



December 19, 2008

Ms. Denise Boone
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590

**RE: Milwaukee Solvay Coke and Gas Site RI/FS Administrative Settlement Agreement and Order (V-W-07-C-861)
Limited Asbestos Removal Report**

Dear Ms. Boone:

On behalf of the Milwaukee Solvay Coke and Gas Site RI/FS Group, we are submitting a copy of the limited asbestos removal report and photo documentation of the activities. In response to the recommendation in the Agency for Toxic Substances and Disease Registry (ATSDR) and the Wisconsin Division of Public Health (WDPH) letter dated April 25, 2008, friable asbestos located near Pile 18 (Sampling location A-25) and other observed friable asbestos materials were removed prior to the commencement of the Remedial Investigation activities.

Besides the friable asbestos pipe insulation reference above, two other areas of suspect asbestos containing materials (ACM) were observed and removed for offsite disposal. A process unit containing fibrous insulation material near sampling location A-15 (east of the former coke ovens) and an electrical panel containing fibrous insulation material (located south of the car ferry area) were also addressed during the removal activities. The insulation from the process unit and the electrical panel were not tested for asbestos, but instead were assumed to be ACM and disposed of appropriately. The attached photo log shows before and after pictures of each area.

Burns & McDonnell contracted Balestrieri to conduct the removal action and properly dispose of the ACM removed from the site. The activities outlined in this report were conducted on September 10 and 11, 2008 prior to mobilization for the remedial investigation. Both the friable asbestos piping insulation and the electrical panel insulation were removed by hand and double bagged prior to offsite transport for disposal. The insulation from the process unit was too difficult to remove completely, therefore it was decided that the entire unit would be bagged and transported offsite for disposal. The ACM and the process unit removed from the site were transported to the Metro Recycling and Disposal facility located at 10712 South 124th Street in Franklin, WI for disposal.

It should be noted that the removal report attached is a generic report used for any site. No asbestos removal was conducted within any of the structures at the site. The report includes the daily reports, notification form submitted to the Wisconsin Department, air monitoring results and manifests for the disposal of the ACM offsite.



Ms. Denise Boone
United States Environmental Protection Agency
Page 2

Please do not hesitate to contact Teresa Jordan or me should you have any questions related to this submittal.

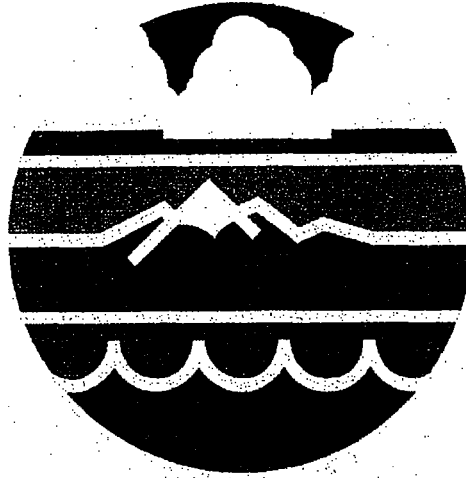
Sincerely,

A handwritten signature in black ink, appearing to read "Jeffery L. Pope", written over the word "Sincerely,".

Jeffery L. Pope, PE
Burns & McDonnell Engineering Co., Inc.
Manager – Environmental and Remediation Services

Enclosures: Balestrieri Limited Asbestos Removal Report
Photo Documentation of Asbestos Removal Activities

cc: M. Brunette, WDNR - 2 copies Fed Ex
Teresa Jordan, TERSCO Environmental Consulting – 1 copy
e-copy from Project Coordinator-
Milwaukee Solvay Coke & Gas Site RI/FS Group Steering Committee and Technical Committee



Balestrieri

AN INDUSTRIAL SERVICE COMPANY

Response Action Summary

Asbestos Abatement - Prior to Renovation

Performed: September 10, 2008 Through September 11, 2008

Milwaukee Solvay Coke & Gas - Debris Cleanup (3 Areas)

311 East Greenfield Avenue

Milwaukee, WI 53204

Contact: Mr. Jason Blazier

PREPARED FOR:

Burns & McDonnell

1431 Opus Place Suite 400

Downers Grove, IL 60515-1164

**Contract: Contract
dtd 09-08-08**

Contact: Mr. Jason Blazier

PO Box 860, Elkhorn, Wisconsin 53121-0860

www.balestrierigroup.com

(262) 743-2800 • (262) 743-2810 (fax)

Toll Free (800) 453-2965

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*Chicago
Illinois*

*Rockford
Illinois*

Contents

Page

General Information 3

Description of RAS/Typical Floor Plan 4

Emergency Contacts..... 6

Air Sampling Information..... 7

Signatures of Responsible Parties 8

Appendixes 9

Contractor Information Section 1

Permits Section 2

Foreman Reports/Daily Logs Section 3

Sample Analysis Results..... Section 4

Waste Manifest Forms..... Section 5

General Information

Preface

The purpose of this Response Action Summary record-keeping log is to document the abatement activities conducted within the building or structure named in this report and the location of the response actions.

The content and organization of this document follows the checklist utilized by the State of Wisconsin Division of Health and Family Services for reviewing a response action conducted in school buildings after December 14, 1987. This format also meets the Environmental Protection Agency's (EPA) National Emissions Standard for Hazardous Pollutants (NESHAP) 40 CFR Part 61 Standards and all subsequent revisions.

Project Information

Property Owner (if known):	East Greenfield Investors LLC PO Box 22 Lemont, IL 60439 Contact: Mr. Jason Blazier
Owner Representative/GC	Burns & McDonnell 1431 Opus Place Suite 400 Downers Grove, IL 60515-1164 Contact: Mr. Jason Blazier
Project Planner:	Kenneth R. Balestrieri Balestrieri PO Box 860 Elkhorn WI 53121-0860
Location of Response Action:	Milwaukee Solvay Coke & Gas Location: Debris Cleanup (3 Areas) 311 East Greenfield Avenue Milwaukee, WI 53204
Date of Construction:	Approx. & Square Feet
Scope of Work:	Labor, materials, equipment, hauling and disposal, subcontractor fees, air monitoring services and permits (when applicable) to remove and properly dispose of asbestos containing building materials from the above referenced location.
Date Started:	September 10, 2008
Date Completed:	September 11, 2008

Description of Response Action and Methods Used

All abatement activities shall conform to current OSHA and EPA (AHERA where applicable) regulations. Procedures to be followed include those described in 40 CFR Part 763, the Owner's specifications, and the Balestrieri Contractor Guidelines for Asbestos Abatement (available upon request). In the event of a conflict between the above-mentioned procedures and regulations, the more stringent shall apply. The following information provides clarification of the procedures utilized throughout the duration of the project.

Procedures

Initial Cleaning

Horizontal surfaces and other areas where asbestos debris may be located in work areas containing damaged friable asbestos are wet wiped and/or HEPA vacuumed prior to initiation of Response Actions by Balestrieri in order to prevent the spread of salient asbestos fibers.

Air Monitoring

Per OSHA guidelines, during removal operations, a minimum of 25% of the workforce are wearing personal air monitoring devices to monitor the air in which they are working in. Area monitoring is performed to demonstrate that air quality is acceptable and meets OSHA standards.

Respiratory Protection

The minimum respiratory protection used by all technicians in the working area(s) consists of a personal air-purifying half-mask respirator throughout the duration of the project. HEPA filters are used to ensure worker safety. Masks are cleaned prior to every filter change.

Contaminated Waste Disposal Method

Asbestos containing material and/or contaminated waste are double-bagged in the area where abatement activities take place. Depending upon the size of the project, these bags are stored on location in 6-mil poly lined dumpsters until transported when full – or at the end of the project – to a certified landfill. Balestrieri may transport small quantities of double-bagged ACBM to a certified landfill using fully enclosed 6-mil poly lined vehicles.

Please refer to Waste Manifest in Appendix - Section 5 of this document.

A Typical Floor Plan

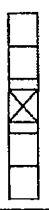
The following floor plan demonstrates the layout of a typical abatement project, indicating the placement of critical barriers and HEPA filtration to achieve negative air pressure containment for abatement procedures. Work areas are posted to limit access while abatement procedures are performed.

Work Area:
 Critical Barrier with
 Negative-Air Pressure

Key:
 [Symbol] Asbestos containing
 material in a regulated area.

