

March 13, 2015  
Revised April 21, 2015

Ed Olson  
MPCA  
520 Lafayette Avenue North  
St. Paul, MN 55115

**RE: George's Used Equipment  
2015 Supplemental Investigation/Removal Action Work Plan**  
UMore Park OU2 and OU3  
Rosemount, MN  
Bay West Proposal #J140651

Dear Mr. Olson:

Bay West LLC is pleased to submit this work plan (WP) for conducting a supplemental investigation and removal action at the George's Used Equipment Operable Unit (OU) 2 and OU3 in the University of Minnesota (U of M) UMore Park, in Rosemount, MN (the Site). This proposal presents the project approach, the scope of work, and a schedule for completing the work.

## 1.0 Introduction

The purpose of the proposed additional soil sampling is to delineate the extent and magnitude of PCB contamination in the vicinity of soil samples SS-51 and SS-52, which exhibited PCB concentrations exceeding 10 milligrams per kilogram (mg/kg) during previous excavation confirmation sampling conducted by Bay West in December 2014.

The U of M has requested that Bay West prepare this work plan to complete the delineation of PCBs in soil at the Site. Bay West is proposing 18 soil borings, based on analytical results for sidewall samples collected from a soil excavation recently completed at the Site by Bay West. Soil borings will be completed to a minimum of 2 feet below ground surface (bgs) with soil samples collected at intervals of 0-10" and 10-24" for laboratory analysis of PCBs. Information obtained during this supplemental investigation will be used to delineate the extent and magnitude of PCB contamination in soil and conduct a limited removal action, as described in Section 3.0.

## 2.0 Supplemental Investigation Scope of Work

Bay West is proposing the following scope of work:

- Amend the current Health and Safety Plan, as required by OSHA.
- Conduct a utility meet with public utility locators to verify if the proposed locations are acceptable.
- Complete 18 soil borings at the Site utilizing direct-push drilling technology. The samples will be analyzed as described below on a standard turn-around-time. In the event additional step-out sampling is required to further define the areal extent, samples

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will be collected from areas of concern and analyzed with 3 to 5 day turn around. This process will be repeated until the areal extent of soil with PCB concentrations greater than 1 mg/kg in the upper 10 inches and greater than 10 mg/kg in the 10"-24" interval has been defined.

- Soil borings will be advanced at the proposed locations shown on **Figure 1** to an approximate depth of 2 feet bgs.
- Record soil boring locations with a sub-meter global positioning system (GPS) unit.
- Characterize and document on soil boring logs the soil lithology in each soil boring in accordance with the Unified Soil Classification System (USCS). Indications of soil contamination (odors, staining, sheens, etc.) will be noted. Soil will be continuously head-space screened for organic vapors using a photo-ionization detector (PID) unit equipped with 10.6 eV lamp.
- Soil sample collection will be completed using soil sampling methods consistent with those described in the previously approved Sampling and Analysis Plan, Remedial Investigation, UMore East, Dakota County, Minnesota. If stained soil is present, the surface soil sampling method will include removing and placing aside the surface vegetation and rooting zone (if present). Each surface soil sample will be collected beneath the rooting zone. After the soil samples have been collected, the remaining soil and the vegetation and rooting zone soils (if present) will be replaced. All equipment used for surface soil sampling will be decontaminated using an Alconox wash and potable water rinse between each sample location.
- Two composite soil samples will be collected from each soil boring at 0 to 10" bgs and 10" to 24" bgs using a truck-mounted push-probe. Soil will be homogenized prior to sample containerization. Soils exhibiting visual staining or olfactory evidence of contamination will be sampled and analyzed as discrete samples. Soil samples from Tier 1 as shown in Figure 1 will be submitted for laboratory analysis of PCBs using EPA Method 8082A. Determination of whether some or all off the Tier 2 samples will be submitted for laboratory analysis will be made based upon the analytical results of the Tier 1 samples.
- None of the previous samples analyzed in the 2'-4' interval were greater than 0.6 mg/kg; therefore, no additional samples are proposed in the 2'-4' interval.
- Soil sample analysis will be completed as outlined in the Quality Assurance Project Plan approved by the MPCA on June 17, 2011.
- Collect one field duplicate and one field blank per 20 samples collected in accordance with the approved QAPP dated June 2011.
- Map soil sample locations and the proposed excavation extent using a sub-meter GPS.
- Following the collection of soil samples, each boring will be sealed in accordance with applicable well/boring codes and restored to resemble the surrounding grade.

