

# DEEP TROUBLE

When Design-Phase Simplicity Meets Construction-Phase Reality

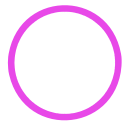


John Roberts / Gordon Araujo



March 29, 31 and April 1, 2021

# 2020 EXCAVATION PLAN



Gas Holder #3  
100 foot Diameter  
15 foot Deep



Gas Holder #5  
60 foot Diameter  
21 foot Deep



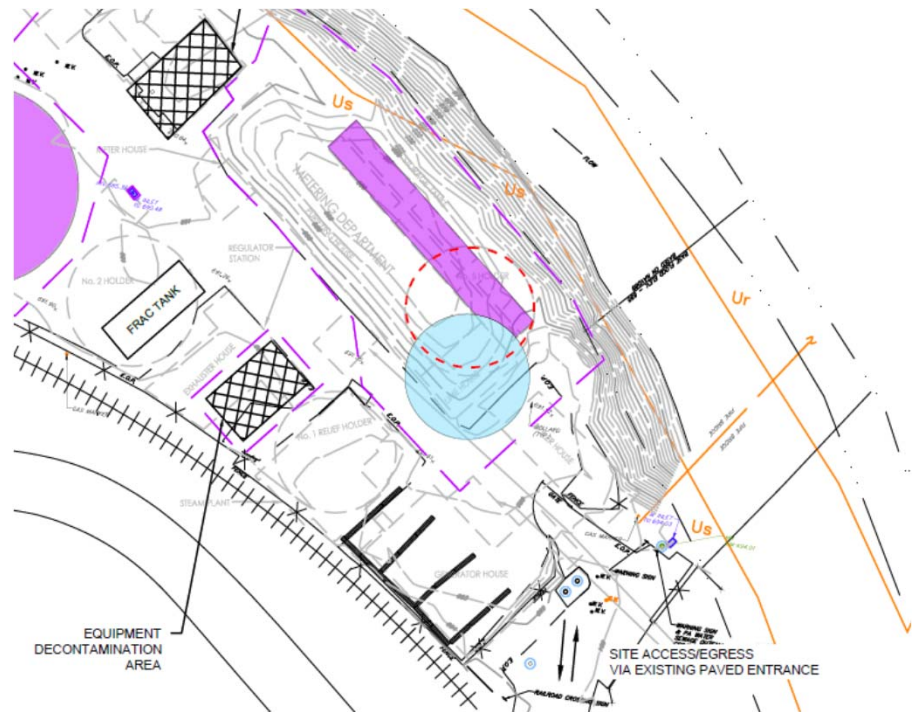
SCRANTON MGP SITE  
2020



# GAS HOLDER NO. 5

DESIGN DIAMETER:

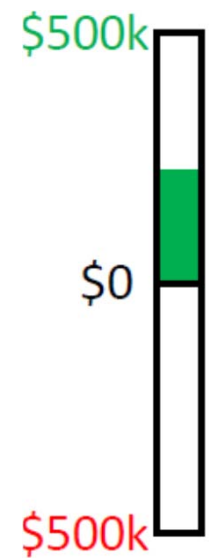
- 60 Feet



# GAS HOLDER NO. 5

ACTUAL DIAMETER:

- 40 Feet
- \$220,000 Saving







# Soil Boring Log

Depth Below Surface (Feet)	PIU (FPM)	Recovery	Sample Interval & ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
15	0.3			0-2" Asphalt Roadbase.		
0.3	0.3			0-40" - Fill - F-L S, some FC @ 31"-SR, some ML, F CH loose-medium, BAYN + concrete frags Wood @ 43" - 10 YR 3/1 - Red BAYN colors. Some grey 2.5Y 3/2		
0.16	0.3			0-31" - 0-24" STA - MC Sand + FC @ 24" - SR		
0.3	0.3			24-31" - Silty + FM sand, liq. 6% clay. ↓ 2.5Y 3/1		
0.3	0.3			24-26" - Stained, - faint maples		
0.4	0.3			0-31" - STA (0-24")		
0.3	0.3					
0.3	0.3					
1.0	1.0			Refusal @ 15'		

# BORING H3-B1

Depth Below Surface (Feet)	PIU (FPM)	Recovery	Sample Interval & ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
10.0	0.3			0-31" - STA (0-24")		
0.3	0.3					
0.3	0.3					
0.3	0.3					
15.0	1.0			Refusal @ 15'		
20.0						

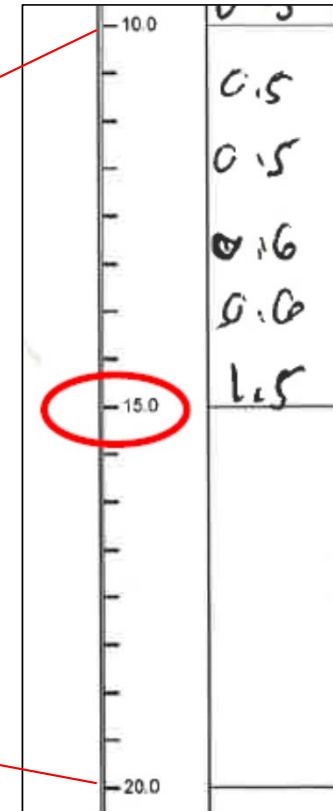


# Soil Boring Log

Project Name: UGI Scranton Bridge St.	SBMW ID: H3-B2
Project #: 213402350	Total Depth: 151
Location: Scranton PA	Screened Interval:
Date Drilled: 1/22/19	Sampling Method: Macrocore
Driller: Advanced Drilling	Monitoring Device: PID
Static Water Level:	Logged by: Cdunning

