

**From:** James, Andrew G - DNR  
**Sent:** Monday, April 6, 2020 1:58 PM  
**To:** Kathie VanPrice (Kathie.VanPrice@dot.wi.gov)  
**Cc:** Sharlene - DOT TeBeest (Sharlene.TeBeest@dot.wi.gov); Haak, Daniel  
**Subject:** Concurrence to special provisions regarding the Amended Final Report: Phase 2.5 Investigation, Racine St Bridge – 1st St to Ahnaip St in Menasha, Winnebago County (WisDOT ID 4992-03-00)

Kathie,

The WDNR has reviewed the document titled, “Phase 2.5 Investigation, Racine Street Bridge, 1<sup>st</sup> Street to Ahnaip Street, Menasha, Winnebago County, Wisconsin”, dated as, Amended November 2019, October 2019, for WisDOT Project # 4992-03-00 prepared for the Wisconsin Department of Transportation by TRC. TRC requested that WDNR provide concurrence to the Special Provisions and material management plan related to this road project.

Based on review of the above-named report WDNR concurs:

- With the handling and waste characterization of contaminated and potentially contaminated soil and groundwater to be generated from the following locations
  - PVOC contamination from Station 1+47 NB to 2+50 NB, from reference line to limits on LT
    - Concentrations and contaminants found at GB5/TW2 are consistent with the open BRRTS case, LSC Communications – LGU – BRRTS # 03-71-580159
    - Concurrence for this specific area was provided on February 14, 2020
  - PVOC contamination from Station 20+37 NB to 21+05 NB, from reference line to limits on RT
    - Concentrations and contaminants found at GB9 are consistent with the closed BRRTS case, Barth Property (Former) – BRRTS # 03-71-001607
  - PVOC contamination from Station 18+35 NB to 19+35 NB, from reference line to limits on RT
    - Concentrations and contaminants found at GB7 are consistent with the closed BRRTS case, Ziel Property – BRRTS # 03-71-002162
  - PVOC contamination from Station 1’B’+67 to 2’B’+15, from reference line to limits on RT
    - Concentrations and contaminants found at GB7 are consistent with the closed BRRTS case, Ziel Property – BRRTS # 03-71-002162
  - Metals contamination from station 2+50 NB to 3+00 NB between 0 to 6 ft. bgs, from reference line to northwestern side of former Banta Publishing Corporation building
    - Concentrations and contaminants found at GB11 and GB14 are consistent with open BRRTS case, LSC Communications – LGU – BRRTS # 03-71-580159
    - Concurrence for this specific area was provided on February 14, 2020
  - PAH and metals contamination from Station 8+00 NB to 8+50 NB, from limits on LT to limits on RT
    - Concentrations and contaminants found at GB1 are consistent with the open BRRTS case, LSC Communications-Northern Peninsula-LGU – BRRTS # 03-71-584512
- That material excavated in the above locations be field screened by an environmental professional

- Soil with significant petroleum contamination will be treated and disposed at a WDNR licensed bioremediation facility
  - Soil is considered to have significant petroleum contamination if it exhibits significant petroleum odor, staining, and/or elevated PID readings (for example, PID readings greater than 10 ppm)
- Soil excavated in areas of known PAH and/or metals contamination that cannot be reused as backfill will be disposed at a WDNR-licensed landfill
- With the handling and waste characterization of contaminated sediment to be generated and disposed of at a licensed landfill within the area of the following sampling locations
  - PAH and metals contamination at sampling locations SB1, SB2, SB3
- With the landfilling of an estimated 10,000 tons of contaminated sediment at a licensed landfill

WDNR recommends the following additional comments/revisions to the Special Provisions:

- Soil as determined by analytical results to have low level PAH and/or metals contamination may be reused within the immediate limits of construction within the vicinity of where it was excavated
- Soil as determined by analytical results to have low level PVOC contamination may be reused within the immediate limits of construction within the vicinity of where it was excavated
- Dissolved metals groundwater contamination in the area of GB2/TW1
  - If dewatering occurs in this area, the contractor should be responsible for properly handling and disposing of water contaminated with metals.
- If any dredged sediment is planned for reuse within an upland area and in the limits of construction, prior approval will need to be obtained from the WDNR Waste Program

WDNR recommends stockpiling and sampling in accordance with Wis. Admin. Code ch. NR 718 if any potentially contaminated material is encountered other than the material previously identified in the phase 2.5 investigation. The WDNR also recommends utilizing the “Exempt Soil Guidance” and Wis. Admin. Code ch. NR 718 when managing soils.

Provided these and all conditions of the above-listed document are specifically adhered to as related to the roadwork project, this correspondence is provided to convey WDNR’s concurrence with the activities as outlined in the excavation management plan and special provisions within the report.

Sincerely,

Andy James

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**Andrew James**

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