Posted Area

5-Stage Decon
 Suite



Make Up Air



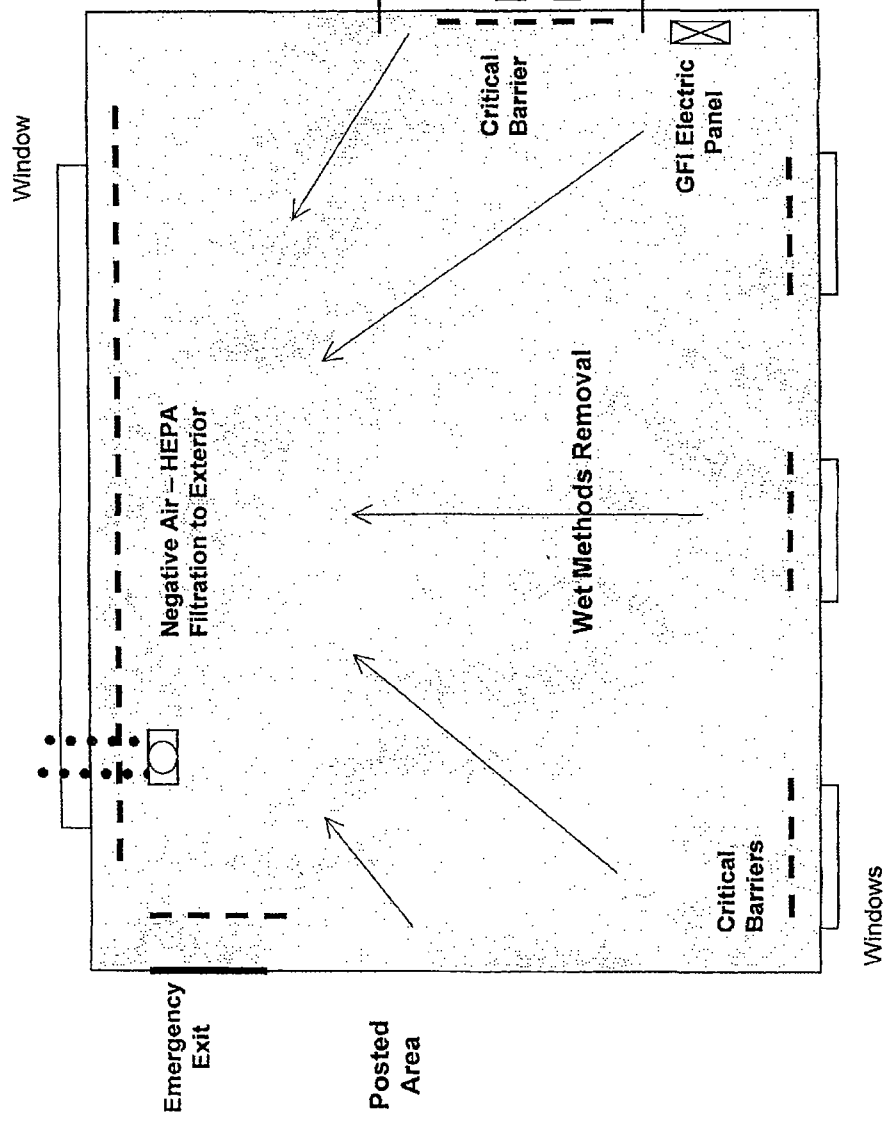
Bag Out

Owner/General Contractor:
 Responsible to isolate the following:

- HVAC
- Electric Service

Engineering Controls to omit visible emissions:

- Negative Air Pressure Containment
- Wet Methods



PO Box 880, Elkhorn, WI 53121-0880
 Phone (262) 743-2800 - Fax (262) 743-2810

**ABATEMENT PROCEDURES FOR A
 TYPICAL FLOOR PLAN**

Emergency Contacts

Owner and/or Owner Representatives

East Greenfield Investors LLC

PO Box 22, Lemont, IL 60439

Contact: Mr. Jason Blazier (630) 724-3278

Burns & McDonnel

1431 Opus Place Suite 400, Downers Grove, IL 60515-1164

Contact: Mr. Jason Blazier (630) 724-3278

Building

Milwaukee Solvay Coke & Gas

Debris Cleanup (3 Areas)

311 East Greenfield Avenue, Milwaukee, WI 53204

Contact: Mr. Jason Blazier (630) 724-3278

Abatement Contractor

Balestrieri

PO Box 860, Elkhorn WI 53121

Designated Person: Kenneth R. Balestrieri..... Office (262) 743-2800

..... Cell (262) 215-9563

Air Monitoring Analysis

Micro Analytical, Inc.

15521 W. North Avenue, Milwaukee, WI 53226

Mr. Jon Yakish..... (414) 771-0855

Waste Transport/Disposal

Waste Management – Metro Landfill

10712 S. 124th Street, Franklin, WI 53132

Special Waste Division..... (800) 963-4776

Emergency Numbers

Fire Department/Paramedic..... 911

Police..... 911

Local Hospital..... 911

Poison Control Center 911

Air Sampling Information

Bulk Sampling and Analysis for Asbestos Content

Additional bulk sampling may have been taken during the course of the project to determine the presence of asbestos within a suspect building material before abatement activity. The results of these samples are found in Section 4 of this document.

Locations of Air Sample Analysis

Please refer to the General Information area of this report for clarification of base-line, personnel, area monitoring and clearance sampling to be performed within the building abated. The number and location of clearance samples beyond that specified under current OSHA and EPA regulations shall be at the discretion of the on-site superintendent, professional air monitoring firm and/or credited industrial hygienist firm.

Personnel Sampling

As stated earlier, at least twenty-five percent (25%) of the work force on the project will undergo personnel air monitoring at all times during removal and clean-up procedures. An additional field blank or 10% will be included as specified in OSHA 1926, Appendix.

Explanation of Terms

Action Level – 0.100 F/CC - Level set by OSHA for personnel protection, calibrated on an eight (8) hour time weighted average (TWA). Respiratory protection and appropriate actions, such as engineering controls, barrier erection, and notifications, must be taken when area samples indicate this fiber level.

Excursion Limit (EL) – 1.000 F/CC - Level set by OSHA which describes the maximum fiber exposure an employee may experience at a specific time during gross removal without respiratory protection. Excursion limit samples run for thirty (30) minutes.

Permissible Exposure Limit (PEL) – 0.100 F/CC - Level set by OSHA for personnel protection and is calibrated on an eight (8) hour time weighted average (TWA). PEL describes the maximum average fiber exposure an employee may experience during the entire work shift with no respiratory protection. This average can be described using a TWA, which is the average of all the personnel sample results collected on an individual during the work shift.


Time Weighted Average (TWA) - Term used by OSHA to describe the average fiber exposure that an employee may experience during the entire work shift. Times listed next to the TWA symbol indicate the total sampling time used in calculating the TWA.

Field Blank - Unused cassette that is analyzed to check fiber count quality. Results are not reported unless they are problematic.

Names and Signatures of Responsible Parties

Abatement Contractor

I have reviewed the information contained in this Response Action Summary Project Design, and agree, to the best of my knowledge, that all information is accurate and complete.

Project Planner:  _____ Date: October 2, 2008

Other Parties Involved:

Signature _____ Date _____
Owner/Title: _____

Signature _____ Date _____
Owner/Rep/Title: _____

Signature _____ Date _____
Gen. Contractor/Title: _____

Signature _____ Date _____
Consultant/Title: _____

Signature _____ Date _____
Other/Title: _____

Signature _____ Date _____
Other/Title: _____

Appendixes

Contractor Information. 1

When available, reports provided by subcontractors, consultants or independent air monitoring firms would be included within this report. Feel free to contact us for their credentials if required.

Permits 2

All applicable notices filed will be included in this document. A ten-day notice of intent is not required for small scale short duration **renovation or single isolated residential demolition** projects that involve less than 260 linear feet, 160 square feet, or 35 cubic feet, and/or non-friable materials, per NESHAP regulations dated 11/20/90, 40 CFR 61.140, 61.145(A)(A).

Foreman Reports/Daily Logs..... 3

Along with the daily log of project activity and technicians assigned to your project, you may also find documentation of Visitor Notifications.

Sample Analysis Results 4

Sampling data including the information listed in the General Information area of this report will be appended to this project as it becomes available.

Waste Manifests 5

Due to the nature of some projects, this area may not contain manifests.