Depth Below Surface (Feet)	PID (ppm)	Recovery	Sample Interval (ft)	Lithologic Description	USCS Classification	Depth Below Surface (Feet)	
0.5				22-24" Concrete. 2.5' 2.5/1 Brick + concrete frags 0-6" some ml, lil clay. Fill - FC sand some FC Gravel SA-SR.		0.5	
0.6						0.6	
0.4							0.4
0.6							0.6
2.4							2.4
0.8					0-4" concrete		0.8
0.7				4-12" Silty F sandy F gravel, some ml MC sand + gravel, clay.		0.7	
0.0							0.0
0.7							0.7
0.5				12-32" F sand some ml, mc sand, TCG SR.		0.5	
0.5				0-22" SAA		0.5	
0.5				22-23" Brick mounds		0.5	
0.16						0.16	
0.0						0.0	
1.5				EOB.		1.5	

# BORING H3-B2



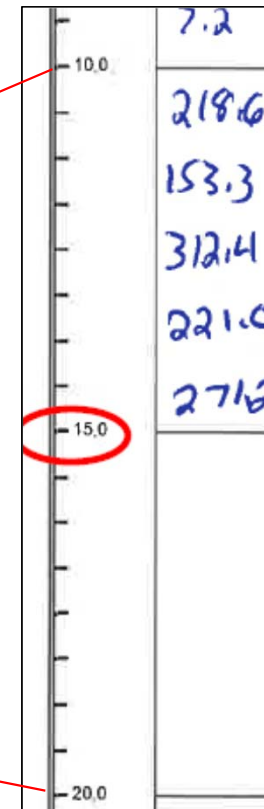




# Soil Boring Log

Depth Below Surface (Feet)	Surface (Feet)	PTD (ft)	Recovery	Sample Interval & ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
0.5					0-25" - F. 1/2" F-C Sand, some MS, F/G SA-R Lil clay, 102R 312		
0.5			44		25-33" CONCRETE		
0.5					33-40" SA-C-25"		
1.4					40-44" CONCRETE + BRICK		
5.2					0-15" BRICK - SPRINGERS OR MAP, SCREEN. STR 3/4 MAPACTS.		
11.2					15-25" M.C Sand Same as sand - 5/16, with Lil FCGRAV.		
17.4			25"		21-25" Gravelly PS.		
4.3							
7.2							
219.6					0-20" - Full of soft brick debris F Sand - Coarse, well graded,		
153.3							
312.4			20"				
221.0							
271.2							

# BORING H3-B3



March 29, 31 and April 1, 2021

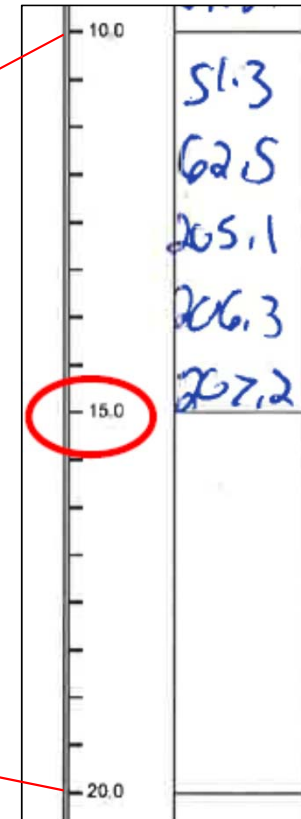


# Soil Boring Log

Project Name:	UGI Scranton Bridge St.	SBMW ID:	H3-B-1
Project #:	213402550	Total Depth:	15'
Location:	Scranton PA	Screened Interval:	
Date Drilled:	7/22/18	Sampling Method:	Macrocore
Driller:	Advanced Drilling	Monitoring Device:	PID
Static Water Level:		Logged by:	Cdunning

# BORING H3-B4

Depth Below Surface (Feet)	PID (PPM)	Recovery	Sample Interval ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
1.4				0-8" - CLG sand, some m.c.sand, L.W. sand, silty clay 3/1		
1.2				8-16" - BRICK		
15.8		30"		16-28" - F. 1/1 - MEF-C sand, some MFCGnu, SR+SR, L.W. silt, F. clay		
11.9				28-36" - Brick + concrete		
11.1						
6.4				0-14" BRICK w/ blobs of msp. wood @ bottom of core		
23.3		19"		SR 3/2		
14.2						
21.1						
21.2						
51.3				0-11" - m.c.sand (BRICK material) + wood chips		
62.5				some MEF-C gnu, SR - Blobs SR 3/2		
205.1		27"		11-27" - Dark Brown woodchips + silty p.sand, grains, some clay		
206.3				SR 3/1		
207.2						



March 29, 31 and April 1, 2021

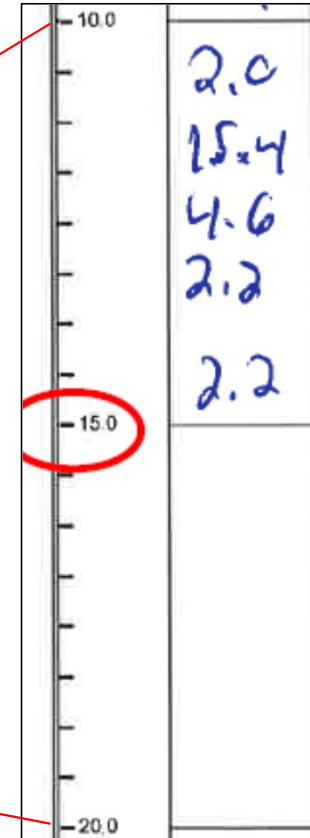


# Soil Boring Log

Project Name: UGI Scranton Bridge St.	SBMW ID: H3B5
Project #: 213402550	Total Depth: 15
Location: Scranton PA	Screened Interval:
Date Drilled: 1/22/16	Sampling Method: Macrocore
Driller: Advanced Drilling	Monitoring Device: PID
Static Water Level:	Logged by: Cdunning

