



April 10, 2019

Ms. Carrie Stoltz
Wisconsin Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501

Re: North Stevens Street
Rhinelander, Wisconsin

Subject: Exemption Request for Management of Soil - Addendum

Dear Ms. Stoltz:

Thank you for your review of the soil management exemption for all sites along North Stevens Street. The purpose of this letter is to respond to the comments issued in the Wisconsin Department of Natural Resources (WDNR) emails dated April 6 and 9, 2019. Comments are addressed in the order they are presented in the email with the main bullet points from the April 6 email and sub-bullets of further inquiry in the April 9 email. All comments are provided in the context that the City of Rhinelander's reconstruction of roadway and utilities is along North Stevens Street from the cross street of Frederick to Chippewa Drive (Highway 17).

The purpose of this revised letter is to request a soil management exemption for all sites along North Stevens Street. It is submitted for your review and approval. The City of Rhinelander's contractor will be starting the week of April 15.

Two sites, 03-44-001220 Speedway Station and 03-44-000831 Gallo Property, with petroleum impacted soil were identified. It is possible unknown impacted soil will be encountered during the project. Soil at these locations will be managed under Wisconsin Administrative Code NR 718.

WDNR Bullet Point #1

- The previous version contained information about the treatment of contaminated groundwater, but that information was not in this recent version and needs to be put back in.
 - **Treatment of contaminated groundwater:** You stated you plan to sample the groundwater from the dewatering wells. What parameters will be used? Will you be storing the water onsite or somewhere else until the results are ready? You stated the contaminated water from the dewatering activities will be taken to the waste water treatment plant (WWTP), but plan to discharge the clean water. If you plan to discharge the clean water onto the surface, into the storm sewer or any of the other locations listed below, you will need to contact the Waste Water Program for a WPDES permit.

All groundwater dewatering systems will be visually and olfactory monitored for odor and sheen. If it is necessary, laboratory analytical results of groundwater will be used to determine water disposal options.

If treatment is required, any detection in laboratory analysis, water will be diverted to the City's wastewater treatment facility via the sanitary system.

Groundwater pumped at the location of 825 North Stevens Street during utility installation will be sampled to determine if it will need to be treated by the City's wastewater treatment facility. At the time of dewatering well installation, prior to pumping, a groundwater sample will be collected and analyzed for petroleum volatile organic compounds (PVOC) plus naphthalene.

The discharge of clean water from the dewatering system is being managed under a separate cover by another contractor.

WDNR Bullet Point #2

- There was no contingency plan for the management of unknown soil contamination. You can treat the unknown soil contamination as an immediate action and deal with it as an emergency action-notifying the department
 - **contingency plan for the management of unknown & known soils:** I need some construction clarifications, because I have concerns with your contingency plan for the known (Speedway & Gallo) and unknown soil contamination. When Brown, Kemp and Bruner Streets had sewer, waterline and utilities replaced, all the pavement, curbing, gutters and sidewalks were removed before the excavation began. There was little impervious surfaces left along the entire project corridor. The potentially contaminated soils need to be placed on an impervious surface per NR 718.05(2)(c). You stated that if no impervious surfaces are available, then the soils will be placed on plastic or other impervious material. Please be specific and state this in the plan. FYI: The department must be immediately notified per NR 718.19 if you are removing the contaminated soils as an immediate action.

Soil encountered at unknown locations will be managed in the same way as at the Speedway/Gallo properties. However, possible impacted soil will be laboratory analyzed to determine if the soil will be replaced or landfilled. Soil will be monitored for odors and staining along the entire project. If odors or staining is observed, the soil will be field screened using the photo ionization detector. Soil with a PID less than 10 will be considered non-impacted soil. Soil with a PID between 10 and 50 instrument units as isobutylene (iui) will be temporarily stockpiled on an impervious surface within the right of way and placed back where it came from. Soil with a PID greater than 50 will be temporarily stockpiled on an impervious surface within the right of way awaiting placement back where it came from, laboratory analysis, and/or hauled to the Lincoln County Landfill for proper disposal. Material with suitable fill qualities will be replaced in the excavation. Material unsuitable for backfill will be analyzed. Analyzed unsuitable material without impacts will be used without restriction while impacted unsuitable materials will be taken to the Lincoln County Landfill.

