Twin Ports Testing, Inc.



1301 N. 3rd St. • Superior, WI 54880 • 715-392-7114 • 800-373-2562 • FAX 715-392-7163 P.O. Box 16246 • Duluth, MN 55816-0246 • 218-722-1911 P.O. Box 2 • Virginia, MN 55792 • 218-741-5785

www.twinportstesting.com

Mr. David V. Kalet, Environmental Project Manager Atlantic Richfield Company 28100 Torch Parkway Mail Code 2 South Warrenville, Illinois 60555 2 June 2006 TPT # 05e-2150

re:

Soil Management Work Plan Jones Development Property Halvor Lane Superior, Wisconsin

Dear Mr. Kalet:

I am writing in response to your request for a copy of our project's Soil Management Work Plan associated with the upcoming excavation of the Jones Development property in Superior, Wisconsin.

As you know, Jones Development plans to excavate approximately 15,000 cubic yards of surface soils from the property for its redevelopment project, with 7000 yards to be disposed of at the city of Superior's Moccasin Mike Landfill. While the excavation was expected to commence this fall, the city recently requested that all soils destined for the landfill be delivered by June 15th. In consideration of this request, the general contractor, Reuben Johnson and Son, Inc., has scheduled a preliminary excavation (limited to 7000 yards) as a first stage, to begin this coming Tuesday, June 6th. The second stage of the excavation, commencing some time this fall, will deal with the remainder of the soils, a portion of which will be disposed of at the Reuben Johnson quarry, and a portion to be re-integrated for landscaping material on the Jones property. The following Soil Management Work Plan applies to both stages of the excavation.

If you have any questions or comments regarding the following Work Plan, please call me directly at 715-392-7114.

Sincerely,

Twin Ports Testing, Inc.

Jon Hinkel, P.G.

Project Management Leader



1301 N. 3rd St. • Superior, WI 54880 • 715-392-7114 • 800-373-2562 • FAX 715-392-7163 P.O. Box 16246 • Duluth, MN 55816-0246 • 218-722-1911

P.O. Box 2 • Virginia, MN 55792 • 218-741-5785 www.twinportstesting.com

SOIL MANAGEMENT WORK PLAN SURFACE EXCAVATION

JONES DEVELOPMENT PROPERTY SUPERIOR, WISCONSIN

I. INTRODUCTION

An excavation of surface and near-surface soils will be conducted during the 2006 season on the Jones Development Property in preparation for the property's redevelopment with a FedEx ground-shipping terminal. Parties principally involved in this portion of the project are as follows:

Jones Development Company, developer 4600 Madison, Suite 725 Kansas City, Missouri 64112

contacts:

Kevin Jones, present

Jim Markey, project manager

Reuben Johnson & Son, Inc., general contractor 5300 Stinson Avenue Superior, Wisconsin 54880

contact:

Paul Senst, project manager

phone: 715-394-7771 fax: 715-395-6953

phone: 816-756-5700

fax: 816-756-5701

Twin Ports Testing, Inc., environmental consultant 1301 N. 3rd Street Superior, Wisconsin 54880

contact:

Jon Hinkel, project manager

phone: 715-392-7114 fax: 715-392-7163

The soil unit to be excavated is characterized as a non-native red-brown clay present throughout the property's extent, extending laterally to a depth of 2 to 21/2 feet. One rectangular area located on the property's west-central portion will be excavated below the red-brown clay into the native soil to a depth of 4 to 5 feet. Some areas of the redbrown clay unit have been identified as contaminated with low levels of petroleum and lead, rendering the classification of such soils as solid waste upon excavation. Those contaminated soils of high clay content have been approved for disposal at the city of Superior's Moccasin Mike Landfill. Those soils that are not classified as solid waste are unregulated and have been approved for disposal as common fill material at the Reuben Johnson & Son's quarry located south of Superior. Those soils indicated as being

contaminated but lacking adequate clay content will be integrated on the Jones Development property as landscaping material.

The total volume of soil to be excavated is estimated at 15,000 cubic yards. Based on the various soils analyses completed to date, the following distribution by volume is projected:

 contaminated soil of high clay content to be disposed of at the Moccasin Mike Landfill

7000 cu. yds.

 uncontaminated soil to be disposed of at the Reuben Johnson quarry

6370 cu. yds.

 contaminated soil to be incorporated on site as landscaping material 1630 cu. yds.