## BORING H3-B5

Depth Below Surface (Feet)	RD (FPM)	Recovery	Sample Interval & ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
0.5				0-3" Asphalt Road base		
0.8				3-45" 7-11" P-C sand, some gravel + P-C gravel		
1.0		48"		BRICK CONCRETE FRAGS. - 2.54 311		
0.6						
1.1						
1.1				0-3" STA-grades coarse w/ debris		
1.5						
1.7		3"				
0.9						
0.9						
2.0				0-14" FC gravel, some m/sand, L/L F sand		
15.4		20"		STA-SR - watch IPS - 2.54 311		
4.6				14-20" MF sand, some C sand, L/L FC gravel		
2.2				STA-SR		
2.2				20-26" STA 0-14" concrete @ 234		



# GAS HOLDER DE-WATERING

“John, we have the pump set at 23 feet and have it de-watered down to 15 feet. Everything is going great.”





# Soil Boring Log

Project Name: UGI Scranton Bridge St.	SBMW ID: H3B5
Project #: 213402550	Total Depth: 15'
Location: Scranton PA	Screened Interval:
Date Drilled: 1/22/16	Sampling Method: Macrocore
Driller: Advanced Drilling	Monitoring Device: PID
Static Water Level:	Logged by: Cdunning

## BORING H3-B5

Depth Below Surface (Feet)	RD (PPM)	Recovery	Sample Interval & ID	Lithologic Description	USCS Classification	Depth Below Surface (Feet)
0.5				0-3" Asphalt Road base		0.5
0.8				3-45" - 7" - 11" P-C sand, some gravel + FCGM. STA-SR		0.8
1.0		48"		8.14" - concrete frags. - 2.54 3/1		1.0
0.6						1.1
1.1				0-3" STA-grades coarse w/ debrn		1.1
1.5						1.5
1.7		3'				1.7
0.9						0.9
0.9				0-14" FCGM, some gravel, some sand, L.F. Sand STA-SR - watch 1/5 - 2.54 3/1		0.9
2.0						2.0
15.4		20"		14-20" MF Sand, some C sand, L.F. FCGM STA-SR		15.4
4.6				20-26" STA 0-14" - concrete @ 23 1/4		4.6
2.2						2.2
2.2						2.2

Concrete @ 23 1/4

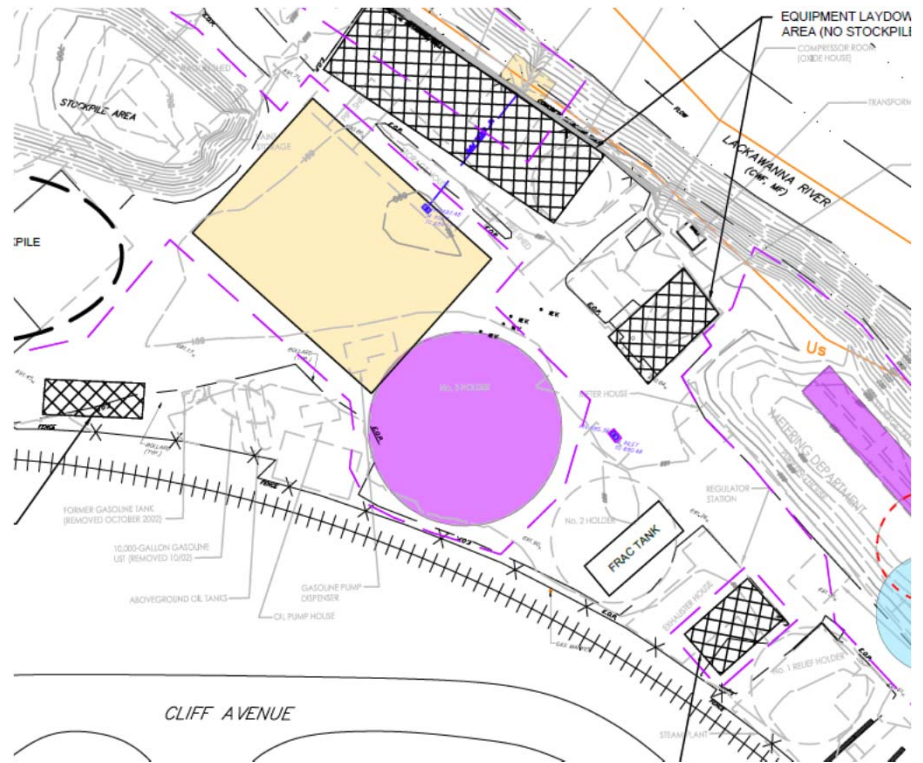
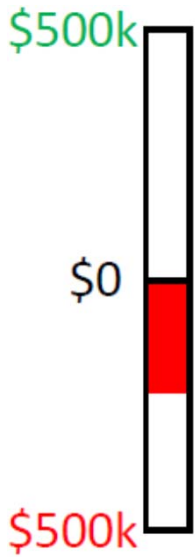


March 29, 31 and April 1, 2021

# GAS HOLDER NO. 3

ACTUAL DEPTH:

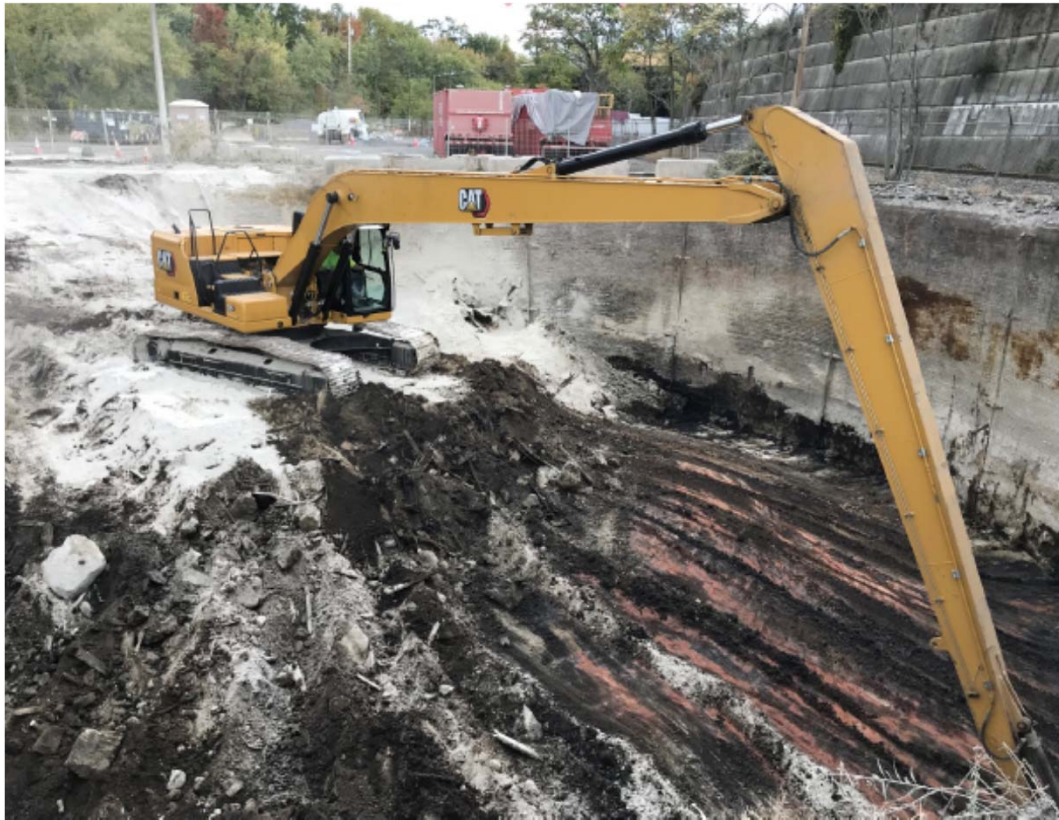
- 23 Feet
- \$475,000 Cost



# A “DUMPLING”



# OUR "DUMPLING"

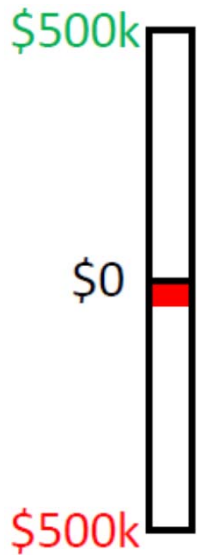




# GAS HOLDER NO. 3

## ACTUAL DEPTH:

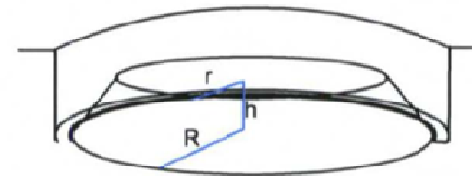
- 15 - 23 Feet
- \$210,000 Savings



The simple calculation for working out the volume of a cone can be used to roughly estimate its size. This calculation is the volume of a cone =  $(\frac{1}{3}) \times \pi \times \text{Radius}^2 \times \text{height}$ . This calculation does not take into account that the dumpling was often a wide short cone with a flat top (a lustrum of a cone), with the angles dependent on the strata. A more accurate approach would therefore be to work out the area of a frustum of a cone as below.

