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**Capital City Bike Path Excavation
Work Plan**

**Madison-Kipp Corporation
Madison, Wisconsin**

BRRTS No. 02-13-558625

Facility ID No. 113125320

August 2015



A handwritten signature in black ink, reading "Trena Seilheimer".

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**Capital City Bike Path
Excavation Work Plan**

Madison-Kipp Corporation
Madison, Wisconsin

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1. General

1.1 Introduction and Background

On behalf of Madison-Kipp Corporation (MKC), ARCADIS has prepared this work plan for a soil excavation within a landscaped area along the Capital City Bike Path (Site) located adjacent to the northern property boundary of the MKC facility at 201 Waubesa Street in Madison, Wisconsin. This Work Plan presents the plan for completing excavation and confirmation soil sampling activities along the Capital City Bike Path as discussed with the Wisconsin Department of Natural Resources (WDNR) and city of Madison. The work includes the excavation of polychlorinated biphenyl (PCB)-impacted soils between the Capital City Bike Path and MKC property to a depth of approximately 3 feet below ground surface (ft bgs), backfill activities, and reporting.

This Work Plan has been prepared and divided into the following five sections:

1. General
2. Objective
3. Schedule
4. Excavation & Sampling Plan
5. Reporting.

1.2 Site Location and Description

The Site is located within a landscaped area along the Capital City Bike Path adjacent to the north of 201 Waubesa Street in Madison, Wisconsin. The Site is located in the southwest quarter of Section 5, Township 7 North, Range 10 East in Dane County.

The Site is located in the eastern portion of Madison, in a mixed use area of commercial, industrial and residential land use. The Site is bounded by the Goodman Center to the north, MKC to the south, the city of Madison rain garden to the east, and Waubesa Street to the west. Residences are located adjacent to the east and west sides of the Site, and further west (across Waubesa Street) and east (across Marquette Street).



The Site is also located at the northeast end of the Madison isthmus, approximately 1,500 feet (ft) north of Lake Monona and approximately 6,800 ft east of Lake Mendota. The topography of the Site is relatively flat, with an elevation of approximately 860 ft above mean sea level. The surrounding area is serviced by municipal water supply and sewerage systems.

1.3 Project Contacts

The following contact information is provided for this project:

Facility Representative:	Alina Satkoski Madison-Kipp Corporation 201 Waubesa Street Madison, Wisconsin 53704 608-242-5200 (telephone) asatkoski@madison-kipp.com
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U.S. EPA Representative:	Kenneth Zolnierczyk United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604 312-353-9687 (telephone) Zolnierczyk.Kenneth@epamail.epa.gov



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1.4 Background

On June 1, 2015, city of Madison personnel collected soil samples from seven locations (HA-1 through HA-7) at an approximate depth of 1 ft bgs within the landscaped area between the Capital City Bike Path and MKC property (Figure 1). One soil sample was collected from each hand auger location and submitted to Pace Analytical Services, Inc. in Green Bay, Wisconsin for laboratory analysis of PCBs by United States Environmental Protection Agency (U.S. EPA) SW-846 Method 8082.



Based on the analytical results from the city of Madison sampling event, MKC collected additional soil samples from six locations in the vicinity of the HA-4 location (HA-4a through HA-4f) on June 30, 2015. Soil samples were collected at an approximate depth of 1 ft bgs at six locations and at an approximate depth of 2 to 2.5 ft bgs at one location (HA-4d) within the landscaped area between the Capital City Bike Path and MKC property (Figure 1). Soil samples were collected from each hand auger location and submitted to TestAmerica Laboratories, Inc. in University Park, Illinois for laboratory analysis of PCBs by U.S. EPA SW-846 Method 8082.

Results of the soil sampling activities completed by MKC indicated that six of the seven soil samples contained PCB concentrations above the WDNR's industrial direct contact residual contaminant level of 0.744 milligrams per kilogram (mg/kg). One sample also contained a PCB concentration above the U.S. EPA's Toxic Substance Control Act (TSCA) disposal limit of 50 mg/kg. Results of the hand auger soil samples are shown on Figure 1.