The WDNR will be notified if soil contamination is encountered.

WDNR Bullet Point #3

- The PID field screening is ok, however, you did not list any action levels. At what levels do you determine if the soils are impacted or not?
 - what point do you determine if soils are impacted? You stated you would use a PID screening level of 50 iui; other consultants use 10 iui for similar projects. Will you also

use olfactory, sheen, and discoloration? You stated that these items would be indicators to use the PID. Please include this information in the plan

Soil with PID greater than 10 iui will be considered impacted and treated as such. Impacted soil will be replaced in the excavation where it came from or hauled to the landfill for disposal. Soil will be monitored for odors and staining along the entire project. If odors or staining is observed, the soil will be field screened using the photo ionization detector. All PID readings will be using in conjunction with visual and physical observations. Soil with a PID less than 10 will be considered non-impacted soil. Soil with a PID between 10 and 50 iui will be temporarily stockpiled on an impervious surface within the right of way and placed back where it came from. Soil with a PID greater than 50 will be temporarily stockpiled on impervious surface within the right of way awaiting replacement in the same location, laboratory analysis, and/or hauled to the Lincoln County Landfill for proper disposal. Material with suitable fill qualities will be replaced in the excavation. Material unsuitable for backfill will be analyzed. Analyzed unsuitable material without impacts will be used without restriction while impacted unsuitable materials will be taken to the Lincoln County Landfill.

WDNR Bullet Point #4

- On page 2 of 3, you state the impacted soil will be managed by being stockpiled at the Gallo and Speedway sites, but you should be more specific. Exactly where on the properties, how long, will it be covered? Stockpiles will need to be covered if left overnight. Please refer to and follow the guidelines in NR 718.05(2) and also refer to the 1st attachment

Soil requiring management will be stockpiled within the City right of way, outside a floodplain, greater than 100 feet from wetlands, greater than 300 feet from surface waters, and greater than 100 feet of water supply well. The stockpiles will be held for no more than 14 days and managed per NR718.05(2). Stockpiles will be temporarily placed on impervious surface: asphalt or concrete within the right of way, asphalt or concrete at source property (if known), or 6-mil plastic sheeting (or similar). Stockpiles of contaminated soil remaining overnight will be covered with 6-mil plastic sheeting (or similar), anchored and shaped properly as to prevent exposure of contaminated soil.

WDNR Bullet Point #5

- A final construction documentation report needs to be submitted to the department
 - The final construction documentation report should tell the construction story including cross-sections, maps and figures. How much soil was removed or reused. How much groundwater was treated or put back onto the site.

A report documenting impacted soil encountered during the project will be prepared and submitted to WDNR. The report will include soil volumes and locations of impacted soil encountered. Maps illustrating residual soil will be included.

Soil Management Plan

The soil plan is to reduce further environmental impacts along North Stevens Street project plus reduce off-site disposal of soil. The plan will be as follows:

- Visual and olfactory observations of soil along the entire project area.
- If contaminated soil is encountered, the soil will be temporarily stock piled on an impervious surface, and covered with plastic or similar if precipitation is in the forecast or left overnight, and replaced in the same locations where it was excavated from.

- The contaminated soil area(s) will be delineated in the field using a PID and/or laboratory analysis.
- If contaminated soil is unable to be replaced, the soil will be hauled and disposed of at Lincoln County Landfill.

The soil management plan continues to abide by NR 726.13 conditions as the source sites were closed under and will follow management requirements in NR 718.12.

Conclusions and Recommendations

Estimated volumes of soil to be managed are based upon limited site investigations and WDNR approved closure reports. Actual volumes will be dependent on conditions encountered during excavations. Sand Creek will be on-site for the 825 and 909 N Stevens Street soil areas and will also be on-call to evaluate potential impacted soil that may be encountered during other project excavations.

If you have any questions or comments regarding the work that was performed or the site in general, please contact me via at 715.365.1818 or hollie.depuydt@sand-creek.com.

Sincerely,

SAND CREEK CONSULTANTS, INC.



Hollie DePuydt, PE
Environmental Engineer

cc/enc: Mr. Tim Kingman/City of Rhineland, via email only
Mr. Mark Barden/Town and Country Engineering, Inc., via email only