$$V = \frac{(\pi \times h)}{3} (R^2 + r^2 + Rr)$$

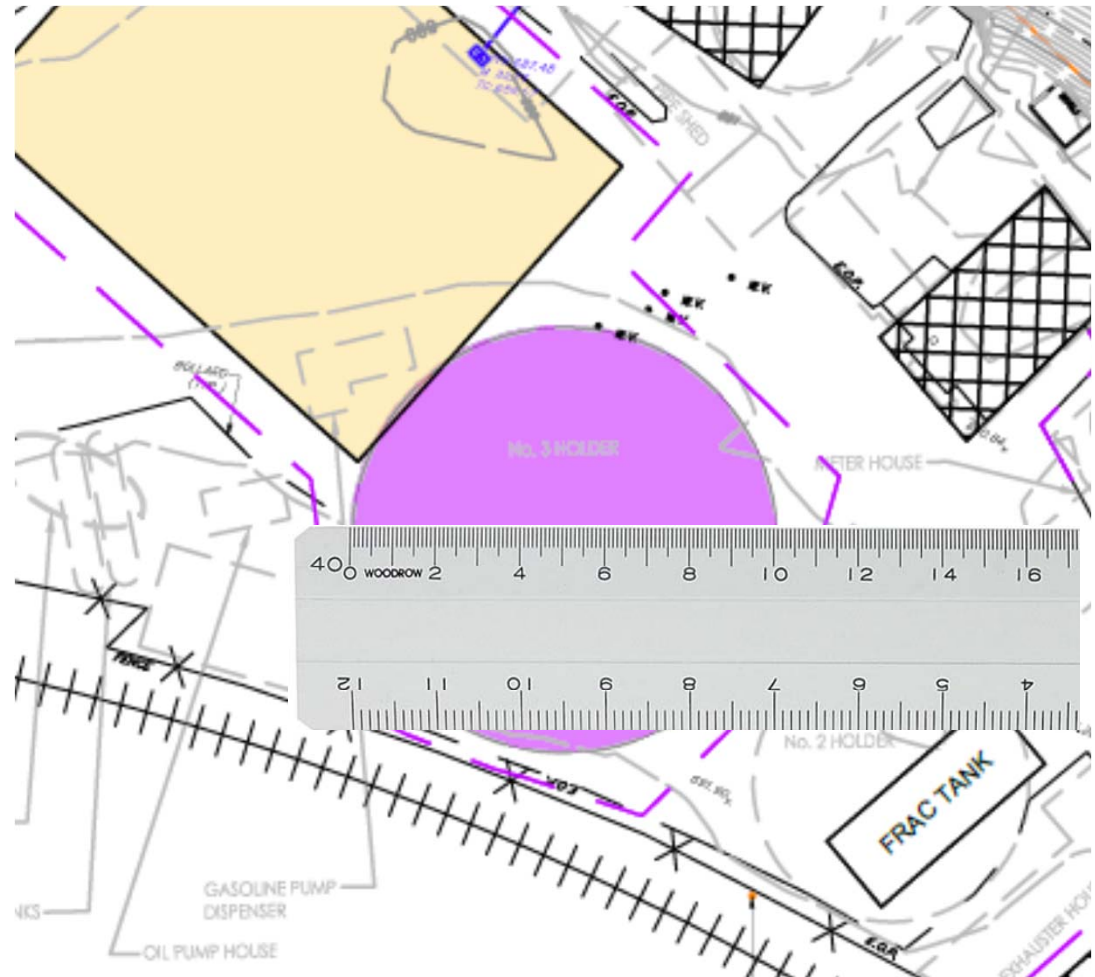
v = volume  
h = height  
R = radius of the base of cone,  
r = radius of the top of the cone

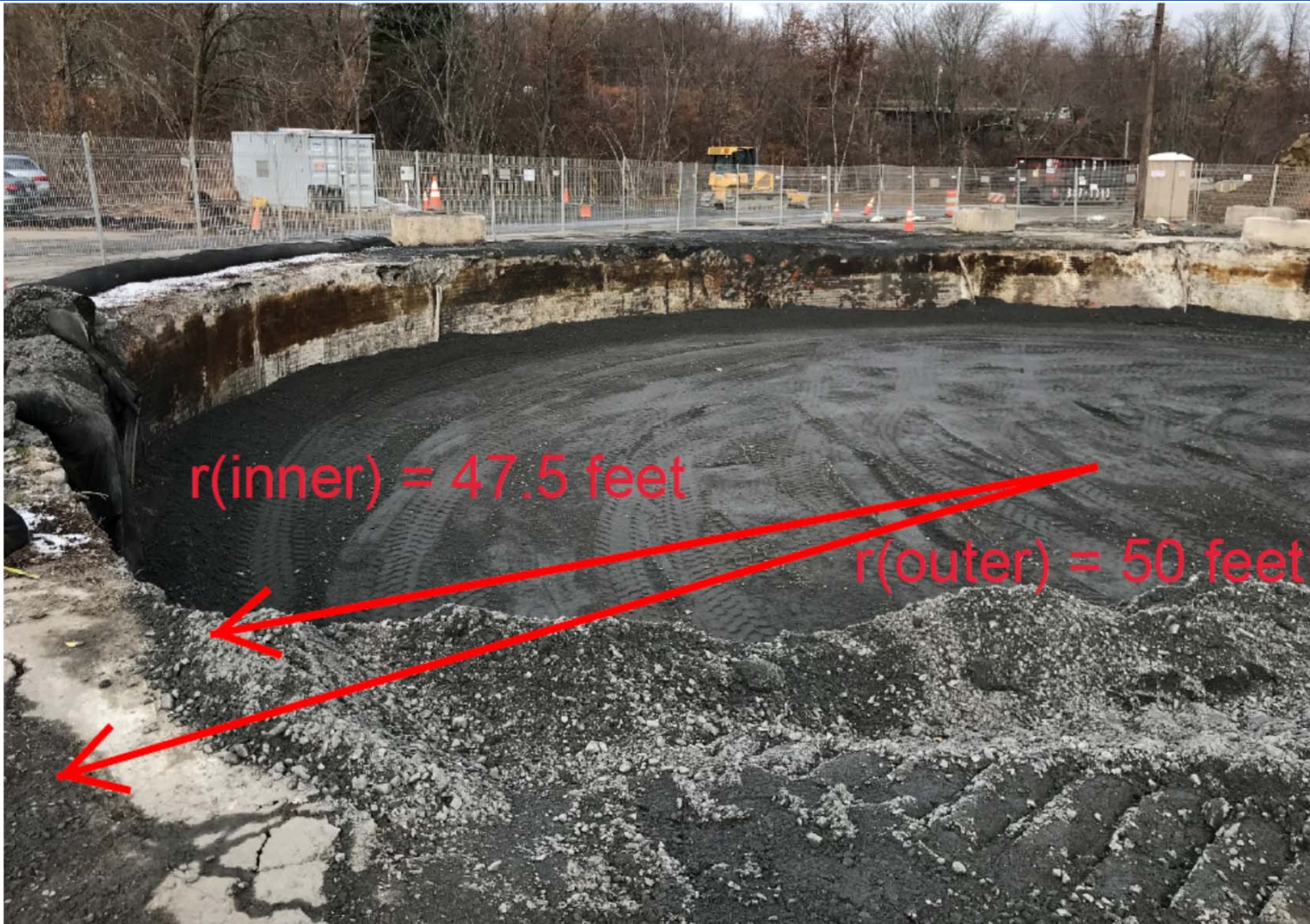


# GAS HOLDER NO. 3

DESIGN DIAMETER:

- 100 Feet



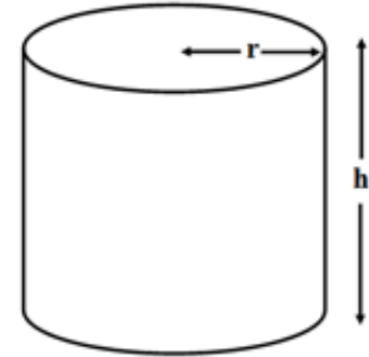


# GAS HOLDER NO. 3

ACTUAL (INNER) DIAMETER:

- 95 Feet

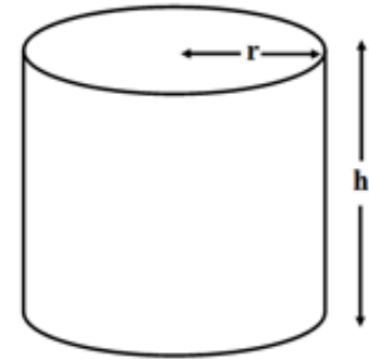
$$V = \pi r^2 h$$



$$\frac{\pi (47.5')^2 \times 23'}{\pi (50.0')^2 \times 23'} = ???$$

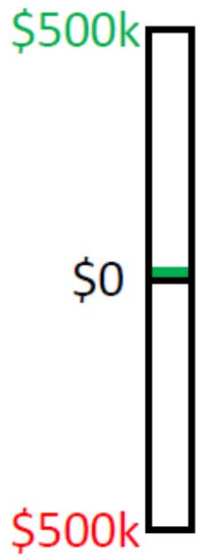
# GAS HOLDER NO. 3

$$V = \pi r^2 h$$



ACTUAL (INNER) DIAMETER:

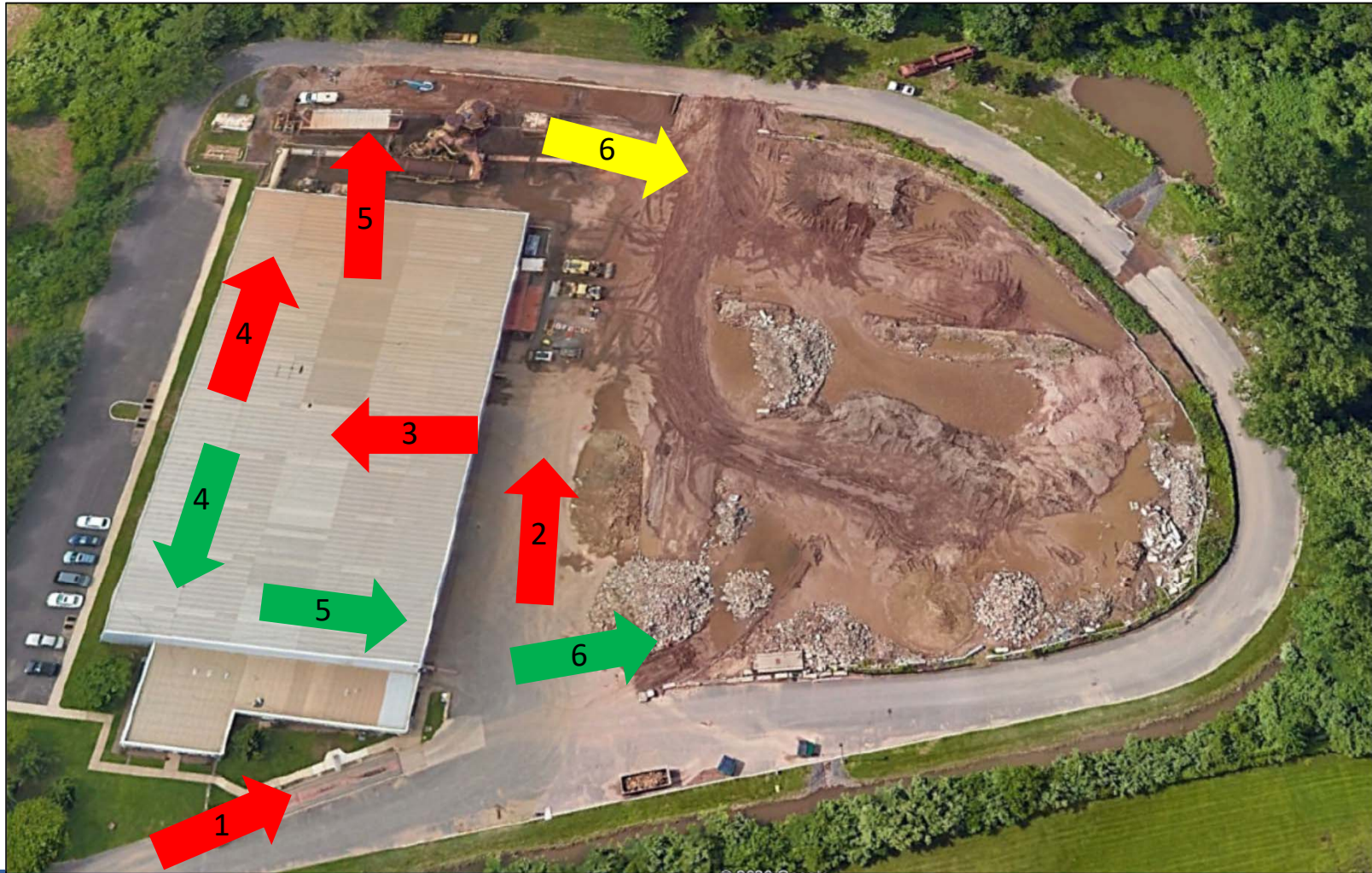
- 95 Feet
- \$75,000 Saving



$$\frac{\pi (47.5')^2 \times 23'}{\pi (50.0')^2 \times 23'} = 0.9$$

# THERMAL TREATMENT FACILITY





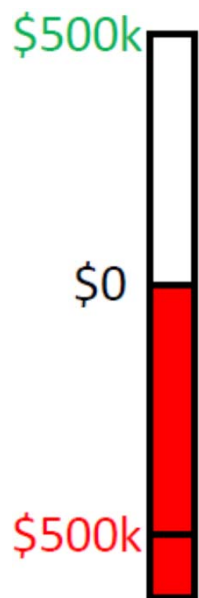
# ASBESTOS TILE IN DEBRIS STOCKPILE





# REJECTED SOIL ON-SITE (HAZARDOUS DISPOSAL???)

- TCLP Benzene > 0.5 mg/L
- Estimated 2,000 Tons
- **\$640,000 Cost**



# BATTERY RECYCLERS vs USEPA (APRIL 21, 2000)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 19 2000

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Ms. Regina J. Mahoney  
Director of MGP and Special Projects  
Vectren Corporation  
1630 North Meridian St.  
P.O. Box 44945  
Indianapolis, IN 46244-0945

Dear Ms. Mahoney

Thank you for your August 10, 2000 letter regarding evaluation of manufactured gas plant (MGP) remediation waste and the recent court decision on application of the Toxicity Characteristic Leaching Procedure (TCLP) test to this waste. In *Association of Battery Recyclers, Inc., et al. v. US Environmental Protection Agency* (April 21, 2000), the court vacated the Environmental Protection Agency's (EPA) use of the TCLP test to evaluate the leaching potential of MGP remediation waste for the purpose of classifying the waste as hazardous. EPA acknowledged the Court's action in its recently proposed rules on Corrective Action Management Units (65 FR 51087, footnote 6, August 22, 2000). Your letter requested clarification of the practical impact of this court ruling, and asked how EPA would implement the ruling.

Under the Court's opinion, the TCLP leach test cannot be used under RCRA to determine whether MGP waste is hazardous. Since MGP remediation waste is not a listed hazardous waste, it would only be classified as RCRA hazardous if it exhibited any one of the ignitable, corrosive, or reactive hazardous characteristics (40 CFR 261.21, 22, or 23) or if it is mixed with a listed waste. MGP remediation wastes are unlikely to exhibit these hazardous characteristics. Therefore, absent the TCLP test, MGP remediation wastes are unlikely to be RCRA hazardous waste under the federal program, and would not be required to meet RCRA requirements, including Land Disposal Restriction requirements. Some states do have hazardous waste regulatory programs that are broader in scope than the federal program. It is therefore important to know how state waste management requirements apply to excavation of MGP remediation wastes.

**Under the Court's opinion, the TCLP leach test cannot be used under RCRA to determine whether MGP waste is hazardous. Since MGP remediation waste is not a listed hazardous waste, it would only be classified as RCRA hazardous if it exhibited any one of the ignitable, corrosive, or reactive hazardous characteristics (40 CFR 261.21, 22, or 23) or if it is mixed with a listed waste. MGP remediation wastes are unlikely to exhibit these hazardous**

**SAME**



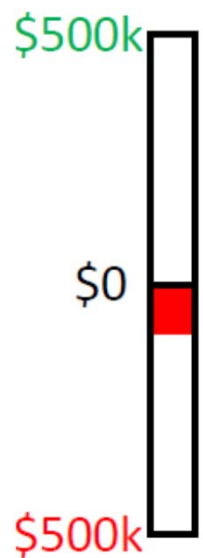
**DCHWS**

Design and Construction Issues at Hazardous Waste Sites

March 29, 31 and April 1, 2021

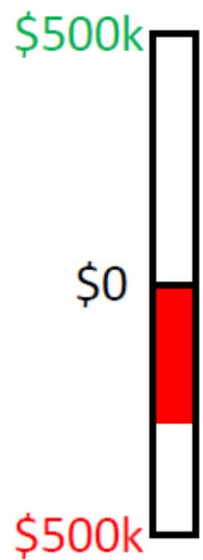
# REJECTED SOIL ON-SITE (NON-HAZARDOUS WASTE)