Total:

15,000 cu. yds.

The excavation pattern is based upon grid-sampling and laboratory determinations of soils' characteristics (Figure 1: Excavation Pattern). The actual excavation will be limited to the boundaries of the footprint of the planned development (Figure 2: Development Plan).

The soil will be excavated in two stages with the first stage scheduled to commence on Tuesday, June 6th, 2006; the second stage of excavation will commence during the fall of 2006 (exact date undetermined). Each excavation stage is expected to require one week to complete. The entire 7000 cubic yards destined for the Moccasin Mike Landfill will be excavated and delivered during the first stage of the excavation.

II. FIELD ACTIVITIES

Reuben Johnson & Son will perform the excavation and trucking services during both stages of the excavation. Twin Ports Testing will supply a geologist / qualified soils technician to oversee the field operations (see attached resumes). Oversight of the field operations will involve the following tasks:

- keep a log of the field operations;
- keep a photographic record of the operation;
- monitor all soils being excavated for visual appearances including apparent clay / large aggregate content
- monitor all soils being excavated for petroleum contamination through field screening of selected samples. Field screening will be conducted using a portable photoionization detector;
- inform and redirect excavators / truckers if exposed or excavated soils appear unsuitable for their planned destinations;

- collect three representative soil samples for soils destined for landfill disposal (one for every 3000 yards excavated). These samples will be analyzed for Atterberg limits;
- collect one soil sample for every 2000 yards of soil excavated regardless of destination. These samples will be analyzed for petroleum volatile organic compounds, polycyclic aromatic hydrocarbons and lead.
- keep a running estimation of volumes excavated based on truck loads leaving the site.

Excavated soils will be directed to the Moccasin Mike Landfill, to the Reuben Johnson & Son's quarry, or will be stockpiled on the Jones Development property for later landscaping use (Figure 3: Landfill and Quarry Locations).

III. CONCLUSION

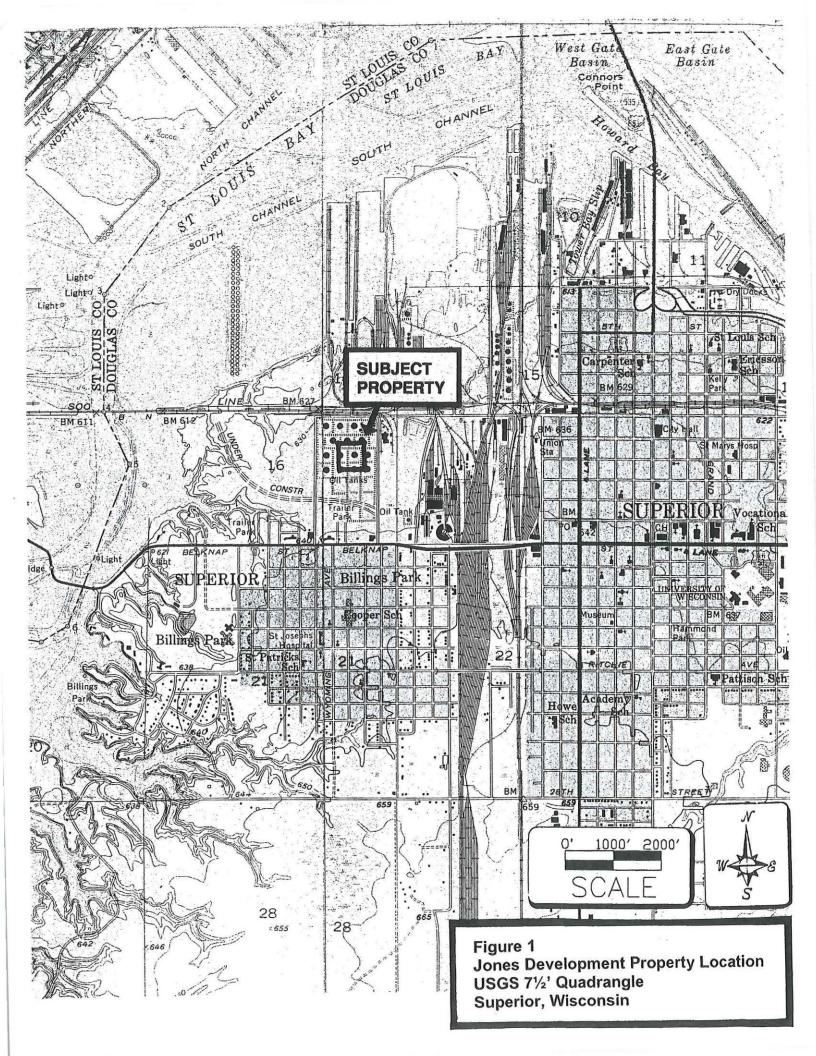
At the conclusion of the first stage of the excavation, Twin Ports Testing will compile a short interim report summarizing the field procedures and providing the laboratory results for all parties concerned. The interim report will be integrated into the landfill's Final Cover Construction Documentation Report, to be completed by Ayres Associates for the city of Superior. At the conclusion of the second stage of the excavation, a comprehensive report will be completed and likewise distributed.

