



April 17, 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 No. 2

Dear Ms. Stoltz:

Thank you for your review of the soil management exemption for 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) email dated April 12, 2019. Comments are addressed in the order they are presented in the 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 entire North Stevens Street utility and road construction project will be monitored for potential soil impacts.

- Page 2: The original request (3/7/19) mentions GW will need treatment. The Gallo property needs to be mentioned

*If there are impacts (laboratory detections), groundwater will be treated by the City of Rhinelander Wastewater Treatment Plant via sanitary sewer. Impacts to groundwater were identified at 03-44-001220 Speedway Station. If dewatering is conducted at Speedway, the groundwater will be re-evaluated to determine if the groundwater being pumped is impacted for proper management.*

*Groundwater impacted at 03-44-000831 Gallo Property at the time of case closure in 2003 was mapped to be on site only. During the December 2018 pre-construction investigation, a groundwater sample was collected and analyzed within the right-of-way adjacent to the previously mapped groundwater plume. The groundwater sample had no detects of petroleum volatile organic compounds plus naphthalene above laboratory detection limits; therefore, no treatment is required. Groundwater will continue to be visually and olfactory monitored.*

- Page 2: In your statement in response to my question about the management of GW. You stated that “discharge of clean water is being managed by another contractor”. Does this mean the other contractor got a discharge permit? If water does go the city WWTP, does the city require permit? Please state exactly whom is acquiring the discharge permit.

*The contractor managing the dewatering system and discharge permit is A-1 Excavating. The WPDES permit is being worked on. The City Wastewater Treatment Plant does not require a permit. They only require notification.*

- Page 2 & 3: The statements highlighted on pages 2 & 3 (see attached) need to be clarified. if >50 you may landfill? Please state exactly how the soil > 50 will be managed. The original request indicates you will manage in accordance to 718 and it mentions impervious surface, if you encounter possible impacted soils, you have to notify the department and deal with it accordingly.

**All Areas Outside of 03-44-001220 Speedway Station and 03-44-000831 Gallo Property**

*If potentially impacted soil is encountered outside the identified areas of 03-44-001220 Speedway Station and 03-44-000831 Gallo Property, the **WDNR will be notified**. With approval of the WDNR, one of the following three options will be requested: place potentially impacted soil back where it came from, submit for laboratory analysis, or haul to the Lincoln County Landfill for proper disposal.*

*All potentially impacted soil will be temporarily placed on impervious surface (asphalt, concrete, or 6-mil plastic sheeting [or similar]) within the right-of-way. 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.*

*The significance of waiting for a laboratory analytical analysis is it is possible that a potential contamination will result in no laboratory detects.*

**03-44-001220 Speedway Station and 03-44-000831 Gallo Property**

*Soil with a PID greater than 50 (and between 10 and 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.*

*All potentially impacted soil will be temporarily placed on impervious surface within the right-of-way. Stockpiles will be temporarily placed on impervious surface: asphalt or concrete within the right of way, asphalt or concrete on source property, or 6-mil plastic sheeting within the right of way (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.*

*The significance of waiting for a laboratory analytical analysis is it is possible that a PID > 50 will have no laboratory detects.*

- If possible, please provide cross-sections in the final documentation report

*A report documenting impacted soil encountered during the project will be prepared and submitted to WDNR including cross-sections.*

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](mailto: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