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Report: **Weekly Progress Report**

Project: **Former Two Rivers MGP Site  
Removal Action Construction  
Two Rivers, Wisconsin**

Date: October 28, 2014

Prepared By: Natural Resource Technology, Inc.  
Mark D. Walter, PE  
Kenneth R. Mika, PE

Submitted To: Integrys Business Support, LLC  
Naren M. Prasad, PE  
Stacy A. Brault

Activity Period: October 6 through October 12, 2014

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Natural Resource Technology, Inc. Personnel on Site

- Mark Walter, **Field Engineer**
- Andrea Salus, **Field Engineer**
- Dan Vachon, **Field Technician**
- Kenneth Mika, **Project Manager**
- Steve Wiskes, **Health and Safety Manager**

Integrys/Wisconsin Public Service Corporation Personnel on Site

- Stacy Brault

Geo-Solutions, Inc. Personnel on Site

- Keith Adamson
- Aaron Handel
- Eric Shannon
- Jason Greggs
- Rob Kautchick
- Dylan Ice
- Bob Lager
- Randall Tilly
- John Scott
- Darin Payne
- Amy Grass

U.S. EPA Personnel on Site

- Christopher Redfearn, **OTIE**

#### Subcontractors on Site

- Asbestos Removal, Inc., **Asbestos Pipe Removal Contractor**

#### Others

- Don Conner, **WPS**
- John Walters, **WPS**

#### Visitors

- Tom Wentland, **WDNR**

This report summarizes field activities performed by NRT, GSI, and GSI's subcontractors, on behalf of IBS at the former Two Rivers MGP Site Time Critical Removal Action:

#### Site Activities

##### Removal Action Totals:

- Soil Direct Disposal through 10/12/14: 2,871.77 Tons
- Debris Direct Disposal (Concrete and Wood) through 10/12/14: 1038.95 Tons
- Total Direct Disposal through 10/12/14: 3,910.72 Tons
- In-Situ Solidification/Stabilization (ISS) through 10/12/14: 7,689.16 Cubic Yards

##### Site Perimeter Air Monitoring:

- Real-time site perimeter air monitoring for TVOCs and PM<sub>10</sub> was conducted 24 hours per day, all seven days of the week. The locations of the perimeter air monitoring stations are shown on Figure 1.
- A total of 12 SUMMA canister samples were collected, including two samples at each of the five air monitoring station locations, one field blank sample, and one duplicate sample. SUMMA canister samples were analyzed for BTEX compounds and naphthalene. A summary of the analytical results is presented in Table 1.
- A total of six PUF samples were collected, including one sample at each of the five air monitoring station locations and one field blank sample. PUF samples were analyzed for PAH compounds. A summary of the analytical results is presented in Table 1.

#### NRT

- Participated in daily safety meetings to evaluate potential safety concerns for the day's planned construction activities.
- Oversaw GSI's mobilization efforts throughout the week.
- Oversaw GSI's preparation of an ISS work pad.
- Oversaw GSI's ISS drilling.
- Collected and prepared six ISS Construction Quality Assurance (CQA) samples (ISS-PR53-T, ISS-CU15-B, ISS-CL2-T, ISS-CK7-M, ISS-CM9-B, and ISS-CK13-T).
- Shipped 12 ISS CQA samples from ISS Pilot Test Columns for UCS (ASTM D1633) and hydraulic conductivity (ASTM D5084) laboratory testing by Timely Engineering Soil Tests (T.E.S.T.).

- Received and reviewed ISS CQA sample test results for UCS and hydraulic conductivity. Results are compared to ISS performance goals established in the Removal Action Work Plan (RAWP) Addendum 1 Construction Quality Assurance Project Plan (CQAPP).
- Oversaw GSI's weekly erosion control inspection on Monday (10/6).
- Oversaw GSI's excavation of peat material in the eastern portion of the ISS Area.
- Oversaw the removal of abandoned gas lines wrapped with asbestos containing materials (ACM). The pipes were exposed by GSI and removed by Asbestos Removal, Inc.
- Oversaw GSI's demolition and removal of underground concrete structures.
- Issued truck manifests for disposal of wood piling debris, concrete debris, and peat material.
- Performed perimeter air monitoring and sampling.
- Monitored site conditions for traffic flow, fugitive dust, odors, and general overall safety.