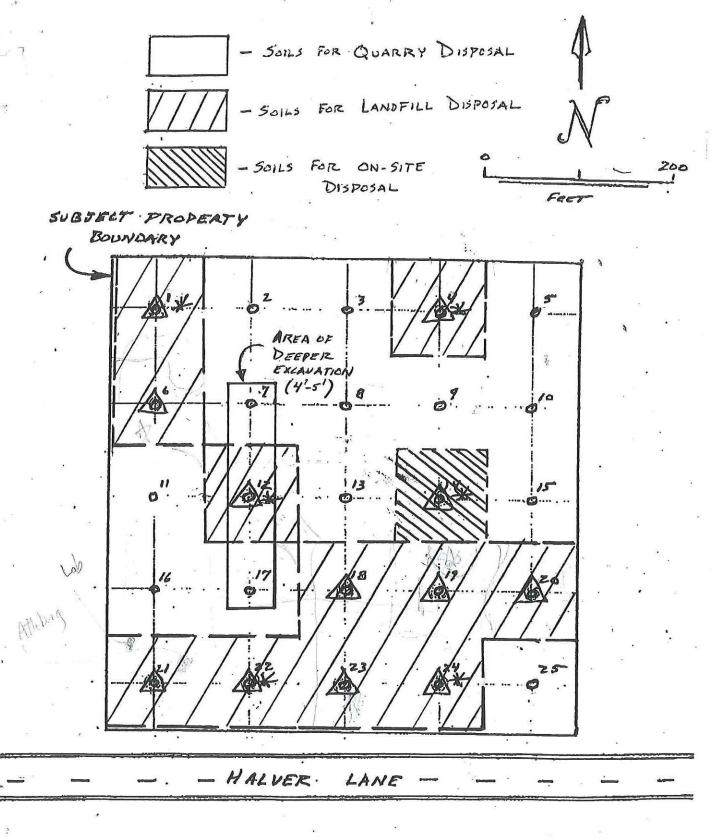
Questions or comments regarding the content of this Soil Management Work Plan may be directed to Jon Hinkel at Twin Ports Testing at 715-392-7114.

This Work Plan was completed June 2nd, 2006. Twin Ports Testing, Inc.

Jon Hinkel, P.G.