APPENDIX 1

Contractor Information

Asbestos Abatement Contractor

Balestrieri

PO Box 860, Elkhorn, Wisconsin 53121-0860 (262) 743-2800

Accreditation: State of Wisconsin – Department of Health & Family Services

..... State of Illinois – Department of Public Health

..... State of Michigan – Department of Consumer & Industry Services

..... State of Minnesota – Department of Health

Names and Accreditation Numbers:

All license numbers are posted on site. Photocopies are available during the duration of this project should you require them.

<u>NAME</u>	<u>DISCIPLINE</u>	<u>WISCONSIN</u>	<u>ILLINOIS</u>	<u>MICHIGAN</u>
Balestrieri, Kenneth	Contractor		500-00407	
	Project Designer	APD-453		
	Supervisor/Worker	ACS-453	100-01337	A14855
	Inspector	AII-453	100-01337	
	Mgmt Planner	AMP-453	100-01337	
	Air Monitor Prof.	ACS-453		
	Lead Certification	DHFS-11080		
	Lead Supervisor	LCS-453		
Balestrieri, Anthony	Project Designer	APD-633		
	Supervisor	ACS-633		
Agushi, Nazim	Supervisor/Worker	ACS-4837	100-09651	A30941
	Lead Worker	LAW-4837		
Anderson, Curt	Supervisor/Worker	ACS-102786	100-10325	A30938
	Inspector	AII-102786		
Andrade, Samuel	Supervisor/Worker	ACS-106957	100-11029	
Baltierrez, Jose	Supervisor/Worker	ACS-4487	100-10440	
	Lead Worker	LAW-4487		
Bautista, Alfredo	Supervisor/Worker	ACS-108147	100-10656	
	Lead Worker	LAW-108147		
Bisoso, Marcelino	Supervisor/Worker	ACS-11694	100-10048	
	Lead Worker	LAW-11694		
Carrera, Bernabe	Supervisor/Worker	ACS-17044	100-11027	
Carrera, Roman	Supervisor/Worker	ACS-16826	100-11026	
Hardesty, Todd	Supervisor/Worker	ACS-105125	100-10138	
Jandrowski, Stephen	Project Designer	APD-195		
	Mgmt Planner	AMP-195		
	Inspector	AII-195	100-09652	
	Supervisor/Worker	ACS-195	100-09652	A30939
	Lead Supervisor	LCS-195		

APPENDIX 1

Contractor Information

NAME	DISCIPLINE	WISCONSIN	ILLINOIS	MICHIGAN
Ladarom, Seumsack	Inspector	AII-2081	100-05404	
	Supervisor/Worker	ACS-2081	100-05404	A14857
	Lead Supervisor	LCS-2081		
Marcello, James	Inspector	AII-13210	100-08890	
	Supervisor/Worker	ACS-13210	100-08890	
	Lead Supervisor	LCS-13210		
Martinez, Pablo	Supervisor/Worker	ACS-102451	100-10710	
Ramirez, Jose	Supervisor/Worker	ACS-106720	057304490	
Rodriquez, Alvaro	Supervisor/Worker	ACS-107191	100-10712	
	Lead Worker	LAW-107191		
	Supervisor/Worker	ACS-119551		A37327
Ruenz, Michael	Supervisor/Worker	ACS-15847	100-10093	
	Lead Worker	LAW-15847		
Venegas, Antonio	Inspector	AII-14513	100-08854	
	Supervisor/Worker	ACS-14513	100-08854	A21378
	Lead Worker	LAW-14513		

Notification of Demolition and/or Renovation and Application for Permit Exemption

Form 4500-113 Rev 06-05

Notice: Completion of this form is mandatory under ch. NR 406.04, 410.05 and 447.07, Wis. Adm. Code. Penalties for failure to provide complete information requested include forfeitures of \$10 to \$25,000, fines of up to \$25,000 and imprisonment for up to six months. This form may be used to meet the notification requirements for the Department of Health and Family Services, Wis. Adm. Code 159. Personally identifiable information provided may be matched with other private, state, and federal agencies. Submit Form: Return completed form to the appropriate office(s) listed on page 2. The DNR does not accept FAXed copies of original or revised notifications.

SHADED AREAS ON THIS FORM ARE FOR DNR USE ONLY.

1. Contractor Project #: 4268 01	2. Postmark:	3. Date Received:	4. DNR File #:		
5. Type of Notification: <input type="checkbox"/> Original <input type="checkbox"/> Revised <input type="checkbox"/> Cancellation <input type="checkbox"/> Emergency: Date/Hr Notified: ____/____/____:____ <input checked="" type="checkbox"/> Other (Explain): <u>2 Day DHFS Courtesy DNR</u>		6. Type of Project: <input checked="" type="checkbox"/> Renovation/Abatement <input type="checkbox"/> Emergency Renovation/Abatement <input type="checkbox"/> Planned Renovation/Abatement (Annual) <input type="checkbox"/> Demolition <input type="checkbox"/> Ordered Demolition <input type="checkbox"/> Fire Training Burn Asbestos Present? (Circle one): <u>Yes</u> No			
7. Date (MM/DD/YY) of DNR Required Pre-Project Asbestos Inspection: Start: <u>Owner Tested / Assumed</u> End: <u>Owner Tested / Assumed</u>		8. Inspector Certification Information: Name: <u>Owner Tested / Assumed</u> WI Inspector #: <u>N/A</u>			
9. Dates (MM/DD/YY) of Asbestos Abatement: Start: <u>09-10-08</u> End: <u>09-24-08</u> Work Shift(s): <u>1 2 3</u> Weekend: <u>NOT EXPECTED</u>		10. Dates (MM/DD/YY) of Renovation/Demolition: Start: <u>09-11-08</u> End: <u>12-31-08</u> Work Shift(s): <u>1 2 3</u> Weekend: <u>POSSIBLE</u>			
11. Abatement Contractor Name: <u>BALESTRIERI ENVIRONMENTAL & DEVELOPMENT, INC.</u> Address: <u>P.O. BOX 860</u> City, St, Zip: <u>ELKHORN, WI 53121-0860</u> Contact Person: <u>KENNETH R. BALESTRIERI</u> Telephone #: <u>(262) 743-2800</u>		12. Demolition Contractor Name: <u>X</u> Address: <u>X</u> City, St, Zip: <u>X</u> Contact Person: <u>X</u> Telephone #: <u>X</u>			
13. Facility Information: Name: <u>MILWAUKEE SOLVAY COKE & GAS</u> <u>DEBRIS CLEANUP</u> Address: <u>311 EAST GREENFIELD AVENUE</u> City, St, Zip: <u>MILWAUKEE, WI 53204</u> Contact Person: <u>MR. JASON BLAZIER</u> Telephone #: <u>(630) 724-3278</u> Prior Use: <u>COMMERCIAL</u> Present Use: <u>COMMERCIAL</u> Age (Yrs): <u>APPROX. 50 YEARS</u> Size (Sq.Ft.): <u>APPROX. 40 Acres</u> Number of Floors: <u>N/A</u> Number of Apartment Units: <u>N/A</u> County: <u>MILWAUKEE</u> DNR Region: <u>SOUTHEAST</u> Number of structures to be demolished: <u>NONE</u>		14. Facility Owner Name: <u>EAST GREENFIELD INVESTORS LLC</u> Address: <u>PO BOX 22</u> City, St, Zip: <u>LEMONT, IL 60439</u> Contact Person: <u>MR. JASON BLAZIER</u> Telephone #: <u>(630) 724-3278</u>			
		15. Waste Disposal Site/Transporter Name: <u>WASTE MANAGEMENT OF WISCONSIN - METRO RECYCLING</u> Address: <u>10712 S 124TH STREET</u> <u>(WM OF WI ALSO TRANSPORTER)</u> City, St, Zip: <u>FRANKLIN, WI 53132</u> Contact Person: <u>ANTHONY JONES</u> Telephone #: <u>(414) 529-6180</u> DNR License Number: <u>WDNR 01099</u>			
16. Amount of Asbestos, including: A. Regulated Friable ACM to be removed. B. Category I & II ACM TO BE removed. C. Category I & II ACM NOT removed.		Friable Asbestos/RACM TO BE removed	Nonfriable Asbestos Material TO BE removed	Nonfriable Asbestos Material NOT removed before demolition	
		CAT I	CAT II	CAT I	CAT II
Pipes (Linear Feet)	10	-----	-----	-----	-----
Surface Area (Square Feet)	124 ^{sq}	-----	-----	-----	-----
Volume Friable ACM off facility component (Cubic Feet)	-----	-----	-----	-----	-----
17. Asbestos Abatement/Demolition Fees - Check or money order must be submitted with notification to DNR Asbestos Coordinator					
Project Type	Quantities to be Abated * Refer to Box 6 and Box 16 to determine fee submittal amount * Make checks payable to WI Dept. of Natural Resources	Check Amount Due	Amount Rec'd By DNR		
Demolition	Less than 160 square and 260 linear feet of friable or nonfriable ACM	<input type="checkbox"/> \$75	X		
Reno/Demo	At least 160 sq. or 260 ln. ft. friable asbestos/RACM but less than 1000 combined feet	<input type="checkbox"/> \$225	X		
Reno/Demo	Combined square & linear feet friable asbestos/RACM quantities greater than 1000 feet but less than 5000 feet	<input type="checkbox"/> \$400	X		
Reno/Demo	Combined square & linear feet friable asbestos/RACM quantities of at least 5000 feet	<input type="checkbox"/> \$750	X		

18. Indicate the inspection procedure, including analytical methods, used to detect the presence or absence of the ACM
PLM ANALYSIS OF BULK SAMPLES USED TO DETECT THE PRESENCE OF THE ASBESTOS CONTAINING BUILDING MATERIAL.