#### Geo-Solutions Inc.

- Continued mobilization of equipment in preparation of ISS construction activities.
- Continued constructing housing for the ISS batch plant.
- Continued removal of peat material in the eastern portion of the ISS Area.
- Began off-site trucking and disposal of wood piling debris.
- Continued demolition and removal of underground concrete structures.
- Continued off-site trucking and disposal of concrete debris and peat material.
- Continued constructing an ISS work pad.
- Continued full-scale ISS drilling.
- Began exposing abandoned gas lines wrapped with asbestos containing material (ACM) for removal by Asbestos Removal, Inc.
- Performed weekly erosion control inspection on Monday (10/6).
- Implemented fugitive emission controls including spraying Rusmar odor control foam on material stockpiles and disturbed areas, covering of inactive stockpiles, operation of an odor control perimeter misting system, and sequencing of work to minimize material handling.
- Conducted periodic worker health and safety air monitoring in the work (exclusion) zone.

#### Changes to Scope of Work

- GSI submitted an RFI regarding importing approximately 500 tons of fill material to help build an ISS drilling platform. This RFI was approved by IBS. Fill material was imported and began being used for drilling platform construction on Thursday (10/9).

#### Open/Outstanding Items

- Discussions regarding the ordinary high water mark (OHWM) are ongoing.

#### Work planned for the week of October 13 through October 19, 2014

- Continue to expose and remove abandoned gas lines and associated asbestos-containing pipe wrap for off-site disposal.
- Expose and remove U.S. Oil pipeline.
- Continue to excavate peat material in the Excavation Area and ISS Area.



- Continue off-site trucking and disposal of peat material and wood debris.
- Continue soil confirmation sampling at the limits of the Excavation Area.
- Continue construction of an ISS work pad.
- Continue full-scale ISS.
- Continue ISS CQA sampling.
- Continue perimeter air monitoring and sampling.
- Continue implementation of fugitive emission controls.

A Weekly Progress Report will be issued throughout the duration of field activities for this Time Critical Removal Action. A written report summarizing the results of the Removal Action will be provided following completion of all field activities.

Please contact us if you have any questions.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

A handwritten signature in black ink that reads 'Kenneth R. Mika'.

Kenneth R. Mika, PE  
Environmental Engineer

Attachments:

Field Photos  
Figure 1: Air Monitoring Station Locations  
Table 1: Weekly Air Data Summary

[P:\1500\1569\Construction\Field Reports\Weekly Reports\1569 NRT Two Rivers MGP Weekly Report 10-06-14 To 10-12-14.Docx]



### Field Photos:



**Photo 1:** Removed underground concrete structures.

**Direction:** Facing southwest

**Photo Date:** 10/7/2014

**Photo Taken By:** MDW



**Photo 2:** ISS drilling.

**Direction:** Facing west

**Photo Date:** 10/9/2014

**Photo Taken By:** MDW



**Photo 3:** Asbestos pipe removal.

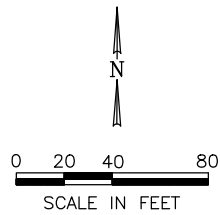
**Direction:** Facing west

**Photo Date:** 10/10/2014

**Photo Taken By:** DJV




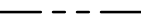


Sep 24, 2014 8:34am PLOTTED BY: rhopkins SAVED BY: rhopkins  
I:\ACADdata\Projects\15\1569 2riv\1569-147-B01.dwg Layout1  
VPES: I:\GIS\Projects\15\1569 CAD\1569 Manitowoc Co\_Imagery\_2010\_v2.tif;  
VPES:



SOURCE NOTES:

1. COORDINATE REFERENCE SYSTEM IS NAD 1983  
MANITOWOC COUNTY COORDINATE SYSTEM, FEET;  
VERTICAL DATUM IS NAVD 1988 (US SURVEY FEET).
2. AERIAL PHOTOGRAPHY COURTESY ESRI.