Project Management Leader TPT Environmental Department





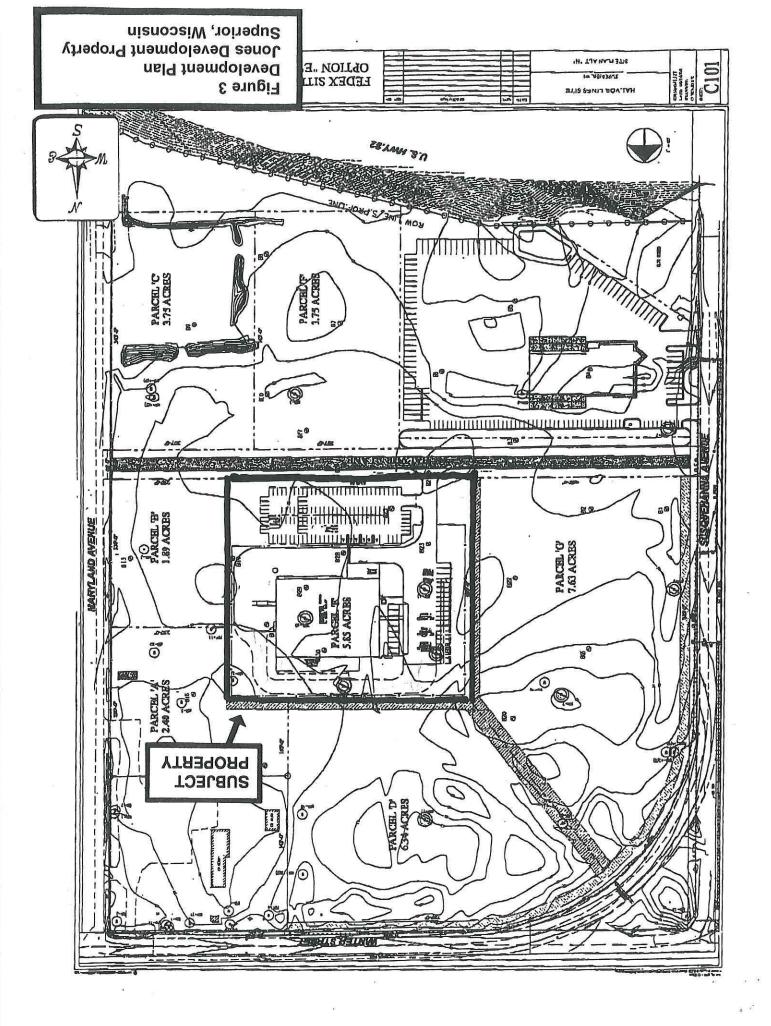
· Soil sampling location · ("elean" soil indication)