19. Description of the asbestos material involved and its location in the facility to be demolished/renovated:
PROPER REMOVAL AND DISPOSAL OF ASBESTOS CONTAINING THERMAL INSULATION, FITTINGS/JOINTS, AND THERMAL PIPE INSULATION, IN/ON DEBRIS CLEANUP, PRIOR TO RENOVATION.

20. Description of renovation/abatement and/or demolition work, including specific abatement/demolition method(s) to be used:
SIX-MIL POLY LABELED BAGS OR POLY WRAPPED AND LABELED MATERIALS, CONTAIN AREA, NEGATIVE-AIR PRESSURE, WET METHODS, HAND REMOVAL, GROSS REMOVAL AND GLOVE BAG OPERATIONS WHERE APPLICABLE; HEPA VAC; DECON SUITE, ETC.

21. Description of abatement work practices/engineering controls and waste handling procedures, specific to this site, used in preventing ACM emissions:
SIX-MIL POLY LABELED BAGS OR POLY WRAPPED AND LABELED MATERIALS, CONTAIN AREA, NEGATIVE-AIR PRESSURE, WET METHODS, HAND REMOVAL, GROSS REMOVAL AND GLOVE BAG OPERATIONS WHERE APPLICABLE; HEPA VAC; DECON SUITE, ETC.

22. Description of procedures to be followed if asbestos not previously identified is found or previously nonfriable asbestos becomes crumbled, pulverized or reduced to a powder:
STOP WORK, CHANGE SCOPE OF WORK, CONTAIN AREA, WET METHODS, HEPA VAC, ETC.

23. If an emergency abatement, complete the following information (attach additional sheets if necessary):
 Date and Hour of Emergency: Date (MM/DD/YY): ____/____/____ Time (12Hr Clock): ____:____ a.m. p.m.
 Description of sudden, unexpected event: _____

 Explanation of how event caused unsafe condition, potential equipment damage or an unreasonable financial burden: _____

24. If an ordered demolition, identify the government agency issuing the order: (Attach a copy of the order.)
 Name: _____ Title: _____
 Authority: _____
 Date of Order (MM/DD/YY): ____/____/____ Date Order to begin (MM/DD/YY): ____/____/____

25. I certify that an individual trained in the provisions of this regulation (40 CFR Part 61, Subpart M) will be on-site during the demolition/renovation and evidence that the required training has been accomplished by this person will be available for inspection during normal business hours.
 Signature: HTWZ Title: PRESIDENT Date (MM/DD/YY): 09 / 08 / 08

26. I certify that the above submitted information is correct to the best of my knowledge:
 Signature: HTWZ Title: PRESIDENT Date (MM/DD/YY): 09 / 08 / 08

27. Indicate which of the following agencies/offices were sent their mandatory copy of the demolition/renovation notification. DNR has been delegated notification authority - USEPA no longer requires a copy of the notification. Note: Dry asbestos removal requests must be pre-approved by DNR, prior to required notification.

- | | | |
|--|----------|--|
| <input checked="" type="checkbox"/> Department of Natural Resources
Asbestos Coordinator, AM/7
Bureau of Air Management
P.O. Box 7921
Madison, WI 53707-7921 | Courtesy | <input checked="" type="checkbox"/> Department of Health & Family Services
Division of Public Health
Asbestos/Lead (Pb) Section
P.O. Box 2659
Madison, WI 53701-2659 |
|--|----------|--|

Copy Southeast Region if work will be conducted within Kenosha, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington, or Waukesha Counties:
 DNR - Southeast Region
 2300 N Dr M L King Jr Dr
 Milwaukee, WI 53212
 Phone: (414) 263-8500
 Courtesy



Balestrieri

PO Box 860, ELKHORN, WI 53121-0860
PHONE (262) 743-2800 - FAX (262) 743-2810

DAILY LOG

Date: September 10, 2008

Day of Week: Wednesday

Job Name: Milwaukee Solvay Coke & Gas Job # 4268 - 01

Superintendent's Name: Todd Hardesty 1025

1. Discuss scope of job with crew. Comments: <u>Site Safety</u>
2. Did all visitors sign in/out log? <u>Mark Davis (DNR)</u>
3. Identify on-site GC's PM &/or Supervisor: <u>Mr. Jason Blazier/Burns + McDonnell</u>
4. Were all barriers and penetration seals inspected? <u>yes</u> Warning signs posted? <u>yes</u>
5. Shower/Decon unit set-up/operational? <input type="checkbox"/> Full <input type="checkbox"/> Remote
6. Was all equipment inspected? <input type="checkbox"/> Neg. Air <input type="checkbox"/> Decon unit <input type="checkbox"/> Water Filtration <input type="checkbox"/> HEPA vacs <input type="checkbox"/> Other
7. Following posted/on-site: <input checked="" type="checkbox"/> 1st Aid Kit <input checked="" type="checkbox"/> Fire Extinguisher <input checked="" type="checkbox"/> Regulations <input checked="" type="checkbox"/> Emergency Phone List
8. Negative Air primary and/or secondary filters changed? _____ How Many? _____
9. Was OSHA personnel/area monitoring conducted? <u>Yes</u> / Lab: <u>Moire</u> Posted? _____
10. Waste hauled by? <input type="checkbox"/> WM <input type="checkbox"/> SUP <input type="checkbox"/> BE&D <input type="checkbox"/> Owner # of Dumpsters: _____ Size of Dumpster? _____
11. Disposal site? _____ Manifest Completed: <input checked="" type="checkbox"/> None

Describe below the pertinent details and progress of today's activities:

Location in Building: _____

Description of Work: 2 hrs MOP Meeting in morning. Safety meeting in morning. Wrapped and bagged heavy blowo-like machine to get ready for transport on trucks.

Job Completed? No Yes

Manometer Reading: N/A Morning: _____ "wc Noon: _____ "wc Evening: _____ "wc

Freezing Conditions Record: Morning: _____ °F Noon: _____ °F Evening: _____ °F

Record of On-Site Meeting:

Safety topics and anticipated problems discussed:

- | | | | | | |
|---------------------------------------|-------------------------------------|-----------------|--------------------------|-------------------|-------------------------------------|
| Ladder/Scaffold/Harness Safety | <input type="checkbox"/> | Electrical GFI | <input type="checkbox"/> | Vehicle Safety | <input checked="" type="checkbox"/> |
| Hard Hat/Safety Glasses/Ear Plugs | <input checked="" type="checkbox"/> | Hot Permit | <input type="checkbox"/> | Hand Tools | <input checked="" type="checkbox"/> |
| Slip and Fall Hazards | <input checked="" type="checkbox"/> | Fall Protection | <input type="checkbox"/> | Emerg. Resp Proc. | <input checked="" type="checkbox"/> |
| Respirator/Protective Equipment/PEL's | <input checked="" type="checkbox"/> | Confined Space | <input type="checkbox"/> | Other: _____ | <input type="checkbox"/> |

Site specific equipment? Yes No Type/Condition: _____

Safety Orientation Complete? Yes No Comments: _____

Did you observe any potential job site hazards? Yes No GC/Owner Notified: Yes No
If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

Did a work-related injury or illness occur on the jobsite? Yes No Comments: _____
If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

Did an incident occur which required First Aid Treatment? Yes No Comments: _____
If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

In Attendance (record daily):