Analytical results from the samples submitted for analysis as described above will be utilized to develop a removal plan and characterize and profile the soil at the disposal facility. A field report and the proposed final area of excavation will be submitted to the MPCA for final review.

### **3.0 Removal Activities**

Based on the analytical results presented in the field report Bay West recommends the following limited soil removal activities:

- Excavate soil that exceeds the cleanup criteria identified in the Record of Decision (ROD). Soils exceeding 1 mg/kg in the 0-10" interval and above 10 mg/kg in the 10"-24" interval based on the proposed soil boring analytical results will be removed. The excavated soil will be transported to SKB Landfill in Rosemount, MN for disposal. The excavation area will be surrounded with orange safety fence at the end of each work day and posted with a No Trespassing sign.
- Bottom and sidewall confirmation samples will not be collected, as the proposed excavation bottom and sidewalls will have been sufficiently characterized with the laboratory analytical data from the 0-2 foot interval.
- Excavate and containerize approximately one cubic yard of soil previously identified at SS-52 to a depth of 1' bgs. The soil will be managed as a bulk PCB waste under 40 CFR 761.61. The drums with the PCB remediation waste will be stored at the University of Minnesota's RCRA Part B facility located at 501 23<sup>rd</sup> Avenue SE, Minneapolis, MN, until they can be shipped to a permitted hazardous waste disposal facility under section 3004 of the RCRA regulations.
- Backfill the excavation area with clean fill material in 1-foot lifts upon receipt of confirmation analytical sample results.

### **4.0 Project Team**

Bay West's project team for providing the services described in this work plan are listed in the below table; other professional and support staff will be utilized as needed.

<b>Bay West Staff Member</b>	<b>Project Responsibilities</b>	<b>Billing Classification</b>
Bill Lazarz	Project Manager	Project Manager
Rick Van Allen, PG	Backup Project Manager	Project Manager
Donovan Hannu, PE	Technical Resource	Project Manager

Bay West's project manager, Mr. Lazarz, will oversee health and safety plan preparation, coordination of fieldwork activities, project data and report preparation, and project communication with the U of M.

### **5.0 Schedule**

Bay West anticipates that the environmental services described in the scope of work will be started immediately upon receipt of your written authorization to proceed. Soil sampling excavation and backfilling is scheduled to be completed within 30 days following approval of this work plan. The draft Additional Investigation Report will be submitted to the MPCA within thirty days following field work.

Thank you for the opportunity to submit this work plan. Bay West has been in the industrial and environmental contracting and consulting field for 40 years. We feel confident that our level of

expertise can provide the University of Minnesota with high quality, cost-effective, and professional environmental services for this project. If you have any additional questions or concerns, please contact Bill Lazarz using the contact information provided below.

Sincerely,



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Y:\Clients\UNIVERSITY\_OF\_MINNESOTA\Georges\_Used\_Equipment\140488\MapDocs\J140651 FIG 1 Proposed Soil Boring Location Map.mxd

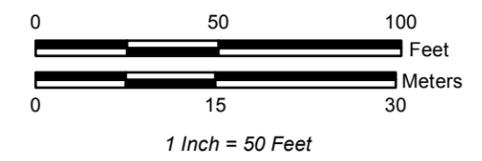


# Figure 1 Proposed Soil Boring Location Map

University of Minnesota -  
Facilities Management  
Minneapolis, MN



Map Projection: NAD 1983 UTM Zone 15 N  
Basemap: Microsoft Bing WMS



- Soil Boring Location - Proposed
- Soil Boring Location - December
- Soil Boring Location - Previous
- Excavation Extent
- 25' x 25' Sampling Grid
- Proposed Investigation Extent (Tier 1)
- Proposed Investigation Extent (Tier 2)

