

From: Braun, Jessica J - DNR
Sent: Wednesday, May 15, 2024 7:55 AM
To: Miller, Roger; Bruni, Katherine - DOT; Haen, Brian - DOT
Cc: Schmenk, Colin R -DNR; Seymour, Madi
Subject: RE: Special Provisions Concurrence for USH 10/ Eds Auto Body Phase 2 project, Reedsville, Manitowoc County, Wis DOT ID: 1500-75-00 (BRRTS No. 03-36-548835)

Good morning,

The email provided will be sufficient in describing the potential reuse of petroleum and lead contaminated soil. In the future, mention PVOC and lead contamination separately in the Special Provisions if possible.

Thank you,

Jessi

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Jessi Braun

She/Her

Phone: (715) 214-4816

jessica.braun@wisconsin.gov

From: Miller, Roger <rmiller@geiconsultants.com>
Sent: Friday, May 3, 2024 11:27 AM
To: Braun, Jessica J - DNR <jessica.braun@wisconsin.gov>; Bruni, Katherine - DOT <katherine.bruni@dot.wi.gov>; Haen, Brian - DOT <Brian.Haen@dot.wi.gov>
Cc: Schmenk, Colin R -DNR <colinr.schmenk@wisconsin.gov>; Seymour, Madi <MSeymour@geiconsultants.com>; Miller, Roger <rmiller@geiconsultants.com>
Subject: RE: Special Provisions Concurrence for USH 10/ Eds Auto Body Phase 2 project, Reedsville, Manitowoc County, Wis DOT ID: 1500-75-00 (BRRTS No. 03-36-548835)

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Hi Jessica,

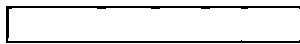
We appreciate the WDNR's concurrence with the Special Provisions for the USH 10 improvement project. Per our telephone conversation at 10:50 AM today regarding the last bullet in your email below (Special Provisions Comments), we understand it is reasonable to consider lead impacts as also being associated with the closed LUST case (including leaded gasoline distribution from the historic UST system) and that the term "petroleum-contaminated soil" as used in the Special Provisions would also apply to lead impacts as a component of the petroleum contamination source.

Consistent with similar sidewalk and ramp upgrade projects, it is reasonable to anticipate that the small quantity of soil to be removed for construction will be directly hauled to a licensed landfill for treatment/disposal. Even if the material could be classified as “low-level petroleum contaminated soil,” it would be unlikely that a nearby area within the project would be available to accommodate the soil for reuse as fill material. Nevertheless, the WisDOT project team would reach out to the WDNR for concurrence on the reuse of soil from this sidewalk/curb ramp improvement area as fill within the project if that were identified as a preferred or likely material management option in the future.

Please let us know if this clarification to the Special Provisions is sufficient for your records and can be incorporated into the WDNR’s concurrence. Contact us with any further questions or comments.

Thank you and have a good weekend.

GEI ROGER A. MILLER, P.G., C.P.G.
Senior Hydrogeologist
920.455.8657 cell: 920.737.6373
3159 Voyager Drive, Green Bay, WI 54311



From: Braun, Jessica J - DNR <jessica.braun@wisconsin.gov>
Sent: Friday, May 3, 2024 10:34 AM
To: Bruni, Katherine - DOT <katherine.bruni@dot.wi.gov>; Haen, Brian - DOT <Brian.Haen@dot.wi.gov>; Miller, Roger <rmiller@geiconsultants.com>
Cc: Schmenk, Colin R -DNR <colinr.schmenk@wisconsin.gov>
Subject: [EXT] Special Provisions Concurrence for USH 10/ Eds Auto Body Phase 2 project, Reedsville, Manitowoc County, Wis DOT ID: 1500-75-00 (BRRTS No. 03-36-548835)

EXTERNAL EMAIL

Good Morning,

DNR has reviewed the Phase 2 Environmental Site Assessments (ESA) and special provisions submitted to the Department of Natural Resources (DNR) on February 19, 2024, for the USH 10, Reedsville, Manitowoc County, Wisconsin] project (WisDOT Project ID #: 1500-75-00). The Phase 2 ESA special provisions identified one site which may impact areas of construction. The project scope includes installation of curb ramps at 6th, 4th, and 3rd street intersections (excavations expected to only extend down to 1.5 feet bgs). This email serves as the DNR concurrence with the special provisions with the following comments and recommendations:

Site 3: Former Eds Auto Body located at 345 Main Street, Reedsville, WI

- **Historic Site Contamination/Site History:**
 - The site was operated as a gas station for approximately 15 years, and an automobile repair facility for at least 35 years stated in a previous Phase I ESA.

- Two 1,000-gallon gasoline underground storage tanks (USTs) and associated piping were located north of the structure on site.
 - Tanks were removed from the site in September 1991.
 - Closed case Eds Auto Body (BRRTS No. 03-36-458835) had historic sampling on the north side of the building next to the former tank bed and former dispenser island associated with the gasoline tanks. Detections of petroleum volatile organic compounds PVOCs discovered near former tank bed into the ROW (2-6 feet bgs).
- Phase 2.5 ESA Comments:
 - Three soil borings (EBS-1 through EBS-3) were advanced with two soil samples collected from each boring within the existing ROW and planned strip acquisition area.
 - Soil Analysis (VOCs + RCRA Metals):
 - Soil samples, EBS-1 (0-2 feet bgs), EBS-1 (2-4 feet bgs), EBS-2 (2-4 feet bgs), and EBS-3 (0-2 feet bgs), had concentrations of lead exceeding the soil to groundwater pathway and background threshold value. Concentrations were 259 mg/kg, 55.7 mg/kg, 89.1 mg/kg, and 54.7 mg/kg, respectively.
 - Soil sample, EBS-1 (2-4 feet bgs), had an exceedance above the groundwater pathway (Benzene at 0.691 mg/kg, Trimethylbenzene at 197.6 mg/kg, and Xylene at 129 mg/kg).
 - Soil sample, EBS-1 (2-4 feet bgs), had an exceedance above the non-industrial direct contact (Ethylbenzene at 22.8 mg/kg and Naphthalene at 14.2 mg/kg).
 - DNR has determined that concentrations found during the Phase II environmental site assessment are residual concentrations from the closed Eds Auto Body site.
- Special Provisions Comments:
 - Revise Special Provisions to include proper handling of lead-impacted soil. If reuse of impacted materials is desire, please send a brief materials management plan to DNR that includes amount of material to be moved, what the contaminants of concern are, and where the material is proposed to be moved to.

Best,

Jessi Braun

She/Her

Hydrogeologist – Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

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