DEVELOPMENT RESPONSE ACTION PLAN

for

Bloomington Substation
2700 East 80th Street
Bloomington, Minnesota 55425

Prepared for

Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401

Prepared by

ProSource Technologies, Inc.
277 Coon Rapids Boulevard
Suite 304
Minneapolis, Minnesota 55433

ProSource Project No. 237-04

July 16, 2004

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1.0 INTRODUCTION

On behalf of Xcel Energy, ProSource Technologies, Inc. (ProSource) has prepared this Development Response Action Plan (DRAP) for the Bloomington Substation located at 2700 East 80th Street in Bloomington, Minnesota (hereon referred to as "Site"). The purpose of the work will be to assist Xcel Energy with environmental issues related to decommissioning of the Site as a condition of the sale of its property to the Metropolitan Airports Commission (MAC).

1.1 Site Description

A site location map using the United States Geological Survey (USGS) St. Paul SW 7.5 minute topographic quadrangle base map is provided as Figure 1. The USGS coordinates for the site are the NW ¼ of the NE ¼ of Section 1, Township 27 North and Range 24 West within Hennepin County, Minnesota.

The Site is a rectangular piece of land approximately two acres in size and located southeast of the intersection of Interstate Highway 494 and 24th Avenue South. The Site was most recently used as an electrical substation with five single-story control house buildings, two large transformers, seven vacuum switches, a gas-filled circuit breaker, and two large transmission towers. The remainder of the Site is a grassy, vacant lot with scattered trees and shrubs present. A site map is included as Figure 2.

1.2 Site History

The Site was developed from farmland by the McCarthy Well Company in the mid-1960's and owned until 1986. In 1986, Xcel Energy acquired the Site by eminent domain in order to build an electrical substation to provide service to the nearby Mall of America. The construction of the existing electrical substation was completed in 1987. The Site was recently acquired by the MAC from Xcel Energy as part of a runway expansion project at the Minneapolis-St. Paul International Airport. As a result, the substation was subsequently de-energized and some decommissioning has occurred. A detailed discussion of the site history and prior site use is included in the accompanying June 30, 2000 and June 23, 2004 Phase I Environmental Site Assessments (ESAs) prepared by ProSource for the Site. The Phase I ESA was conducted to update a Phase I ESA dated June 30, 2000 for the Site and is included as an Appendix to the June 23, 2004 ESA report.

1.3 Previous Investigations

The June 30, 2000 and June 23, 2004 Phase I ESAs identified the areas surrounding two large transformers (Nos. 1 and 2) at the east and west sides of the Site as potential areas of concern or recognized environmental conditions (RECs). Absorbent materials were observed on the concrete pads below the transformers and evidence of permanent staining of the concrete pads was also observed.

According to Xcel Energy, the transformers and some related electrical equipment (i.e. switches and breakers) have been removed from the site since it was de-energized. Each transformer contained

transformer contained 234 gallons of mineral oil and a related selector switch contained an additional 181 gallons of mineral oil for a collective total of approximately 8,075 gallons each. Laboratory testing data of the mineral oil within each reservoir by Xcel Energy identified polychlorinated biphenyls (PCBs) at concentrations ranging from 2 to 11 parts per million. (Appendix A).

To further define the extent of these impacts, a Phase II ESA is proposed to be completed in the summer of 2004. The Phase II work plan was submitted to the MPCA VIC Program and approval is pending. The Phase II investigation will be focused primarily on the presence of soil or ground water impacts at the Site, if any, and any impact that may be related to land use prior to Xcel Energy's purchase of the property.

1.4 Project Objectives

The purpose of this DRAP is to present existing Site information and detail the response actions used to decommission the site and accommodate the planned future land use as buffer property. The objective is to meet MPCA VIC Program requirements to achieve a "No Further Action" determination letter for the planned response actions to decommission the site. Response actions include demolition of the buildings and structures at the Site, removal of concrete pads and slabs, screening of near-surface soil, and excavation of visually impacted soil.