Technician Name	Clock #	Technician Name	Clock #
<u>Veneas, Carlos</u>			
<u>Miramonter, Fidel</u>	<u>1020</u>		



Balestrieri

PO Box 860, ELKHORN, WI 53121-0860
 PHONE (262) 743-2800 - FAX (262) 743-2810

DAILY LOG

Date: September 11, 2008

Day of Week: Thursday

Job Name: Milwaukee Solvay Coke & Gas Job # 4268 - 01

Superintendent's Name: Todd Hardesty 1025

1. Discuss scope of job with crew. Comments: <u>Site Seteb</u>
2. Did all visitors sign in/out log? <u>None</u>
3. Identify on-site GC's PM &/or Supervisor: <u>Mr. Jason Plezner / Burns & McDonnell</u>
4. Were all barriers and penetration seals inspected? <u>Yes</u> Warning signs posted? <u>Yes</u>
5. Shower/Decon unit set-up/operational? <u>✓</u> <input type="checkbox"/> Full <input checked="" type="checkbox"/> Remote
6. Was all equipment inspected? <input type="checkbox"/> Neg. Air <input type="checkbox"/> Decon unit <input type="checkbox"/> Water Filtration <input checked="" type="checkbox"/> HEPA vacs <input type="checkbox"/> Other
7. Following posted/on-site: <input checked="" type="checkbox"/> 1st Aid Kit <input checked="" type="checkbox"/> Fire Extinguisher <input checked="" type="checkbox"/> Regulations <input checked="" type="checkbox"/> Emergency Phone List
8. Negative Air primary and/or secondary filters changed? <u>-</u> How Many? <u>'</u>
9. Was OSHA personnel/area monitoring conducted? <u>Yes</u> <u>1</u> Lab: <u>None</u> Posted? <u></u>
10. Waste hauled by? <input type="checkbox"/> WM <input type="checkbox"/> SUP <input checked="" type="checkbox"/> BE&D <input type="checkbox"/> Owner # of Dumpsters: <u></u> Size of Dumpster? <u></u>
11. Disposal site? <u>Metre # 891508</u> Manifest Completed: <u>Yes</u> <input type="checkbox"/> None

Describe below the pertinent details and progress of today's activities:

Location in Building:
 Description of Work: Proper removal and disposal of asbestos containing materials. Wet Methods, HEPA Vac. Clean up areas with asbestos debris.

Job Completed? No Yes
 Manometer Reading: N/A Morning: "wc Noon: "wc Evening: "wc
 Freezing Conditions Record: Morning: °F Noon: °F Evening: °F

Record of On-Site Meeting:

Safety topics and anticipated problems discussed:

Ladder/Scaffold/Harness Safety	<input checked="" type="checkbox"/>	Electrical GFI	<input checked="" type="checkbox"/>	Vehicle Safety	<input checked="" type="checkbox"/>
Hard Hat/Safety Glasses/Ear Plugs	<input checked="" type="checkbox"/>	Hot Permit	<input type="checkbox"/>	Hand Tools	<input type="checkbox"/>
Slip and Fall Hazards	<input checked="" type="checkbox"/>	Fall Protection	<input type="checkbox"/>	Emerg. Resp Proc.	<input checked="" type="checkbox"/>
Respirator/Protective Equipment/PEL's	<input checked="" type="checkbox"/>	Confined Space	<input type="checkbox"/>	Other:	<input type="checkbox"/>

Site specific equipment? Yes No Type/Condition: Forklift-good / Generator-good
 Safety Orientation Complete? Yes No Comments:

Did you observe any potential job site hazards? Yes No GC/Owner Notified: Yes No
 If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

Did a work-related injury or illness occur on the jobsite? Yes No Comments:
 If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

Did an incident occur which required First Aid Treatment? Yes No Comments:
 If so, please contact Balestrieri Safety Manager at (262) 743-2800 immediately.

In Attendance (record daily):

Technician Name	Clock #	Technician Name	Clock #
<u>Venegas, Carlos</u>	<u></u>	<u></u>	<u></u>
<u>Munamotes, F. del</u>	<u>1020</u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>

MICRO ANALYTICAL, INC.
11521 West North Avenue
Milwaukee, WI 53226
(800)771-9820 (414)771-0855
Fax: (414)771-6570

PCM FIBER COUNT REPORT


Balestrieri Env & Dev Inc.
PO Box 860
Elkhorn WI 53121-860

Job ID: 4268-01 - Milwaukee Solvay

Report # 95932

Sampled By: Todd Hardesty

Date Received: 09/23/08

Analyst: Aaron Engelman 

Date Analyzed: 09/25/08

<u>Sample ID</u>	<u>Fibers/CC</u>	<u>F/100 Flds</u>	<u>Comments</u>			
9/10P	<0.029 12:30 13:30	3.5	Lpm	2.00	Ltrs	120.0
9/11P	0.021 07:30 10:30	15.5	Lpm	2.00	Ltrs	360.0

LOD (Limit of Detection) policy of MicroAnalytical, Inc. is 8.92F/mm2 or 7fbrs/100flds designated with a "<" sign.

AIHA 101057



PO Box 860, ELKHORN, WI 53121-0860
 PHONE (262) 743-2800 - FAX (262) 743-2810

EFFECTIVE 07/23/07

AIR SAMPLING LOG

Date: Sept. 10, 2008
 Day of Week: Wednesds

Job Name: Milwaukee Solvay Coke & Gas Job # 4268 - 01
 Location of Pump: PEL Pump Worn by: Cecilia Vanevor
 Conducted by: Todd Hordosky SSN: _____

Type of Respirator:

- ½ Mask, Negative Pressure
- Powered Air Purifying Respirator
- Supplied Air Respirator

Type of Pump:

- Personnel
- High Volume

Type of Sample:

- Personnel
- Background (before work starts)
- Ambient (area during removal)
- Negative Air Exhaust
- Clearance (at completion)
- Decontamination Suite
- Excursion
- Other: _____

Type of Work:

- Glove Bag
- Tenting
- Containment
- Set-up
- Clean-up
- Bag-out
- Trailer Vac
- Encapsulant
- Other: _____

Test Cassette (1):

Test Cassette #: 4268-9/10P
 Flow Rate: Lit/Min: 2.0
 Start Time: 12:30 p.m.
 Stop Time: 1:30 p.m.

Test Cassette (2):

Test Cassette #: _____
 Flow Rate: Lit/Min: _____
 Start Time: _____
 Stop Time: _____

Field Blank(s):

1. _____ 2. _____

Receiving Analyst's Name	Receiving Analyst's Firm	Supervisor's/Superintendent's Name	Abatement Firm
		<u>Todd Hordosky</u>	Balestrieri
Receiving Analyst's Signature	Date Samples Received	Supervisor's/Superintendent's Signature	Date Sampled
		<u>Todd Hordosky</u>	<u>9/10/08</u>



Balestrieri

PO Box 860, ELKHORN, WI 53121-0860
PHONE (262) 743-2600 - FAX (262) 743-2810

EFFECTIVE 07/23/07

AIR SAMPLING LOG

Date: September 11, 2008
Day of Week: Thursday

Job Name: Milwaukee Solvay Coke & Gas Job # 4268 - 01
Location of Pump: PEL Pump Worn by: Carlos Venegas
Conducted by: Todd Hardesty SSN: _____

Type of Respirator:

- 1/2 Mask, Negative Pressure
- Powered Air Purifying Respirator
- Supplied Air Respirator

Type of Pump:

- Personnel
- High Volume

Type of Sample:

- Personnel
- Background (before work starts)
- Ambient (area during removal)
- Negative Air Exhaust
- Clearance (at completion)
- Decontamination Suite
- Excursion
- Other: _____

Type of Work:

- Glove Bag
- Tenting
- Containment
- Set-up
- Clean-up
- Bag-out
- Trailer Vac
- Encapsulant
- Other: _____

Test Cassette (1):

Test Cassette #: 4268-9/11P
Flow Rate: Lit/Min: 2.0
Start Time: 7:30 AM
Stop Time: 10:30 AM

Test Cassette (2):

Test Cassette #: _____
Flow Rate: Lit/Min: _____
Start Time: _____
Stop Time: _____

Field Blank(s):

1. _____
2. _____

Receiving Analyst's Name	Receiving Analyst's Firm	Supervisor's/Superintendent's Name	Abatement Firm
		<u>Todd Hardesty</u>	Balestrieri
Receiving Analyst's Signature	Date Samples Received	Supervisor's/Superintendent's Signature	Date Sampled
		<u>Todd Hardesty</u>	<u>9/11/08</u>

