

## James, Andrew G - DNR

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**From:** Lauridsen, Keld B - DNR  
**Sent:** Tuesday, February 19, 2019 4:12 PM  
**To:** Mark Walter  
**Cc:** VanPrice, Kathie - DOT; Chronert, Roxanne N - DNR; James, Andrew G - DNR  
**Subject:** RE: REVISED: Concurrence with Special Provisions for WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI

Mark,

The DNR concurs with your proposed sampling plan to characterize excess soil likely generated during the upcoming DOT construction project referenced above. Please provide the analytical results, when available, for DNR review.

Let me know if we need to discuss anything further.

-Keld

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**Keld B. Lauridsen**

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

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**From:** Mark Walter <Mark.Walter@obg.com>  
**Sent:** Monday, February 18, 2019 10:15 AM  
**To:** Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>; James, Andrew G - DNR <andrew.james@wisconsin.gov>  
**Cc:** VanPrice, Kathie - DOT <Kathie.VanPrice@dot.wi.gov>  
**Subject:** RE: REVISED: Concurrence with Special Provisions for WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI

Hi all,

OBG is requesting concurrence, on behalf of the WisDOT, with the following sampling plan for characterization of soil to be excavated outside of the areas currently called out as petroleum- or PCB-contaminated in the previously reviewed special provisions. Please note the quantity of additional soil being characterized is approximately 300 CY (see p.2 of attached). The number previously provided of approximately 983 CY included pavement and base course material.

- One shallow (approximately 5' bgs) soil probe boring will be advanced on each side of the bridge.
- Proposed boring locations (see p.1 of attached) are near locations of planned sewer excavation, expected to generate the majority of the quantity of soil to be characterized by supplemental investigation.
- One soil sample from each boring location to be collected for laboratory analysis of VOCs, RCRA metals, PCBs, and PAHs.
- Interval of approximately 2' – 5' bgs will be targeted for sample collection. Considering boring logs from Ph 2.5 Investigation and plan sheets for existing Pennsylvania Ave. section, top 2' bgs consists of pavement and base course material, followed by fill material from approximately 2' – 5' bgs. Clay soils were encountered at depths beneath 5' bgs. The WDNR has stated that dredge spoils may have been placed along the river banks as fill

material, thus, the interval where fill material has been observed will be targeted for sample analysis. Borings will be logged and adjustments may be made depending on field observations.

- If the following criteria are met, soils (excluding those already called out in the previously reviewed special provisions) excavated to facilitate construction will be designated as acceptable for on- or off-site reuse. If the following criteria are not met, the soils will either be designated for landfill disposal, or alternative reuse options may be considered in coordination with, and with approval from, WDNR.
  - VOCs not detected above laboratory's Reporting Limit/Limit of Quantification
  - PCBs not detected above laboratory's Reporting Limit/Limit of Quantification
  - Metals less than BTVs, or less than most restrictive NR 720 RCL, if that level is greater than the BTV
  - PAHs less than groundwater pathway RCLs, and less than non-industrial direct contact RCLs (if a 7cPAH compound exceeds an individual direct contact RCL, cumulative assessment may be used)

Please let me know if you have any comments or questions and provide concurrence as soon as possible. The additional investigation is scheduled to occur on Wednesday, February 20<sup>th</sup>.

Thanks,

Mark

**Mark D. Walter, PE**

OBG | Senior Engineer

414-837-3563 | c 608-220-2480

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**From:** Chronert, Roxanne N - DNR [<mailto:Roxanne.Chronert@wisconsin.gov>]

**Sent:** Wednesday, January 30, 2019 1:06 PM

**To:** Mark Walter <[Mark.Walter@obg.com](mailto:Mark.Walter@obg.com)>

**Cc:** Lauridsen, Keld B - DNR <[Keld.Lauridsen@wisconsin.gov](mailto:Keld.Lauridsen@wisconsin.gov)>; James, Andrew G - DNR <[andrew.james@wisconsin.gov](mailto:andrew.james@wisconsin.gov)>

**Subject:** FW: REVISED: Concurrence with Special Provisions for WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI

Hi Mark,

Below is the amended DNR concurrence with the Special Provisions for this project:

The Wisconsin Department of Natural Resources (DNR) reviewed the Phase 2.5 investigation report (the report) received on October 9th, 2018, for the WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI (the project) and the hazardous material special provisions.

**Background**

The Wisconsin Department of Transportation (DOT) contracted O'Brien & Gere Engineers Inc. (OBG) for the project. OBG performed a Phase 2.5 investigation in response to a hazardous materials assessment dated March 7, 2018, completed by Kapur & Associates Inc (Kapur). OBG and DOT agreed on the findings of Kapur which highlight three potential sources of hazardous materials in the vicinity of the Pennsylvania Avenue Bridge and approaches:

- The Sheboygan River and Harbor:
  - Superfund Site Sheboygan River & Harbor (SF NPL) 02-60-529589. Moderate to high levels of Arsenic, Chromium, Lead, Zinc and Polychlorinated Biphenyls (PCBs). Investigation and remediation has continued since the 1970s.
- 505 South Commerce Street:
  - Site appears in National Pollutant Discharge Elimination System (NPDES) and Recovered Government Archive (RGA) Leaking Underground Storage Tank (LUST) databases. Visible on Sanborn Fire Insurance

(Sanborn) maps from 1949, 1955, 1967, was a filling station/auto repair shop with tanks, and a gasoline house on a 1903 Sanborn map.