2.0 DEVELOPMENT RESPONSE ACTION PLAN

This DRAP addresses the work tasks necessary to implement response actions related to decommissioning of the Site. Specifically, the DRAP outlines the procedures and methods for the removal/abatement of regulated or hazardous materials from buildings (if any), building demolition, and implementation of soil response actions. Additional environmental issues, contingency planning, proposed development, a tentative schedule and documentation are also addressed.

2.1 Building Demolition

Four switchgear buildings and a control house are located at the Site. The transformers have been removed from the site. The control house buildings are planned to be dismantled along with all related electrical service structures as part of the site decommissioning. Xcel Energy Special Construction staff or a private contractor will be used to provide demolition services for the balance of the structures (i.e. concrete foundations), soil excavation and hauling, and site restoration.

2.1.1 Removal of Restricted or Hazardous Materials

Prior to demolition, Xcel Energy will remove any miscellaneous parts, equipment and solid waste from the Site. They will also properly containerize and remove any liquids (oils, machinery fluids, etc.) prior to vacating the buildings. Xcel Energy will be required to address the removal, handling, transport and disposal of restricted and/or hazardous materials from buildings prior to demolition. All removal activities will be conducted in compliance with Local, State and/or Federal laws. The removal of sediment from any floor drains and/or the contents of any flammable waste traps will also be conducted at this time.

2.1.2 Building Dismantlement and Demolition Activities

As previously stated, Xcel Energy expects to dismantle the buildings for transport to a different location and reuse. The removal of any remaining above-grade materials and below-grade structures (including existing and former building foundations, buried debris and buried utilities) will be handled by either Xcel Energy Special Construction staff or a private contractor. City sidewalks, street pavement, and curbs and gutters to be used as part of future development activities will be protected from damage or replaced if damaged. At a minimum, Special Construction staff or the demolition contractor will be responsible for adhering to the following requirements, as they pertain to building demolition:

- Prior to demolition, ensure that service to all applicable on-site utilities are shut off and/or disconnected.
- Demolition of concrete foundations and related structures will be conducted by mechanical means (i.e. backhoe, ball and crane, etc.). The use of explosives will not be permitted.
- Excessive debris will be removed from all haul trucks prior to leaving the Site. Furthermore, all haul trucks must be covered when transporting debris from the Site.

- Demolished materials will be loaded, properly transported to and disposed of at an appropriate off-site facility (i.e. demolition landfill, recycling center, etc.). On-site staff will also be responsible for properly manifesting all regulated materials which leave the Site, if required.
- The contractor will be responsible for taking the appropriate measures to ensure the debris piles are appropriately secured at the end of each work day.
- All demolition activities will be conducted in compliance with local, state and/or federal rules and regulations.

2.1.3 Removal of Bituminous Pavement and Concrete

Concurrent with demolition activities, the contractor will also be required to remove, load, transport, and properly dispose of or recycle any bituminous pavement and/or concrete used in drive/parking areas of the Site. Restoration will primarily consist of backfilling shallow excavations and grading the site for proper surface water runoff consistent with the adjacent grade.

2.2 Soil Response Actions

Soil cleanup activities at the Site will consist of excavation and disposal of visually impacted soil related to operation of the electrical substation at the Site. The following sections detail the cleanup activities associated with implementation of each soil response action.

2.2.1 Site Preparation

Prior to starting work, all underground utilities will be cleared through the Gopher One-Call service. Clearing and grubbing of any trees and brush will also be conducted, as appropriate. Once clearing and grubbing, and demolition/dismantlement activities have been completed, excavation activities will be initiated. All work is anticipated to be completed in Level D personal protective equipment. A Health and Safety Plan (HASP) which all on-site personnel will be required to read and sign prior to the start of work is included in Appendix B.

