

## Hunt, John T - DNR

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**From:** Hunt, John T - DNR  
**Sent:** Monday, May 6, 2024 9:22 AM  
**To:** Lennie, Brian  
**Cc:** Christian Zuidmulder; Gross, Stu; Graham, Joseph R - DNR; Sager, John E - DNR; Saari, Christopher A - DNR; Cull, Whitney; Morberg, Kyle  
**Subject:** RE: Vent Abandonment - C. Reiss Project

Brian,  
Your response (below) does satisfy our request for additional information.

During your work activities at the venting system location, if you encounter contaminated soil that requires removal/disposal please collect confirmation samples from the excavation and document activities.

Your request is approved. This email serves as a notice to proceed, a formal approval correspondence will follow.

If you have any comments or questions regarding this issue please feel free to contact me.  
--John

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### John T. Hunt P.G.

Hydrogeologist – Remediation and Redevelopment  
Wisconsin Department of Natural Resources  
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Peshtigo, Wisconsin 54157  
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**From:** Lennie, Brian <Brian.Lennie@stantec.com>  
**Sent:** Friday, May 3, 2024 3:24 PM  
**To:** Hunt, John T - DNR <JohnT.Hunt@wisconsin.gov>  
**Cc:** Christian Zuidmulder <christian.z@thecreiss.com>; Gross, Stu <stu.gross@stantec.com>; Graham, Joseph R - DNR <Joseph.Graham@wisconsin.gov>; Sager, John E - DNR <John.Sager@wisconsin.gov>; Saari, Christopher A - DNR <Christopher.Saari@wisconsin.gov>; Cull, Whitney <Whitney.Cull@stantec.com>; Morberg, Kyle <kyle.morberg@stantec.com>  
**Subject:** RE: Vent Abandonment - C. Reiss Project

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Good afternoon John,

We appreciate your review. In response to your request, we are providing additional information regarding existing soil conditions and plans to address contaminated soil, if encountered.

As illustrated on the attached cut extent figure from the C. Reiss project Materials Management Plan (MMP), an average of four feet of soil has been excavated where the rail line enters C. Reiss property from the east. Consistent with the MMP, soils were monitored during excavation with no visual or olfactory evidence of petroleum contamination. A photograph of the excavated rail alignment taken from the east end of the rail cut, looking westward is attached (note the undisturbed vent line across the rail alignment). As shown in the photograph, native soils (encountered approximately two feet below grade, beneath topsoil) consisted of red-brown clay, which is consistent with previous investigation data, some of which is discussed below:

- Stantec soil boring STN1 was installed in 2022 approximately 15 feet west of the vent system to assess soil quality associated with the rail cut. No evidence of petroleum contamination (visual, olfactory, or elevated photoionization detector readings) was observed.
- Monitoring well MW-31 was installed approximately 100 feet southeast of the vent system in 1989 and was routinely monitored through 2022. It was abandoned by Antea in 2023 to facilitate the installation of the rail line; no evidence of product or petroleum contamination to groundwater was documented in any sampling event, nor in soil during well installation in 1989. Groundwater was approximately 15 feet below grade, with a north-northwesterly flow direction.

Soils excavated from the rail alignment to date have been completed in compliance with the MMP for the C. Reiss project. Remaining soil surrounding the vent system that has not yet been excavated is present in an area measuring approximately 20 feet wide (centered on the vent system), 100 feet long (the width of existing rail cut), and 4 feet deep (illustrated on the attached figure) and represents approximately 300 cubic yards of soil. Given the reason for construction of the vent system and potential for contaminated soil to be present in proximity to it, we intend to continue monitoring and screening soils for evidence of contamination during removal. If none is found, excavated soil will continue to be placed within the MMU 1 berm. However, if evidence of contamination is encountered, impacted soils will be segregated from non-impacted soils, temporarily stockpiled onsite (i.e., adjacent to location where it was excavated from) in accordance with ch. NR 718.05 Wis. Admin. Code, and laboratory analyzed to evaluate disposal options.

In regard to the concern of the rail line representing a structural impediment, the rail cut will remove impacted soils (if present) within the rail alignment to a depth of approximately 4 feet. If, based on field observations, contamination is present and extends deeper than 4 feet, the cut could be extended further to remove soils with evidence of petroleum contamination thereby eliminating contamination within the rail cut and the rail line as an impediment. If this occurs, final excavation floor conditions will be documented via photoionization detector readings and photographs.

As you are aware, construction activities are ongoing, and the vent system is an obstacle to completion of the rail cut. Therefore, anything you can do to expedite review would be appreciated. We trust this information satisfies your request.

If you have questions or need further information to approve the removal of the vent system within the rail cut, please let us know.

Thanks,  
Brian

**Brian Lennie**

Senior Associate/Senior Scientist

Direct: 262-643-9061

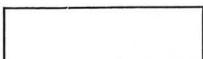
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**From:** Hunt, John T - DNR <JohnT.Hunt@wisconsin.gov>  
**Sent:** Thursday, May 02, 2024 1:19 PM  
**To:** Lennie, Brian <Brian.Lennie@stantec.com>  
**Cc:** Christian Zuidmulder <christian.z@thecreiss.com>; Gross, Stu <Stu.Gross@stantec.com>; Graham, Joseph R - DNR <Joseph.Graham@wisconsin.gov>; Sager, John E - DNR <John.Sager@wisconsin.gov>; Saari, Christopher A - DNR <Christopher.Saari@wisconsin.gov>  
**Subject:** Vent Abandonment - C. Reiss Project

Brian,

This morning the Department of Natural Resources (DNR) discussed your request regarding the abandonment of the vent stacks.

The DNR has concerns about the potential for contaminated soil underlying the proposed RR grade location. Based on the limited soil sampling data available from the November 2003 pipeline removal project, significant soil contaminant concentrations were documented beneath the piping. When constructed, the RR grade would be considered a structural impediment which may have repercussions regarding future investigative or remedial activities. A structural impediment would also necessitate the application of continuing obligations under Wisconsin Statute § 292.12(2)) as part of an approval for this action.

Your proposal does not include any detail about existing soil conditions or contamination in this area or plans for what happens if you encounter contaminated soil. We are requesting additional information be provided regarding these issues before making a decision on the request.

If you have comments please feel free to contact me.

--John

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### **John T. Hunt P.G.**

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