Job # 4268-01

WASTE SHIPMENT RECORD/ASBESTOS MANIFEST

(See Reverse for Instructions)

For Disposal Site Use Only

Elevation _____

North _____ East _____

1-A. Special Waste Profile Number
ASB28126

NESHAP Notified
____ YES ✓ NO

WSR Number
891508

1-B. Generator Name, Contact Name, and Complete Mailing Address (including Zip Code)
**East Green Field Investors LLC
PO Box 22
Lemont IL 60439 Mr. Jason Blazier**

1-C. Generator's Phone Number
630-724-3278

1-D. Work Site Address
**Milwaukee Solway Coke and Gas
311 East Greenfield Ave
Milwaukee WI 53204**

1-E. 24 Hour Emergency Response Telephone Number
(800) 453-2965

2. Operator's Name and Complete Mailing Address
**Balestrieri Environmental & Development, Inc.
P.O. Box 860, Elkhorn, WI 53121-0860**

Operator's Phone Number
(800) 453-2965

3. Waste Disposal Site (WDS) Name and Complete Mailing Address
**Metro Recycling and Disposal Facility
10712 South 124th Street; Franklin, WI 53132**

WDS Phone Number
(414) 529-6180

4. Name and Address of Responsible Agency
 Illinois Environmental Protection Agency
220 Churchill Road, Springfield, IL 62794-9276
 DNR-Bureau of Air Management
PO Box 7921, Madison, WI 53707-7921
 DNR-Southeast Region
PO Box 12436, Milwaukee, WI 53212

5. Description of Materials
Thermal Insulation, Pipe/Fitting Insulation, Tar paper

6. Containers No. Type
13 BA

7. Total Quantity yd3
4 yd3

Asbestos, 9, NA2212, III, RQ
non-friable asbestos
Cat I _____ Cat II _____

8. Special Handling Instructions and Additional Information
24 HOUR NOTICE GIVEN PRIOR TO DISPOSAL, MUST BE BURIED

9. GENERATOR/OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. I hereby certify that the asbestos is not contaminated with hazardous, PCB, and/or any special waste.

Printed/Typed Name and Title
Todd Hardsy, Supervisor

Signature
Todd Hardsy

Date
9/11/08

10. Transporter 1 Company Name
**Balestrieri Environmental & Development, Inc.
P.O. Box 860
Elkhorn, WI 53121-0860
(800) 453-2965
DOT Transport #12968**

Driver Signature
Fidel Miramontes
Printed Name and Title
Fidel Miramontes
Date
Sept. 11, 2008

11. Transporter 2 Company Name

Driver Signature

Complete Mailing Address

Printed Name and Title

Telephone Number (including area code)

/Driver

Date

12. Discrepancy Indication Space

13. Waste Disposal Site Owner or Operator
Special Waste Approval is issued by signature in the case of a Generic Asbestos Approval.
Certification of receipt of asbestos materials covered by this manifest except as noted in Item 12.

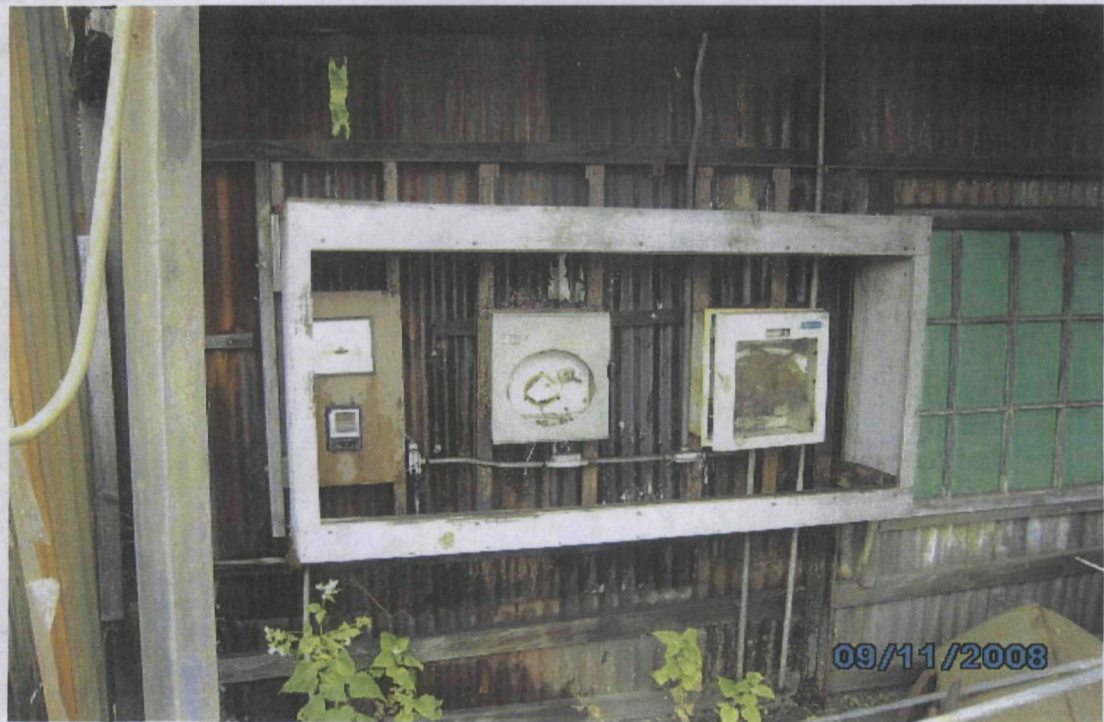
Printed/Typed Name and Title
M. Stimal/Sales

Signature
M. Stimal

Date
9/11/08



Subject	Electrical Panel with Suspect ACM Prior to Removal		1
Site	Milwaukee Solvay Coke & Gas Site		Date
Client	Milwaukee Solvay RI/FS Group		9/10/2008



Subject	Electrical Panel following Removal of Suspect ACM		2
Site	Milwaukee Solvay Coke & Gas Site		Date
Client	Milwaukee Solvay RI/FS Group		9/11/2008



Subject	Bagging of Entire Process Unit Containing Suspect ACM		5
Site	Milwaukee Solvay Coke & Gas Site		Date
Client	Milwaukee Solvay RI/FS Group		9/11/2008



Subject	Loading of Bagged Process Unit for Transportation to Disposal Facility		6
Site	Milwaukee Solvay Coke & Gas Site		Date
Client	Milwaukee Solvay RI/FS Group		9/11/2008



April 29, 2008

Ms. Denise Boone
U.S. Environmental Protection Agency
77 West Jackson Blvd., SR-6J
Chicago, IL 60604

Subject: Health concerns related to asbestos in stockpiled demolition debris from the former Solvay Coke facility, 311 Greenfield Ave., Milwaukee.

Dear Ms. Boone:

Following the demolition of Solvay Coke buildings during 2003 and 2004, building debris was stockpiled at locations throughout the site. Although the original demolition plans included provisions to properly remove and dispose of asbestos-containing material (ACM; defined as > 1% asbestos), it has since been observed that some of the debris piles include some ACM. *Natural Resource Technology, Inc.* later assessed the property for the presence of asbestos in demolition stockpiles and soil (NRT 2007).¹

In light of the presence of ACM on the Solvay site, the U.S. EPA requested that Wisconsin Division of Public Health (DPH) provide an independent evaluation of health concerns posed by the asbestos contamination reported by NRT (2007). Since December 2001, DPH prepared a previous health consultation for this property (ATSDR 2003),² has made numerous site visits, and has been involved in responding to health-related issues concerning the property.

The previous health consultation (ATSDR 2003) briefly addressed the asbestos issue by identifying possible hazards from ACM during future remediation:

Dispersal of asbestos pipe insulation during building demolition. The EPA *Site Assessment Report* (2) included sampling and inventory for asbestos containing materials (ACMs) in and around the buildings. The sampling and inventory focused on 2,745 feet of outdoor pipe insulation. The *Site Assessment Report* acknowledges that the sampling was preliminary and did not include asbestos-containing building materials

¹ NRT. 2007. Asbestos Survey: Former Milwaukee Solvay Coke & Gas Company Site, 311 East Greenfield Avenue. Milwaukee, Wisconsin. *Natural Resource Technology, Proj. 1886, Nov. 2, 2007.*

² ATSDR. 2003. Health Consultation, Solvay Coke Brownfield, Milwaukee, Milwaukee County, Wisconsin. Agency for Toxic Substances and Disease Registry. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service. Internet: http://www.atsdr.cdc.gov/hac/PHA/solvaycoke/sol_p1.html

other than the pipe wrap. It is not known whether non-inventoried ACMs are sufficiently friable to pose an environmental health threat to site workers. The removal of friable ACMS will require proper mitigation procedures to avoid environmental dispersion and direct exposure to workers during demolition.