2.2.2 Excavation, Hauling and Disposal

Excavation of impacted soil will begin once building demolition and removal of pavement/concrete have been completed. The planned excavation areas are depicted in Figure 3. Excavation activities will be conducted by using either a hydraulic excavator (backhoe) or front end loader. If necessary, clean overburden will be excavated, temporarily stockpiled, and used as clean backfill after the excavation has been completed and confirmatory sampling has been conducted. Once the impacted soil is encountered, it will be directly loaded into trucks, manifested and transported to an approved solid waste facility (landfill) for disposal.

ProSource field staff will be on-site to supervise and direct field activities. To ensure the health and safety of on-site personnel, air monitoring will be conducted during the excavation of soils impacted with petroleum, chlorinated solvents and/or other VOCs. Air monitoring will be conducted using a

photoionization detector (PID) to monitor for the presence of organic vapors. Additional requirements for excavation, hauling, and disposal are as follows:

- Special Construction staff or the contractor will be responsible for controlling fugitive dust and minimizing noise, odors, and off-site tracking to the extent possible.
- Excessive impacted soil will be removed from all trucks prior to leaving the Site. If necessary, trucks used to transport contaminated soil may require decontamination (i.e. steam cleaning) prior to leaving the Site, in order to minimize the tracking of contaminants off-site. Prior to demobilization from the Site, all on-site equipment used for excavation will be decontaminated.
- Special Construction staff or the contractor will be responsible for properly manifesting all impacted soils which leave the Site.
- Special Construction staff or the contractor will be responsible for taking the appropriate measures to ensure excavations are appropriately secured at the end of work each day.
- Work is anticipated to be completed in Level D. ProSource has prepared a site health and safety plan which the contractor's on-site personnel will be required to read and sign (copies will be provided prior to mobilization.) However, the contractor is ultimately responsible for maintaining safe operation of it personnel and equipment.
- All personnel working on-site must have 40-hour, as well as current 8-hour refresher HAZWOPER training. Special Construction staff or the contractor will be required to provide all supporting health and safety documentation for its on-site personnel to ProSource prior to mobilization

2.2.3 Confirmatory Sampling

The excavation of impacted soils will be conducted based on visual observations, to the extent possible. Soils will not be removed in the event that the integrity of an existing structure (i.e. sidewalk or street) is compromised. The excavation spoils, sidewalls, and base will be screened for organic vapors using a PID calibrated on a daily basis to an isobutylene standard. Calibration results will be entered on a calibration log.

Once it appears as though the visually impacted soil has been removed within the planned excavation areas (Figure 3), soil samples will be collected from the base and sidewalls of each excavation and analyzed for PCBs, VOCs and DRO to confirm that impacted soils have sufficiently been removed. An expedited turnaround time (24 hours) for samples will be requested, so a decision can quickly be made as to whether additional excavation is required or backfilling, compaction and grading can begin.

With the exception of DRO, analytical results will be compared to MPCA's Residential Soil Reference Values (SRVs). Since there is not an SRV for DRO, an action level of 50 parts-per-million will be used. Should any of the samples exceed their respective criteria, the suspect area will be further subdivided and re-sampled (at the previous sampling locations) to narrow down the

problem area. Only the parameter(s) which exceeded their criteria will be analyzed again. After the problem area has been identified (as confirmed by re-sampling), that portion of the excavation will be excavated and disposed. If the analytical results from re-sampling do not exceed the appropriate criteria, the material will be left in place.

Due to the expected shallow depth, samples will be collected from the excavation base rather than the sidewalls. Samples will preserved (as required) and placed into clean, laboratory supplied sample containers. Each sample container will be uniquely numbered and labeled using indelible ink. Additional information on the label will include the analytical parameter(s), preservative(s), sampling personnel, as well as the date and time of sample collection. The label will be directly affixed to the appropriate sample container. The samples will then be placed on ice and maintained at a temperature of 4° C. A chain-of-custody will be initiated and kept with the samples until custody was relinquished to the laboratory.