2. Objective

The Work Plan objective is to excavate the PCB-impacted soils within the landscaped area between the Capital City Bike Path and MKC property to a depth of approximately 3 ft bgs in the area of soil Samples HA-4f to HA-4c (Figure 2). Soils will be excavated to the extent practicable given utility constraints. Following the excavation activities, confirmation soil samples will be collected along the base and sidewalls of the excavation. The excavation will be backfilled with clean, imported backfill to grade.

Confirmation soil samples will be submitted for laboratory analysis of PCBs by U.S. EPA SW-846 Method 8082 (seven Aroclor analyses: Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260). Laboratory analytical results will be compared with the WDNR's industrial direct contact residual contaminant level of 0.744 mg/kg and the U.S. EPA's TSCA disposal limit of 50 mg/kg. As requested by WDNR, the confirmation soil samples will be collected approximately every 20 feet along the sidewalls and base of the excavation. Analytical results of the confirmation soil samples will be reviewed with WDNR.



3. Excavation and Confirmation Sampling Plan

The following sections present a description of the work to be completed. The contents of this section were prepared in accordance with NR 716.09 Wis. Admin. Code.

3.1 Health and Safety/Permitting

ARCADIS and/or MKC will call Digger's Hotline to locate and clear utilities within the excavation area limits, and coordinate with a private utility locator (Private Lines, Inc.). Utilities, including high-voltage electric line, two electric poles, high-capacity fiber-optic lines, and a natural gas line are located in the direct vicinity of the planned excavation. Precise and careful excavation techniques will be employed, to ensure the safety of the field team and accuracy of the excavation.

ARCADIS and/or MKC will coordinate with Madison Gas and Electric for oversight by Madison Gas and Electric personnel during excavation activities, if necessary, and requirements for setbacks in the area. The overhead electric lines may be covered with a sleeve to minimize the potential for arcing and serve as a more visible marking for the equipment. Additionally, ARCADIS will coordinate with the owners of the high-capacity fiber-optic line, running along the northwest edge of the excavation, for oversight by personnel during excavation activities, if necessary, and requirements for setbacks in the area.

Prior to implementing the recommended activities, ARCADIS and/or MKC will confirm if a revised city of Madison permit to excavate will be necessary to allow for excavation of soil and backfill of clean materials on city property.

Prior to beginning work each day, a "tailgate" health and safety briefing will be held to discuss the activities and identify ways to ensure the health and safety of Site workers. If conditions are encountered during Site investigation activities that differ from those outlined in the health and safety plan, the Site activities will be reevaluated to determine the appropriate actions that will ensure the health and well-being of the workers.



3.2 Excavation, Sampling & Backfill

PCB-impacted soils will be excavated from a landscaped area between the Capital City Bike Path and MKC property as shown on Figure 2. An approximate area of 540 square feet will be excavated to a depth of approximately 3 ft bgs in the area of soil Samples HA-4f to HA-4c. The soils will be loaded into staged roll-off boxes for transportation as TSCA waste to Environmental Quality's Wayne Disposal in Belleville, Michigan.

A total of 11 confirmation soil samples will be collected from the sidewalls and base of the excavation as shown on Figure 3. Samples will be collected approximately every 20 feet along the sidewalls and base as recommended by WDNR. Confirmation soil samples will be submitted to TestAmerica, Inc. (a state of Wisconsin certified laboratory) for laboratory analysis of PCBs by U.S. EPA SW-846 Method 8082 (seven Aroclor analyses: Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260). One duplicate soil sample, one matrix spike/matrix spike duplicate sample, and an equipment blank sample will also be collected and analyzed for PCBs by U.S. EPA SW-846 Method 8082 in accordance with the WDNR and U.S. EPA approved *Final Revised Work Plan for Polychlorinated Biphenyl Recommended Activities Subsurface Work Plan* dated December 2012 (ARCADIS, 2012).

Following the excavation and sampling activities, the excavated area will be backfilled to grade with clean backfill material.