Most of the ACM was apparently disposed of off-site during the demolition phase of the remediation. However, the NRT 2007 study identified ACM remaining in demolition debris on-site, including Transite fragments (ranging from *ca.* 2-30 cm. in diameter), asbestos-resin adhered to brick, asphalt roofing material, and concrete board. Asbestos was also detected in many soil samples throughout the site.

Potential exposure population. Based on prior knowledge of site conditions and current information from DNR field staff, we know that the site is relatively remote, with the nearest residential neighborhoods being about 650 feet west of the property, across and industrial area, highway 32, and the Chicago and Northwestern Railroad corridor. These obstacles, along with a somewhat deteriorated chain link fence around the property, are barriers to casual visitation. However, there are people, both authorized and unauthorized, who come into closer contact with the site. These include at least one homeless person occupying an unused building adjacent to the site, trespassers on the property (evidenced by extensive painted graffiti on-site), people working offsite but adjacent to the property, and anyone entering the site for occupational reasons. The possibility of exposure to each of these groups was evaluated with regard to the following *potential exposure pathways to ACM:*

- Inhalation of asbestos fibers resulting from offsite dispersion from demolition stockpiles containing ACM
- Inhalation of asbestos fibers by on-site workers that are handling ACM; potential secondary inhalation exposure to family members from clothing contaminated with ACM dust
- Inhalation of asbestos fibers by on-site trespassers handling ACM; potential secondary inhalation exposure to family members from clothing contaminated with ACM dust.
- Inhalation of asbestos fibers-contaminated soil on- or off-site.

Environmental concentrations used as comparison values

ACM. Standards for the various definitions of asbestos-containing material and the handling of those materials are presented under The Wisconsin Administrative Code, *ch.* NR 447.02 (WAC 2004).³ In general, ACM would contain at least 1% asbestos as determined by polarized light microscopy (PLM) and would be classified as friable or non-friable. Therefore, the 1% asbestos criterion is a regulatory definition that corresponds to the detection limit for the PLM analytical method. It is used to make

³ WAC. 2004. Control of Asbestos Emissions. Wisconsin Administrative Code, Ch. 447. Internet: <http://www.legis.state.wi.us/rsb/code/nr/nr447.pdf>

decisions regarding the disposition of asbestos-containing waste materials. It is not a health risk-based concentration that determines whether a material could pose a health hazard resulting from possible exposure.

Ambient Air. EPA and ATSDR have not published health-based standards and guidelines for asbestos in air, but the ATSDR *Toxicological Profile for Asbestos* includes a summary (ATSDR 2001, Table 6-4)⁴ of typical general and occupational exposures. Clearance levels and action levels for *indoor* air were developed by EPA for the World Trade Center Response (EPA 2004),⁵ but are not cited here as the exposure and risk scenario for outdoor air differs from indoors. In addition, risk-based screening criteria for other sites that EPA and ATSDR have investigated have been developed for residential exposure situations. However, the conditions at Solvay do not represent either of these exposure situations. Occupational exposure during ACM removal is a legitimate exposure scenario at the former Solvay facility. NIOSH (2005)⁶ recommends that occupational exposures be reduced to the lowest feasible concentration, and recommends a relative exposure limit of 0.1 fiber/cc, as determined by NIOSH Method 7400.

Soil. Health-based standards and guidelines for safe asbestos concentrations in residential soil have not been established. DPH acknowledges, as does EPA in their 2003 report,⁷ that it is difficult to predict concentrations of asbestos in air resulting from soil contamination due to the variety of factors affecting the dispersion of soil dust. Any remedial actions will need to address appropriate clean-up criteria based on anticipated future land use

DPH site visit

DPH toured the site on April 4, 2008, along with Mark Davis, WDNR asbestos expert, and Rachel Schneider representing the RP group. Each of the ACM areas identified by NRT (2007) was inspected, as well as the gravel vehicle pathways and areas outside of the abandoned buildings. In agreement with NRT 2007, we found small (*ca.* 2-15cm diameter) pieces of ACM scattered intermittently at the locations indicated in NRT 2007, as well as on the gravel roadways. The ACM found consisted primarily of wavy Transite and tarpaper roofing material. We also found a few < 20cm lengths of possible asbestos-

⁴ ATSDR. 2001. Toxicological profile for asbestos. Agency for Toxic Substances and Disease Registry . Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

⁵ EPA. 2004. *Charge for the WTC Peer Consultant, Memo from RP Nolan to Kate Schalk*. U.S. Environmental Protection Agency. Internet: <http://www.epa.gov/WTC/panel/pdfs/nolan.pdf>

⁶ NIOSH. 2005. Appendix C in *Pocket Guide to Chemical Hazards*. National Institute for Occupational Safety and Health. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention. Pub. No. 2005-149.

⁷ EPA. 2003. Libby asbestos site, residential/commercial cleanup, action level and clearance criteria: Technical memorandum (Draft Final- Dec. 15, 2003). U.S. Environmental Protection Agency, Region 8.

containing rope gasket. Representative samples of ACM were placed in plastic bags and field-tested for friability. The Transite pieces did not disintegrate under hand pressure, and there was no apparent dust generated when abraded within the plastic bag. However, in comparing various Transite fragments, some had sharp edges indicating recent breakage while others had rounded edges indicating weathering and corresponding asbestos dispersal. In contrast, the roofing material was relatively easy to tear, but due to the resin content there was no apparent generation of dust within the plastic bag. Some roofing pieces had fibrous edges when torn, suggesting the potential for asbestos dispersal if weathered. One location, A25 (NRT 2007), contained demolished metal pipe with some visibly friable pipe wrap. Some of the demolition brick, particularly near the standing smoke stack, has a black resin coating identified by NRT as ACM. This coating is not apparently friable, but it is not clear whether there is a potential for the creation of asbestos dust should this brick be broken when handled by heavy machinery.

Evaluation of exposure pathways

Off site dispersion and inhalation of ACM dust from demolition stockpiles. The limited amount of ACM observed around demolition debris piles does not appear to be particularly friable, but is nonetheless exposed to weathering and wind dispersion. There is significant uncertainty in attempting to estimate asbestos exposure levels for individuals who may come into contact with this ACM. However, this uncertainty does not negate the obligation to properly dispose of ACM under national emissions standards for hazardous air pollutants (NESHAPS) rules. Removal of the source ACM from the Solvay property would certainly eliminate any potential hazard.

Dispersion to air by on-site workers handling ACM, followed by direct inhalation or secondary inhalation to ACM dust on clothing. Exposure to airborne asbestos is predictably higher to those actively handling ACM in demolition debris than under conditions of passively weathered ACM. There is not enough current information to quantify this exposure. DPH agrees, with *Proposed Changes to the RI/FS (RETEC 2007)*⁸ which would include provisions for worker safety to those handling ACM that would prevent both direct inhalation of asbestos and secondary inhalation of dust from contaminated clothing.

Dispersion to air by on-site trespassers handling ACM, followed by direct inhalation or secondary inhalation of ACM dust on clothing. Trespassers handling ACM on-site would face exposure scenarios similar to workers, although conditions would likely be less dusty. That exposure would likely be of a much shorter duration; however these individuals would not have respiratory or clothing protection that workers would be required to wear.

⁸ RETEC. 2007. Milwaukee Solvay Coke and Gas Site: Proposed changes to RI/FS planning documents based on asbestos survey. Dec. 19, 2007 letter from Schmitz and Blumer of The RETEC Group to Denise Boone, U.S. EPA.

Inhalation of asbestos-contaminated soil on- or off-site. Soil samples from most of areas B and C (NRT 2007) indicate the hazard from inhalation of trace asbestos in soil in those sections of the property is likely to be minimal. In section A, chrysotile was qualitatively reported in 20 of 48 soil samples. Quantitative composite samples were not reported from this area of the property, and it is not clear whether asbestos is present in these soils at levels of health concern.