2.2.4 Backfill and Compaction

After confirmatory sampling has been completed (including analytical results), a post-excavation topographic survey will be conducted. This survey will include the vertical and horizontal limits of the excavation along with the PID and soil sampling locations. Following the survey, each excavation will be backfilled and compacted using the stockpiled overburden and/or clean fill from an off-site source. Backfill will be placed in two-foot lifts and compacted using the backhoe bucket. Once the final lift has been placed and compacted, interim grading of the area disturbed during demolition and excavation activities will be necessary to prevent ponding of surface water. Depending on the timing of redevelopment activities, seeding may be required in order to minimize runoff and/or erosion.

2.3 DRAP Implementation Report Preparation

Once all field work has been completed, ProSource will prepare a DRAP Implementation Report. This report will discuss the methods used during the field activities, present the results of the confirmatory sampling and provide an assessment of current site conditions. Documentation will include, but is not limited to field forms, photographs, analytical reports and manifests.

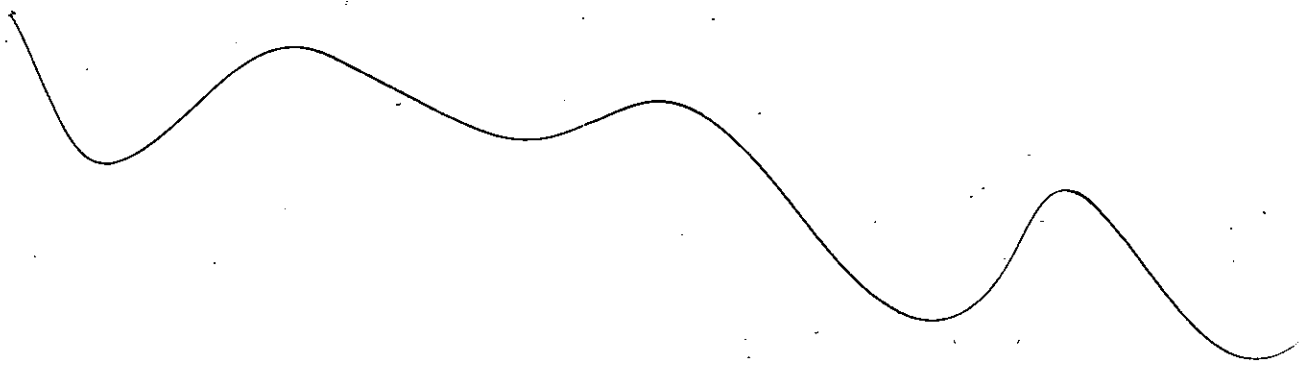
3.0 CERTIFICATION

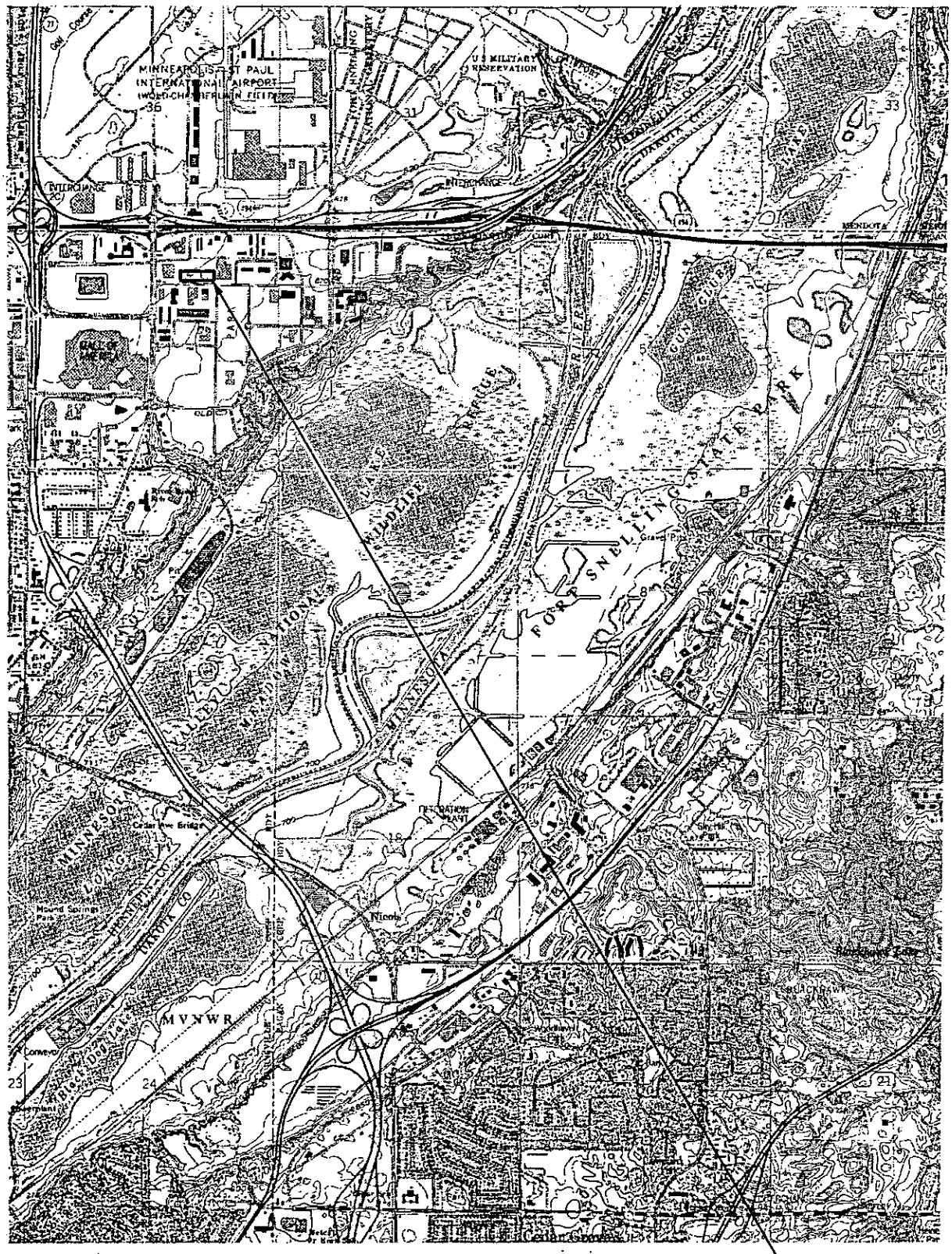
ProSource has prepared this Development Response Action Plan for the exclusive use of Xcel Energy and its agents, for specific application to the Bloomington Substation site located in Bloomington, Minnesota. The services performed by ProSource for this project have been conducted in a manner consistent with the level of skill and care ordinarily exercised by other members of the profession currently practicing in this area. No other warranty, expressed or implied, is made.

Name and Title:	Signature:	Date Signed:
David J. Hodek, P.E. – Staff Engineer		
Wade A. Carlson, P.G. - Principal		

Company Mailing Address: ProSource Technologies, Inc.
277 Coon Rapids Boulevard, Suite 304
Coon Rapids, Minnesota 55433
Phone: (763) 786-1445
Fax: (763) 786-1030