4. Schedule

Following approval of this Work Plan by U.S. EPA and WDNR, it is planned that the activities will be initiated in fall 2015.



5. Reporting

Following receipt of the confirmation soil sample analytical results, ARCADIS will prepare a letter report. The letter report will include a summary of the activities completed and the analytical results, and provide recommendations if needed. Copies of the laboratory analytical reports will be included as attachments to the summary letter.

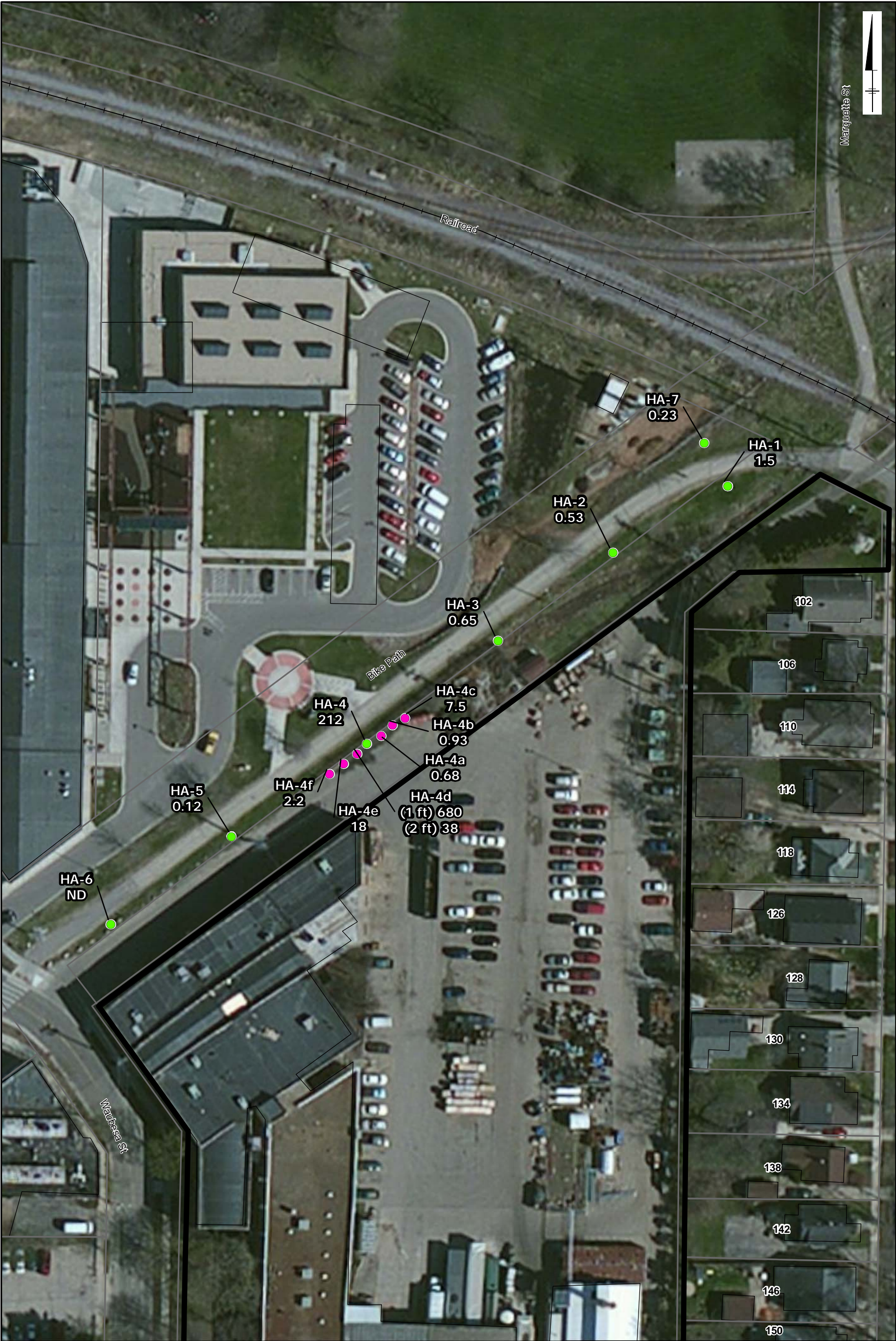


6. References

ARCADIS. 2012. Final Revised Work Plan for Polychlorinated Biphenyl Recommended Activities Subsurface Work Plan. December 2012.