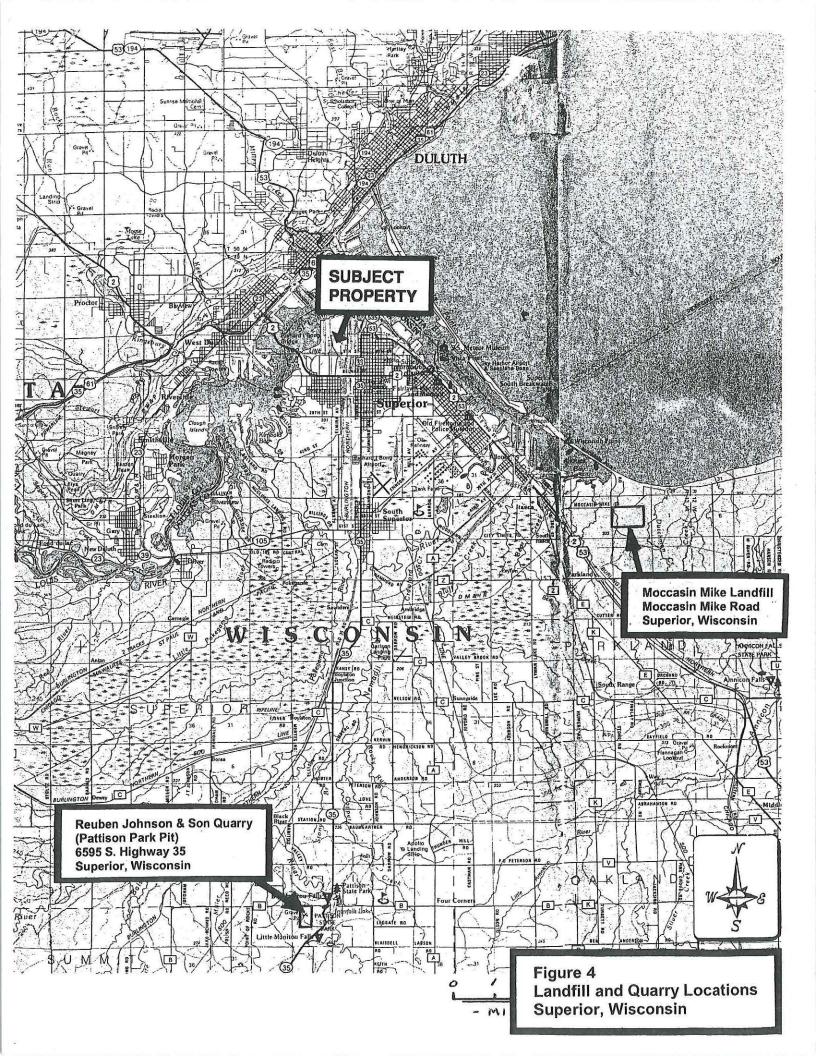
A Indication of RCL exceedence at the

sampling point

* Indicates whees sample was physical Analysis

Figure 2
Excavation Pattern
Jones Development Property
Superior, Wisconsin





RESUME OF TWIN PORTS TESTING, INC. PERSONNEL

JON HINKEL, P.G.

Project Management Leader

EDUCATION

1989:

Ohio University, Athens, OH - M.S. Environmental Studies

1986:

University of Minnesota, Duluth, MN - B.S. Geology

PROFESSIONAL AFFILIATIONS, CERTIFICATIONS & TRAINING

Registered Professional Geologist: Minnesota and Wisconsin

Member: Geological Society of America, American Institute of Professional

Geologists, Minnesota Groundwater Association

Designer Certification: Storm Water Pollution Prevention Plans: Minnesota

Registered Monitoring Well Contractor: Minnesota Dept. of Health

OSHA 40 hour Hazardous Materials Training

Wisconsin Dept. of Commerce Registered Consultant and Site Assessor

WORK EXPERIENCE

1991-Present:

Twin Ports Testing, Inc., Duluth, Minnesota and Superior, Wisconsin

Responsibilities:

Project Management Leader: manage and conduct and Phase I and Phase II Environmental Property Assessments, Environmental Assessments and NEPA studies; design and conduct remedial investigations and corrective action projects involving petroleum, heavy metal and pesticide contamination.

2000-2001:

University of Wisconsin Superior, Superior, Wisconsin

Responsibilities:

Instructor, part-time: teach Environmental Geology, Earth Science and

associated lab courses.

1990-1991:

West Virginia University/Parkersburg, Parkersburg, West Virginia

Responsibilities:

Instructor, full time: teach Physical Geology, Historical Geology, Physical Science I (Introduction to Physical Geology, Meteorology, and Astronomy), Physical Science II (Introduction to Chemistry and Physics), associated lab

courses, and Arithmetic; serve as a student advisor.

RESUME OF TWIN PORTS TESTING, INC. PERSONNEL

JUSTIN J. MORRELL, C.E.T.

Civil Engineering Technician

EDUCATION

1995-1998 Graduate - Grand Forks Community High School

PROFESSIONAL CERTIFICATIONS & TRAINING

Nuclear Density Gauge - operation and safety
A.C.I Concrete Field I
MNDOT Concrete Field I
MNDOT Concrete Plant I
MNDOT Aggregate Production
MNDOT Bituminous Plant I

Radiographers Assistant training through TPT

WORK EXPERIENCE

2004 - Present: Twin Ports Testing, Inc. Superior, WI. Civil Engineering Technician.

Responsibilities include: Quality control (field and laboratory) inspector of concrete, soil and aggregate, including the following tests: gradations, Proctors, Atterberg

limits, hydrometer, nuclear density, construction inspection and documentation.

2004 - 2004 Interstate Testing Inc. Grand Forks ND. Civil Engineering Technician.

Responsibilities include: Quality control (field and laboratory) inspector of concrete, soil and aggregate, including the following tests: gradations, Proctors, Atterberg limits, hydrometer, nuclear density, construction inspection and

documentation

TYPICAL PROJECTS

2004: Army Corp of Engineers - Field Inspector of soils, earthwork, concrete, water

diversion system for earth and structural dike project for the cities of Grand Forks

and East Grand Forks, ND.

2004: Army Corp of Engineers – Field inspector of Concrete related to foundations, floors,

sidewalks. Quality Assurance for compaction of soils. Grand Forks, ND Air Base

expansion project.

2005: City of Duluth - Field inspector for Arrowhead road up-grade project. Testing of

construction materials for project

2004-05: Minnesota Power - Field inspection of concrete footings for Arrowhead-Weston

Transmission Line