FIGURES



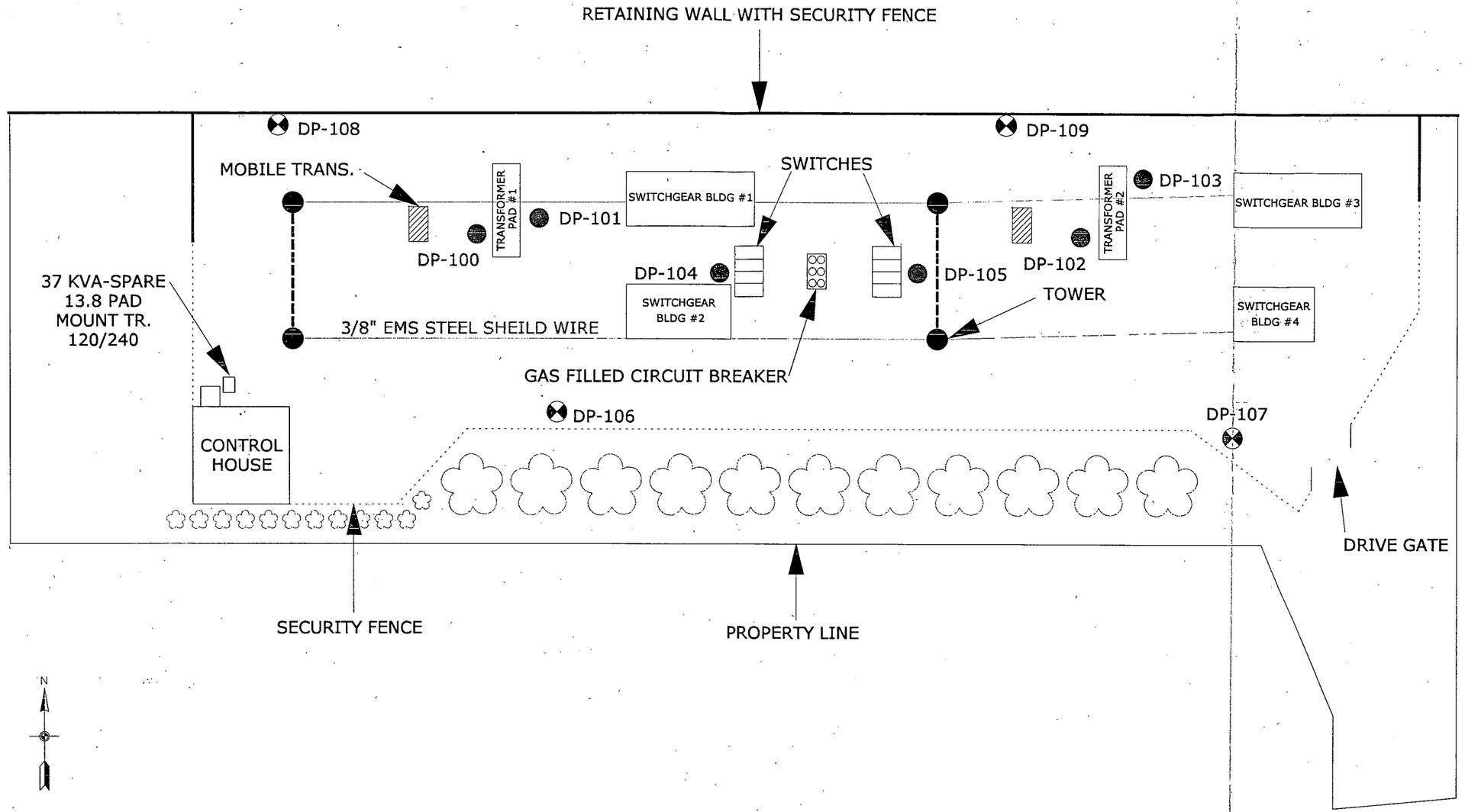


SOURCE: USGS ST. PAUL SOUTHWEST QUAD MAP

PHASE II ENVIRONMENTAL SITE ASSESSMENT
Xcel Energy
Bloomington Substation
2700 East 80th Street
Bloomington, Minnesota 55425
ProSource Project No.: 237-00

FIGURE 1
SITE LOCATION

ProSource TECHNOLOGIES, INC.