Figures

CITY: MPLS DIV: GROUP: IM DB: MG LD: CK MADISON-KIPP
Z: GISPROJECTS\ENV\MadisonKipp\ArcMap2015-07\Fig1_Capital_City_Bike_Path_Soil_Investigation.mxd



LEGEND

- CITY OF MADISON HAND AUGER SOIL SAMPLE LOCATIONS
- MADISON-KIPP HAND AUGER SOIL SAMPLE LOCATIONS

PARCELS

BUILDING FOOTPRINTS

SITE

HA-1 LOCATION ID

1.5 TOTAL DETECTED PCBS IN MILLIGRAMS PER KILOGRAM (MG/KG)

ND PCBS NOT DETECTED

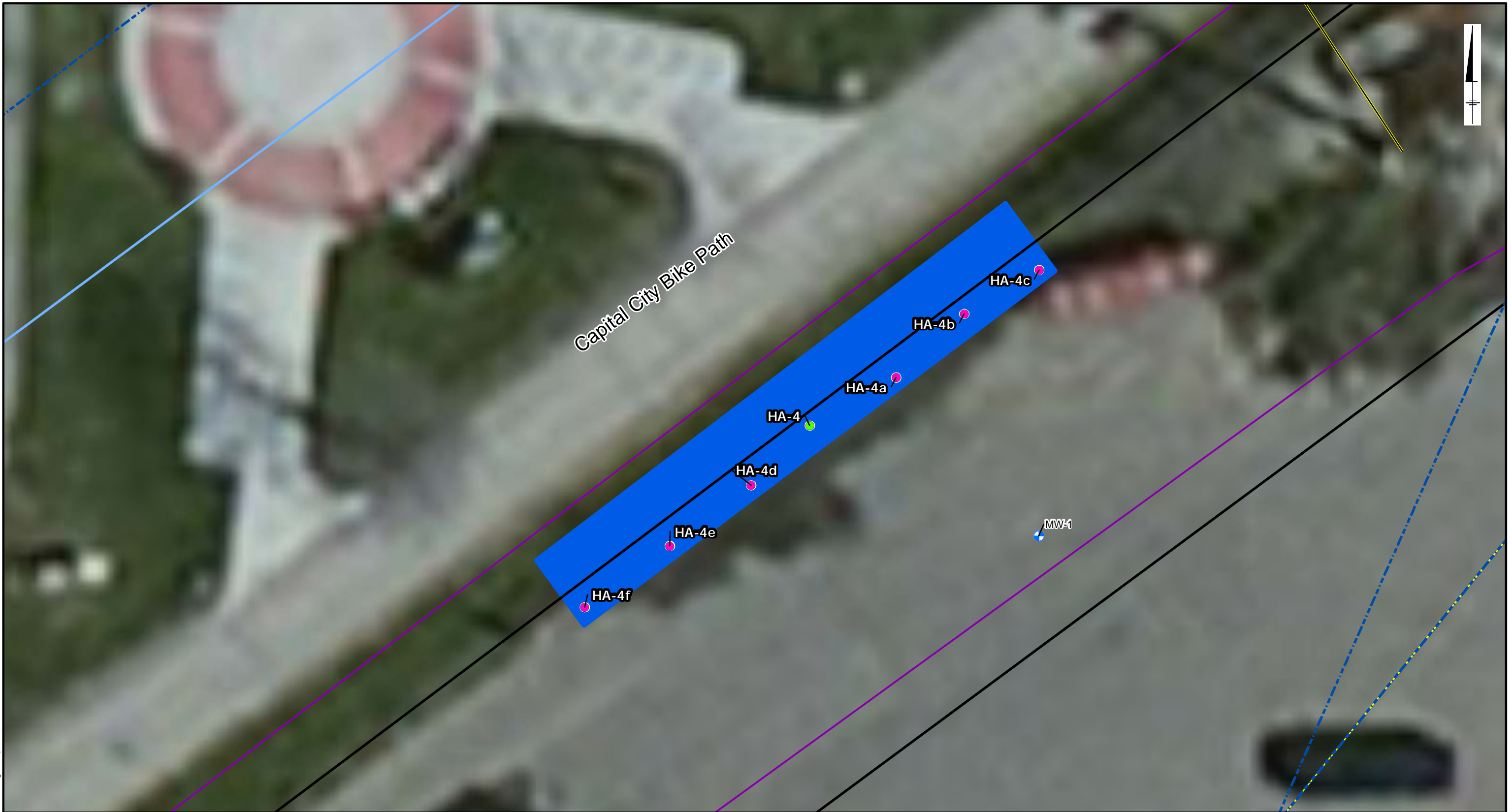
MADISON-KIPP CORPORATION
201 WAUBESA STREET
MADISON, WISCONSIN
WORK PLAN

CAPITAL CITY BIKE PATH SOIL
INVESTIGATION LOCATIONS



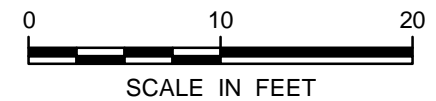
FIGURE
1

CITY: MKE DIV/GROUP: IM DB: MG LD: CK MADISON-KIPP
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LEGEND

- | | | | | | | | |
|--|---|--|---------------------------------|--|----------------|--|---|
| | CITY OF MADISON HAND AUGER SOIL LOCATIONS | | WATER MAIN | | ELECTRIC | | PROPOSED EXCAVATION AREA
TO 3 FEET BELOW GROUND SURFACE,
AND BACKFILL WITH CLEAN, IMPORTED SOIL |
| | HAND AUGER SOIL SAMPLE LOCATIONS | | ONSITE STORM
WATER DISCHARGE | | COMMUNICATIONS | | |