- 927 Pennsylvania Avenue:
  - 1949 & 1955 Sanborn maps show a filling station/auto repair facility on this site with gasoline storage tanks visible.

### **Management of Soil**

The DOT, being the generator of the excavated material must ultimately determine how to characterize the soil. Soil characterization does encompass a representative sampling of soil for any parameter of concern which can reasonably be expected within the limits of the construction area/project. Constituents analyzed are selected based on, reasonably derived and attainable data.

Characterization of any generated soils is left at the generators discretion. It is in the best interest of both the generator and any property owner who may accept the soil to ensure that an acceptable soil determination has been made. The generator and the receiving property owner could be held responsible for cleaning up the contamination in accordance with Wis. Stat. ch. 292.11 if the material would result in a discharge of a hazardous substance or environmental pollution.

### **DNR Concurrence**

Soil samples provided in the Phase 2.5 investigation report identified petroleum volatile organic compounds (PVOCs) and PCBs. Therefore, based on the information provided in the Phase 2.5 investigation report, the DNR concurs with the Special Provisions within the defined project limits for the handling and disposal of PCB and petroleum impacted soils.

The Department cannot give concurrence that the remaining material is properly characterized for proper management as exempt soil. The DOT, being the generator of the excavated material must ultimately determine how to characterize the soil.

As a general rule, the DNR recommends reusing of any excavated exempt material on-site.

Please let me know if you have any questions.

Thanks,

Roxanne N. Chronert

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### **Roxanne Nelezen Chronert**

Northeast Region Remediation and Redevelopment Team Supervisor

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**From:** Mark Walter <[Mark.Walter@obg.com](mailto:Mark.Walter@obg.com)>

**Sent:** Friday, January 18, 2019 2:46 PM

**To:** James, Andrew G - DNR <[andrew.james@wisconsin.gov](mailto:andrew.james@wisconsin.gov)>

**Cc:** Lauridsen, Keld B - DNR <[Keld.Lauridsen@wisconsin.gov](mailto:Keld.Lauridsen@wisconsin.gov)>

**Subject:** RE: Concurrence with Special Provisions for WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI

Hi Andy,

Thank you for providing a concurrence letter for the special provisions for the management of PCB- and petroleum-contaminated soil associated with the above-referenced project. However, the letter provided does not follow the typical form of concurrence letters that the WisDOT receives from its WDNR RR Program Liaisons.

Please review the attached and let me know if you are able to revise the concurrence letter for the Pennsylvania Ave. project to more closely follow the language provided in this example. Specific suggested edits include:

- Referencing the specific areas/stationing provided in the special provisions.
- Removal of language stating, “common historic practices along navigable waterways suggest dredging practices and/or filling with soil and/or waste fill from unknown sources may have impacted river banks.”
- Removal of language stating that characterization of any generated soils is left at the generator’s discretion and suggests reuse of any excavated exempt material on site.

The language in the current version of the concurrence letter implies that the characterization provided in the Ph 2.5 Investigation Report and Special Provisions is incomplete. WDNR Guidance states that, “if there is any reason to believe that a release of contaminants has impacted the soil...analytical testing of the material will be needed to determine how it must be managed.” The Phase 1 HMA Report for the above-referenced project recommended soil analysis of PVOCs and lead, based on potential sources, and PCB analysis of soil beneath the bridge based on potential interaction with river water/sediments. These parameters were analyzed, as discussed in Ph 2.5 Investigation Report for the project. Based on generator knowledge, there is no documentation available to suggest that additional releases have potentially impacted all soils within the Pennsylvania Ave. project area. OBG and the WisDOT do not believe that additional characterization is necessary, unless field observations during excavation for construction suggest otherwise.

Thanks,

Mark

**Mark D. Walter, PE**

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**From:** James, Andrew G - DNR [<mailto:andrew.james@wisconsin.gov>]

**Sent:** Monday, January 14, 2019 3:36 PM

**To:** Mark Walter <[Mark.Walter@obg.com](mailto:Mark.Walter@obg.com)>

**Cc:** Lauridsen, Keld B - DNR <[Keld.Lauridsen@wisconsin.gov](mailto:Keld.Lauridsen@wisconsin.gov)>

**Subject:** Concurrence with Special Provisions for WisDOT ID 4996-25-00 Pennsylvania Avenue Bridge and Approaches – Sheboygan, WI

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The Exempt Soil Management Guidance (Guidance Document RR-103) can be utilized to distinguish between naturally and non-naturally occurring compounds in soil. It states that soil may be managed as "exempt soil" if the criteria in the guidance document is met.

## DNR Concurrence

Based on the information provided and conversations with consultant Mr. Mark Walter of OBG, the DNR concurs with the following from the Special Provisions:

- Handling and disposal of PCB-contaminated soil
- Handling and disposal of petroleum-contaminated soil

If at all possible, the DNR suggests reuse of any excavated exempt material on-site.

Please let me know if you have any questions.

Thanks,

Andy

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**Andrew James**

Hydrogeologist –Remediation & Redevelopment Program

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