	ISS AREA
	EXCAVATION AREA
	AIR MONITORING STATION LOCATION
	APPROXIMATE WPSC PROPERTY BOUNDARY



## AIR MONITORING STATION LOCATIONS

FORMER TWO RIVERS MANUFACTURED GAS PLANT  
WISCONSIN PUBLIC SERVICE CORPORATION  
TWO RIVERS, WISCONSIN

DRAWN BY:	RLH	DATE:	09/24/14
CHECKED BY:	MDW	DATE:	09/24/14
APPROVED BY:	KRM	DATE:	09/24/14
DRAWING NO:		15691-147-B01	
REFERENCE:		.	

PROJECT NO.

1569.1/14.7

FIGURE NO.

1

Table 1 - Analytical Air Summary

Weekly Progress Report  
Former Two Rivers MGP Site  
Two Rivers, WI

Sample Location	Sample Date	Sample Type	Benzo(a)anthracene (ug/m3)	Benzo(a)pyrene (ug/m3)	Benzo(b)fluoranthene (ug/m3)	Benzo(k)fluoranthene (ug/m3)	Chrysene (ug/m3)	Dibenz(a,h)anthracene (ug/m3)	Indeno(1,2,3-cd)pyrene (ug/m3)
Site-Specific Air SL (1E-04)			160	16	160	160	1600	15	160
Site-Specific Air SL (1E-05)			16	1.6	16	16	160	1.5	16
Site-Specific Air SL (1E-06)			1.6	0.16	1.6	1.6	16	0.15	1.6
FAM01	10/7/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0024	< 0.0018	< 0.0015
FAM02	10/7/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0025	< 0.0018	< 0.0015
FAM03	10/7/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0025	< 0.0018	< 0.0015
FAM04	10/7/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0025	< 0.0018	< 0.0015
FAM05	10/7/2014	PUF	< 0.0018	< 0.0023	< 0.0012	< 0.0027	< 0.0025	< 0.0018	< 0.0015
Field Blank	10/7/2014	PUF	< 0.0018	< 0.0023	< 0.0012	< 0.0027	< 0.0025	< 0.0018	< 0.0015
Average 9/9/14 - 10/7/14			0.0018	0.0022	0.0012	0.0027	0.0024	0.0018	0.0015

Sample Location	Sample Date	Sample Type	Benzene (ug/m3)	Ethylbenzene (ug/m3)	Naphthalene (ug/m3)	Toluene (ug/m3)	Xylene (total) (ug/m3)
Site-Specific Air SL (1E-04)			110	7100	42	7000	560
Site-Specific Air SL (1E-05)			110	710	42	7000	560
Site-Specific Air SL (1E-06)			23	71	5.2	7000	560
FAM01	10/7/2014	SUMMA	0.35	0.19	< 0.2	0.2	0.27
FAM02	10/7/2014	SUMMA	3.19	4.34	7.9	4.1	6.51
FAM03	10/7/2014	SUMMA	8.94	16.48	48.7	9	17.35
FAM04	10/7/2014	SUMMA	0.35	0.28	< 0.2	0.29	0.48
FAM05	10/7/2014	SUMMA	0.35	0.23	< 0.2	0.2	0.25
Field Blank	10/7/2014	SUMMA	< 0.09	< 0.09	< 0.16	< 0.09	< 0.18
FAM01	10/8/2014	SUMMA	0.26	0.38	0.9	0.8	0.98
FAM02	10/8/2014	SUMMA	2.16	3.16	3.8	2	3.11
FAM03	10/8/2014	SUMMA	24.2	48.89	4.7	18.1	40.44
FAM04	10/8/2014	SUMMA	2.19	3.69	4.6	1.74	3.73
FAM05	41920	SUMMA	0.27	0.23	< 0.2	0.30	0.25
Average 9/9/14 - 10/8/14			3.41	3.91	3.0	3.73	5.04

- Notes:
- 1) Site-Specific Air Sample Levels (SL) were developed by Exponent and were provided in the *Site-Specific Perimeter Air Monitoring Acceptable Air Concentrations Technical Memorandum* June 4, 2014. SLs are based on acceptable air concentrations for target cancer risks.
  - 2) Sample date listed is the start date of the 24-hour sampling period.
  - 3)   Parameter level was below the method detection limit.
  - 4) Averages do not include field blanks and duplicates.
  - 5) Results below the method detection limit are average with the method detection limit level.
  - 6) ug/m3 - micrograms per cubic meter adjusted to standard temperature and pressure.