| | MONITORING WELL | | STORM WATER | | | | |



NOTE: FINAL EXCAVATION AREA TO BE APPROVED
WITH MADISON GAS & ELECTRIC
ALL LOCATIONS ARE APPROXIMATE

MADISON-KIPP CORPORATION
201 WAUBESA STREET
MADISON, WISCONSIN

PROPOSED CAPITAL CITY BIKE PATH
EXCAVATION AREA



FIGURE

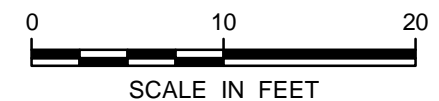
2

CITY: MKE DIV/GROUP: IM DB: MG LD: CK MADISON-KIPP
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LEGEND

- | | | | | | | | |
|--|---|--|------------------------------|--|----------------|--|---|
| | CITY OF MADISON HAND AUGER SOIL LOCATIONS | | WATER MAIN | | ELECTRIC | | LOCATION OF PROPOSED CONFIRMATION SOIL SAMPLE |
| | HAND AUGER SOIL SAMPLE LOCATIONS | | ONSITE STORM WATER DISCHARGE | | COMMUNICATIONS | | PROPOSED EXCAVATION AREA TO 3 FEET BELOW GROUND SURFACE, AND BACKFILL WITH CLEAN, IMPORTED SOIL |
| | MONITORING WELL | | STORM WATER | | | | |



NOTE: FINAL EXCAVATION AREA TO BE APPROVED WITH MADISON GAS & ELECTRIC
ALL LOCATIONS ARE APPROXIMATE

MADISON-KIPP CORPORATION
201 WAUBESA STREET
MADISON, WISCONSIN

PROPOSED CAPITAL CITY BIKE PATH EXCAVATION AREA CONFIRMATION SAMPLES



FIGURE

3