Conclusions

The evaluation of the various components of the former Solvay property with regard to asbestos contamination can be categorized in any of three ways. A specific location may have asbestos contamination insufficient to be a public health concern, a location may require ACM removal to prevent an ongoing concern to the public or workers on-site, or a location with ACM or asbestos soil contamination may be managed in-place.

- The data indicate all of the composite surface soil samples in areas B and C are below the CARB 435 detection limit of 0.25% asbestos. However, there is uncertainty about the asbestos content of soils beneath demolition debris piles within those areas.
- Most of the visible ACM building debris around demolition piles is unlikely to result in asbestos exposure due to low friability. However, any physical disturbance of the debris piles that would possibly crush or fragment the ACM could result in the release of asbestos fibers. The soils beneath or adjacent to the asbestos-containing debris piles should be assumed to be contaminated unless proven otherwise with actual sampling data.
- Based on observed site conditions, the most likely potential exposures will be to on-site workers handling ACM and those exposed to dust in building demolition piles.

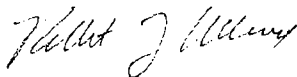
Recommendations

- Friable ACM at location A25 (NRT 2007), and any other friable ACM that may be found on-site, should be removed in the short term to limit its dispersion on-site and potentially off-site.
- Future removal of building demolition piles should include the removal of surface soil underlying and surrounding those piles to the extent needed to remove visible ACM building debris and prevent possible asbestos dispersion. These soils will require either further analysis to quantitatively verify asbestos content, or preventive removal.

- Future work to remove building demolition piles should include a site safety plan to include provisions for worker safety to those handling ACM and to prevent breathing demolition dust.
- Future site activities should be conducted using dust control techniques on demolition piles with identified ACM, and on unimproved vehicle pathways containing ACM, in order to avoid possible dispersal of asbestos fibers.
- The disposal of demolition piles that include ACM is regulated by state and federal laws. Following these laws will help prevent the dispersal of ACM in demolition debris.

ATSDR and DHFS are available to provide technical assistance and to respond to health concerns from residents or local officials. Mark Johnson can be contacted at 312/353-3436, MDJohnson@cdc.gov; Rob Thiboldeaux is available at 608/267-6844, robert.thiboldeaux@wi.gov.

Sincerely,



Robert Thiboldeaux, Ph.D., Toxicologist
Wisconsin Division of Public Health



Mark Johnson, Ph.D, DABT,
Assistant Director for Science,
ATSDR Region 5

CC: Mark Davis, WDNR
Amy Walder, WDNR
Margaret Brunette, WDNR
Barb Draybuck, American Natural Resources Company
David B. Crouch, Cliffs Mining Company
Rita Dolan, East Greenfield Investors, LLC
Teresa Jordan, Maxus Energy Corporation
Mark Collins, We Energies
Rachel A. Schneider, Quarles & Brady, LLP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

July 29, 2008

Teresa C. Jordan, Project Coordinator
Milwaukee Solvay Coke and Gas Site RI/FS Group
c/o TERSCO Environmental Consulting
10265 Woodbury Road
Laingsburg, Michigan 48848

**SUBJECT: Partial Approval of the Remedial Investigation/Feasibility Study
Quality Assurance Project Plan (First Revision) for the Milwaukee
Solvay Coke and Gas Site in Milwaukee, Wisconsin**

Dear Ms. Jordan:

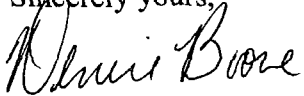
The United States Environmental Protection Agency (U.S. EPA) is providing a partial approval of the first revision of the Remedial Investigation/Feasibility Study Quality Assurance Project Plan (QAPP) for the Milwaukee Solvay Coke and Gas Site in Milwaukee, Wisconsin. All activities are approved except for those associated with the forensic polyaromatic hydrocarbons (PAHs) analysis of sediment.

In order to obtain a full approval, the following outstanding issues must be addressed in the final QAPP:

1. Test America Knoxville did not provide SOP KNOX-MS-0020, Rev 0, analysis of the forensic PAHs, because the standard operating procedure (SOP) contains proprietary information. Whether proprietary or not, U.S. EPA has to review and approve the SOP. Therefore, we are willing to work with Test America Knoxville to maintain the SOP as Confidential Business Information.
2. Provide Test America Knoxville's preparation SOP KNOX-OP-0011, soxhlet extraction of sediments for PAHs.
3. Include a signature line for Test America Knoxville on Worksheet #1 – Title and Approval Page.

If you have any questions concerning this letter, please feel free to contact me at (312) 886-6217 or e-mail me at boone.denise@epa.gov.

Sincerely yours,

A handwritten signature in cursive script that reads "Denise Boone".

Denise Boone
Remedial Project Manager

Enclosure

cc: Margaret M. Brunette, WDNR

QAPP Worksheet #1
Title and Approval Page

Quality Assurance Project Plan, Milwaukee Solvay Coke & Gas Site, Milwaukee, Wisconsin
Document Title

Milwaukee Solvay Coke & Gas Site RI/FS Group (RI/FS Group)
Lead Organization

Sue Milcan, ENSR
Preparer's Name and Organizational Affiliation

1601 Prospect Parkway, Fort Collins, CO 80525; (970) 493-8878; smilcan@ensr.aecom.com
Preparer's Address, Phone Number, and e-mail Address:

August 30, 2007; May 30, 2008 – revision 1; July 29, 2008 – revision 2
Preparation Date (Day/Month/Year)

Investigative Organization's Project Manager:
Jeffery L. Pope, PE – Burns & McDonnell Signature/Date:

Investigative Organization's Project QA Manager:
Sharon Shelton – Burns & McDonnell Signature/Date:

Lead Organization's Project Manager:
Teresa Jordan (TERSCO Environmental Consulting),
Project Coordinator
RI/FS Group 2007 Signature/Date:

Primary Approval:
Denise Boone, Remedial Project Manager
U. S. EPA Region 5 Signature/Date:

Denise Boone 7/29/08

Quality Assurance Reviewer
U. S. EPA Region 5 Signature/Date:

Richard L. Bryant 7/29/08

Approval:
Margaret Brunette, Project Manager
Wisconsin Department of Natural Resources (WDNR) Signature/Date:

Primary Laboratory (TestAmerica-Denver) Approval:
Kae Yoder, Project Manager Signature/Date:
Karen Kuoppala, QA Manager Signature/Date:

Laboratory (TestAmerica-Burlington) Approval:
Chris Anderson, Project Manager Signature/Date:
Kirstin McCrackern, QA Manager Signature/Date:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF.

SR-6J

July 30, 2008

Teresa C. Jordan, Project Coordinator
Milwaukee Solvay Coke and Gas Site RI/FS Group
c/o TERSCO Environmental Consulting
10265 Woodbury Road
Laingsburg, Michigan 48848

SUBJECT: Conditional Approval of the Remedial Investigation/Feasibility Study Work Plan (First Revision) for the Milwaukee Solvay Coke and Gas Site in Milwaukee, Wisconsin

Dear Ms. Jordan:

The United States Environmental Protection Agency (U.S. EPA) is providing a conditional approval of the First Revision of the Remedial Investigation/Feasibility Study (RI/FS) Work Plan dated June 2008, for the Milwaukee Solvay Coke and Gas Site in Milwaukee, Wisconsin.

The work plan is being approved based on the following conditions:

1. The latest version of the Regional Screening Levels for Chemical Contaminants at Superfund Sites shall replace the Region 9 Preliminary Remediation Goals (PRGs). Effective immediately by directive from U.S. EPA Headquarters, the Regional Screening Table (dated June 2008) has replaced the Region 9 PRGs table. A work plan revision is not necessary; however, the latest version of the Regional Screening Levels shall be used in the RI/FS report.

The Regional Screening Levels are significantly different from the Region 9 PRGs. For example, the screening levels for some chemicals, such as, acetophenone were not available in the Region 9 PRGs but are included in the Regional Screening Levels. Additionally, some chemical have been changed from non-carcinogenic to carcinogenic. 1,1-dichloroethane is a non-carcinogen in the Region 9 PRGs but is a carcinogen in the new guidance.

2. Table 7-1, correct the typo, change “1,1,2-trichloro-1,2,2-trifluoromethane” to “1,1,2-trichloro-1,2,2-trifluoroethane”.

If you have any questions concerning this letter, please feel free to contact me at (312) 886-6217 or e-mail me at boone.denise@epa.gov.

Sincerely yours,



Denise Boone
Remedial Project Manager

cc: Margaret M. Brunette, WDNR