- TCLP Benzene > 0.5 mg/L
- Estimated 2,000 Tons
- \$505,000 Saving



# REJECTED SOIL ON-SITE (NON-HAZARDOUS WASTE)

- Estimated 2,000 Tons
- Actual 3,200 Tons
- **\$170,000 Cost**



JANUARY 13, 2021 @ 0615 HRS



# REJECTED MATERIAL OFF-SITE

Screened Soil



Unscreened Soil

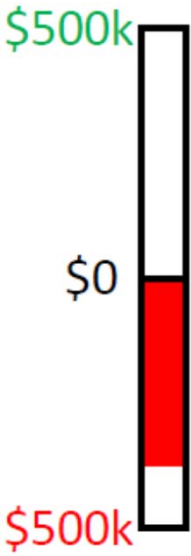


Co-Mingled Debris



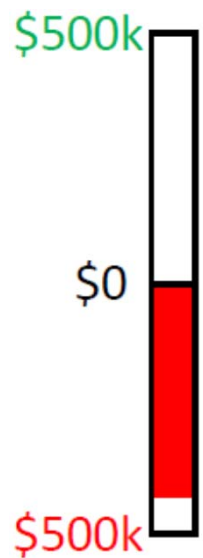
# SCREENED SOIL

- Gas Holder No. 3 Deep
- Est. 800 Tons
- TCLP Benzene > 0.5 mg/L
- Local Landfill Rejects
- **\$90,000 Cost**



# UNSCREENED SOIL

- Gas Holder No. 3 Shallow
- Est. 1,300 Tons
- TCLP Benzene < 0.5 mg/L
- Local Landfill Accepts
- **\$60,000 Cost**





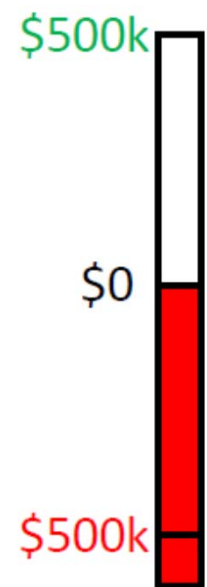
# CO-MINGLED DEBRIS

- Est. 2,000 Tons
  - 528 Tons UGI
  - 1,472 Tons Others
  - 5-6 Pounds Asbestos Tiles



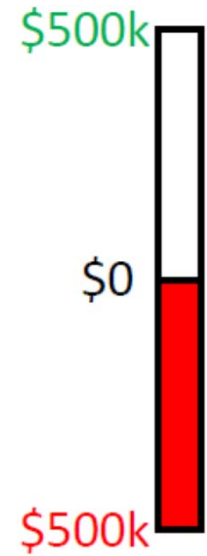
# CO-MINGLED DEBRIS

- Initial Offer
  - Local Landfill
  - \$85/Ton
  - **\$170,000 Cost**



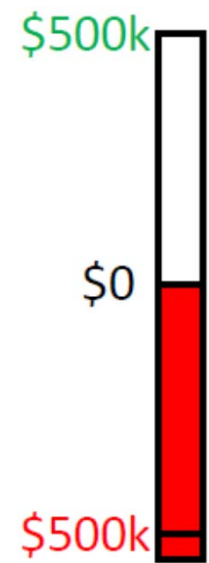
# CO-MINGLED DEBRIS

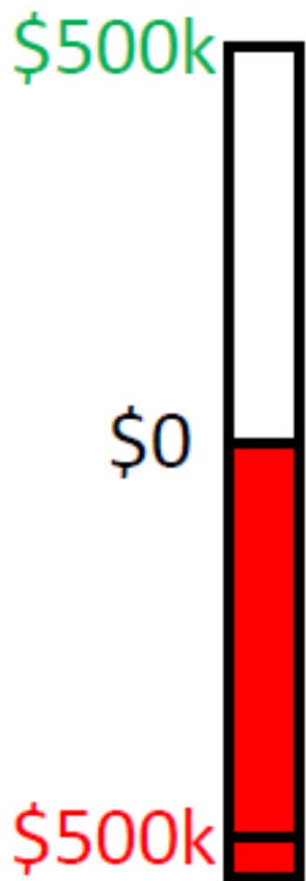
- Counter-Offer
  - \$85,000 Lump Sum
  - Incentive to Segregate
  - Cost Cap
  - \$85,000 Saving



# CO-MINGLED DEBRIS

- Final Agreement
  - \$115,000 Lump Sum
  - \$30,000 Cost





## INCREMENTAL COSTS

GAS HOLDER NO.5 - 40' DIAMETER:	\$220,000
GAS HOLDER NO.3 - 23' DEEP:	-\$475,000
THE "DUMPLING"	\$210,000
GAS HOLDER NO.3 - 95' DIAMETER:	\$75,000
REJECTED SOIL - HAZARDOUS:	-\$640,000
REJECTED SOIL - NON-HAZARDOUS:	\$505,000
REJECTED SOIL - 1,200 TONS EXTRA:	-\$170,000
SCREENED SOIL - TCLP BENZENE:	-\$90,000
UNSCREENED SOIL - LOCAL LANDFILL:	-\$60,000
DEBRIS - INITIAL OFFER:	-\$170,000
DEBRIS - COUNTER-OFFER:	\$85,000
DEBRIS - FINAL AGREEMENT:	-\$30,000
	<hr/>
	-\$540,000

# LESSONS LEARNED

- Be Careful With Assumptions

2.0	20"	0-14" - FC gravel, some MC sand, lit F sand SIT-SR - wood chips - 2.5% 311
15.4		
4.6		
2.2		
2.2		
2.2	14-20" - MF sand, some CSand, lit F gravel SIT-SR	
	20-26" - SIT-SR - Concrete @ 23%	

- Little Things (Can) Mean a Lot

$$\frac{\pi (47.5')^2 23'}{\pi (50.0')^2 23'} = 0.9$$

- Real-Time Cost Tracking/Forecasting

- Budget for Contingencies: 15% Built In
- But Black Swans Are Out There: 25% Over Budget



- Open, Clear Communication Between All Stakeholders

JANUARY 13, 2021 @ 0615 HRS

