



ENVIRONMENTAL CONSULTANTS

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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 13 through October 19, 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**

Integrys/Wisconsin Public Service Corporation Personnel on Site

- None

Geo-Solutions, Inc. Personnel on Site

- Keith Adamson
- Aaron Handel
- Eric Shannon
- Jason Greggs
- Rob Kautchick
- Dylan Ice
- Bob Lager
- Randall Tilly
- John Scott
- Amy Grass
- Tom Cook
- Clarence Wren

#### U.S. EPA Personnel on Site

- Brad Benning, **U.S. EPA**
- Fernando Monterey, **OTIE**

#### Subcontractors on Site

- Asbestos Removal, Inc. (ABI), **Asbestos Pipe Removal Contractor**
- Schroeder Environmental Cleaning Services, Inc. (SECSI), **U.S. Oil Pipeline Removal Contractor**

#### Others

- None

#### Visitors

- None

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 10/19/14: 3,543.49 Tons
- Debris Direct Disposal (Concrete and Wood) through 10/19/14: 1038.95 Tons
- Total Direct Disposal through 10/19/14: 4,582.44 Tons
- In-Situ Solidification/Stabilization (ISS) through 10/19/14: 11,337.92 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 preparation of an ISS work pad.
- Oversaw GSI's ISS drilling.
- Collected and prepared six ISS Construction Quality Assurance (CQA) samples (ISS-CL22-M, ISS-CL18-B, ISS-CJ16-M, ISS-CB2-T, ISS-CA3-M, and ISS-CE5-B).

- 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 (10/13).
- Oversaw GSI's erosion control inspections on Tuesday (10/14) and Wednesday (10/15), which were required due to the site receiving greater than 0.5 inches of rain on the previous days.
- Oversaw GSI's management of ponded water.
- Oversaw GSI's placement of sandbags along the ordinary high water mark.
- 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 ABI.
- Oversaw the removal of the abandoned U.S. Oil pipeline. The pipe was exposed by GSI and removed by SECSI.
- Issued truck manifests for disposal of 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 removal of peat material in the eastern portion of the ISS Area.
- Continued off-site trucking and disposal of peat material.
- Continued constructing an ISS work pad.
- Continued full-scale ISS drilling.
- Continued exposing abandoned gas lines wrapped with ACM for removal by ABI.
- Performed weekly erosion control inspection on Monday (10/13).
- Performed erosion control inspections on Tuesday (10/14) and Wednesday (10/15) due to the site receiving greater than 0.5 inches of rain on the previous days.
- Managed ponded water by pumping to constructed earthen berm containment areas and to a frac tank. Water pumped to the frac tank is intended to be used for ISS grout production.
- Placed sandbags along the ordinary high water mark.
- 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

- None.

#### Open/Outstanding Items

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

Work planned for the week of October 20 through October 26, 2014

- 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.



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 10-13-14 To 10-19-14.Docx]

### Field Photos:



**Photo 1:** U.S. Oil pipeline removal.

**Direction:** Facing west

**Photo Date:** 10/13/2014

**Photo Taken By:** ANS



**Photo 2:** Sand bags placed along the ordinary high water mark.

**Direction:** Facing south

**Photo Date:** 10/15/2014

**Photo Taken By:** DJV



**Photo 3:** Earthen berm constructed for on-site management of ponded water.

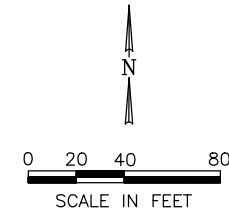
**Direction:** Facing northwest

**Photo Date:** 10/17/2014

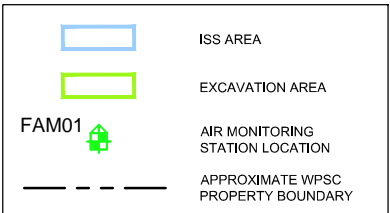
**Photo Taken By:** MDW



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.



## AIR MONITORING STATION LOCATIONS

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

PROJECT NO.  
1569.1/14.7

FIGURE NO.  
1

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:		.	

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	10/16/2014	PUF	< 0.0017	< 0.0022	< 0.0012	< 0.0026	< 0.0024	< 0.0018	< 0.0015
FAM02	10/16/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0024	< 0.0018	< 0.0015
FAM03	10/16/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0024	< 0.0018	< 0.0015
FAM04	10/16/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0024	< 0.0018	< 0.0015
FAM05	10/16/2014	PUF	< 0.0018	< 0.0022	< 0.0012	< 0.0027	< 0.0024	< 0.0018	< 0.0015
Average 9/9/14 - 10/16/14			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	10/16/2014	SUMMA	1.04	1.19	< 0.2	1.8	1.77
FAM02	10/16/2014	SUMMA	1.14	1.19	2.9	1.7	1.9
FAM03	10/16/2014	SUMMA	3.57	4.42	8	5.7	6.62
FAM04	10/16/2014	SUMMA	0.94	1.55	5.9	1.57	2.12
FAM05	10/16/2014	SUMMA	0.28	0.14	1.1	0.6	0.18
FAM01	10/17/2014	SUMMA	0.22	< 0.09	< 0.2	0.2	< 0.18
FAM02	10/17/2014	SUMMA	0.3	< 0.09	< 0.2	0.4	< 0.18
FAM03	10/17/2014	SUMMA	4.55	5.3	1.8	5.7	6.62
FAM04	10/17/2014	SUMMA	0.71	0.75	5.9	0.92	1.06
FAM05	10/17/2014	SUMMA	0.16	< 0.09	< 0.2	0.2	< 0.18
Average 9/9/14 - 10/17/14			3.18	3.64	2.9	3.52	4.71

- 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.