

The Emergency Coordinator (EC) is responsible for coordinating all activities with regard to an implementation of the Spill Plan. All emergency activities are under the direct control of the EC or an employee designated by the EC. The emergency coordinator or alternate will be available to respond to an emergency on a 24-hour basis.

The primary EC is the Project Manager who is normally on site from 7:00 am to 5:00 pm Monday through Saturday. The EC or designated alternate will be available to respond to an incident at the project site during any period of operation.

The EC and alternate are very familiar with all operations, locations or records, the layout and fuels/lubricants onboard the vessels. All team members have been instructed to call 911 and then notify the EC immediately in the event of a major spill. The team members have been instructed to notify the EC immediately in the event of a minor spill. A concise description of the appropriate response in case of a spill including the contact information for the EC and alternate is provided below. This information will be displayed on the dredge and at the job trailer.

The EC will assess the severity of the incident and determine the appropriate action necessary to mitigate the release. The EC will immediately notify the National Response Center, USEPA Project Manager, and WDNR Project Manager, if necessary. The agencies and groups that will be notified in the event of an emergency are listed in Table 1 of the emergency contacts section.

The following incidents will warrant a major spill.

- An uncontrolled untreated water spill from the dredge and/or dredge slurry operation

- An uncontrolled discharge of fuel or lubricant
- An uncontrolled off-site release of contaminated sediment

Whenever there is a major spill, call 911. The EC or designee will then immediately:

- Activate communication system to notify personnel;
- Notify appropriate local, state, and federal agencies as listed in Table 1; and
- Identify the material, exact source, amount and the real extent of any released materials and assess possible hazards to human health and the environment that may result from the situation.

Immediately following the emergency situation, the EC will:

- Provide the treatment, storage or disposal of any material recovered or contaminated from the discharge or cleanup;
- See that any material, which is potentially incompatible with the discharge material from the incident area, is removed or protected until cleanup procedures are completed;
- See that emergency equipment is cleaned and fit for its intended use before operations are resumed;
- Notify the appropriate local, state and federal authorities that the above steps have been completed, following the emergency situation;
- Record the time, date and details of incident and file a report as shown in Table 1.

EMERGENCY RESPONSE PROCEDURES

Emergency response procedures have been developed to effectively mitigate any spill that may arise at the project site.

A. Spill Response Procedures

1. Stop All Operations;
2. Call 911, if major spill;
3. Appraise EC of situation;
4. Block all possible routes to stop material from spreading; surround spill area; and
5. Contact the appropriate agencies, if reportable quantity.

B. Decontamination Procedures

1. Absorb spilled material with absorbent pads, booms, or absorbent dry.
2. All disposable clean up equipment (oil dry, booms, and non reusable pads) will be placed in drums as contaminated waste. Label containers as contaminated waste.
3. Dispose of all recovered wastes and contaminated equipment only at a permitted facility.

EMERGENCY EQUIPMENT

Materials for containing and cleaning up spilled materials from dredging will be located on the fuel boat, dredge, and booster pumps. These materials include absorbent booms, dry, and pads.

Materials for containing and cleaning up spill material at the dewatering area will be located in a secured area outside the flood zone. This includes absorbent pads, booms, and absorbent dry. Polymer material will be swept clean.

Radios will be available on the dredge, booster pumps, dewatering area and office trailer for summoning assistance in the event of an emergency or spill.

REQUIRED REPORTS

Any emergency requiring activation will be reported to the appropriate local, state, and federal agencies on the spill incident log sheet shown in Table 1.

TABLE 1
SHEBOYGAN RIVER SITE SPILL INCIDENT LOG SHEET

I. Initial Information Required

1.	Name of Informant: _____
2.	Phone Number: _____
3.	Location of Spill: _____
4.	Name of Injured and Type of Injuries (if applicable): _____ _____
5.	Substance Spilled: _____
6.	Amount Spilled (estimated): _____
7.	Extent of Spill: _____
8.	Rate Material Currently Spilling (if applicable): _____
9.	Time Spill Occurred (estimated): _____
10.	Time of Notification(s): _____
11.	Other information: _____

II. Spill Notification Sequence and Numbers:

1.	EC Ken A Radio or cell phone: (513) 518-2762 Alternate Scott McGee Radio or cell phone: (270) 589-9041	Time: _____
2.	Sheboygan Memorial Medical Center (if workers injured) (920) 451-5553 Hospital Poison Center: 1-800-815-8855	Time: _____
3.	Fire Department and Police Department 911 or (920)929-3700 for State Police	Time: _____
4.	National Response Center (NRC) (if RQ is exceeded) 1-800-424-8802	Time: _____
5.	USEPA Project Manager 1-312-353-2886	Time: _____
6.	WDNR Project Manager 1-920-892-8756 ext. 3028	Time: _____