LEGEND

DP-108 DEEP DIRECT PUSH BORING

DP-100 SHALLOW DIRECT PUSH BORING

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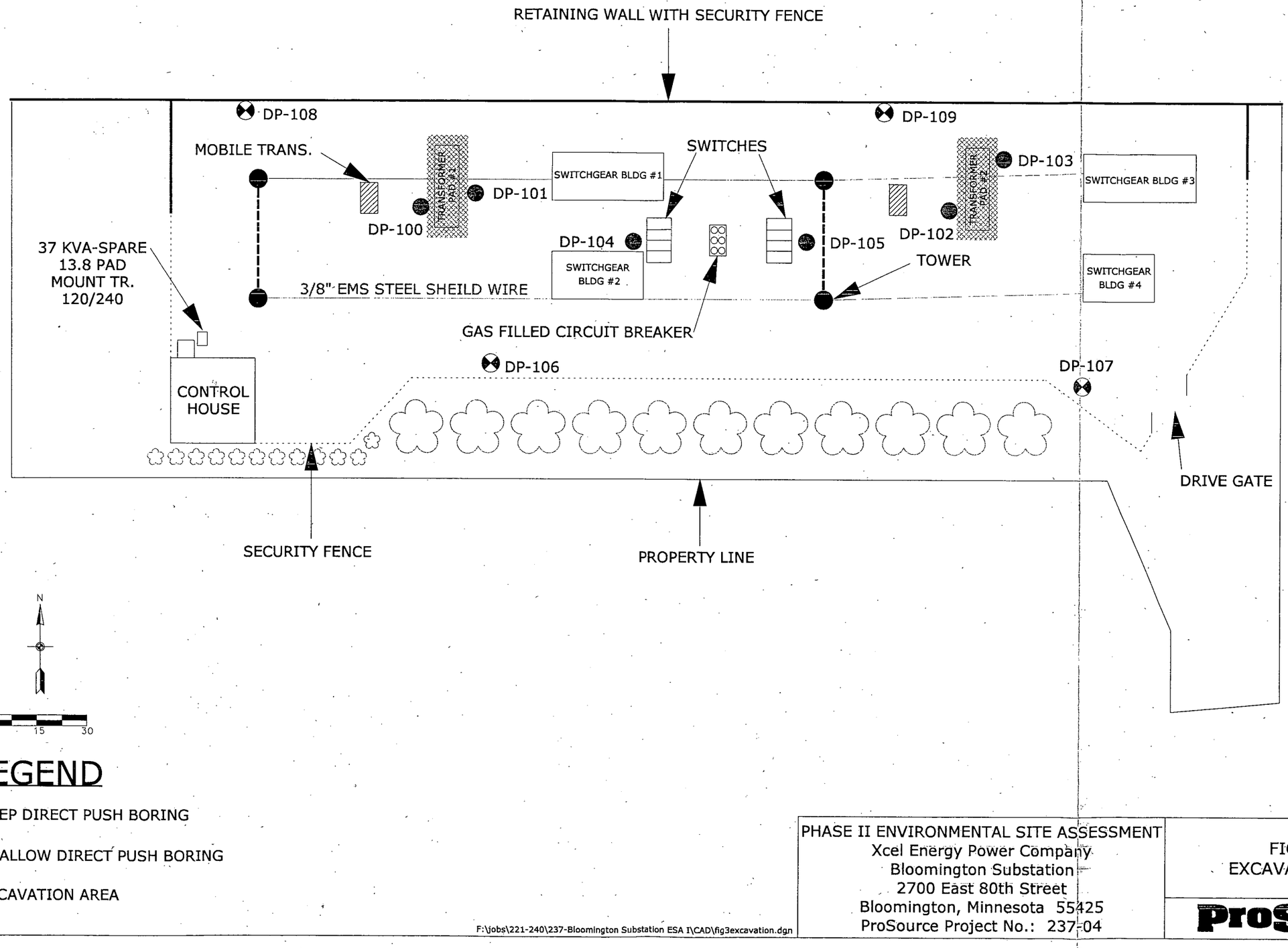
PHASE II ENVIRONMENTAL SITE ASSESSMENT
Xcel Energy Power Company
Bloomington Substation
2700 East 80th Street
Bloomington, Minnesota 55425
ProSource Project No.: 237-04

FIGURE 2
SITE MAP

ProSource TECHNOLOGIES, INC.



LEGEND

DP-108 DEEP DIRECT PUSH BORING

DP-100 SHALLOW DIRECT PUSH BORING

EXCAVATION AREA

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PHASE II ENVIRONMENTAL SITE ASSESSMENT
Xcel Energy Power Company
Bloomington Substation
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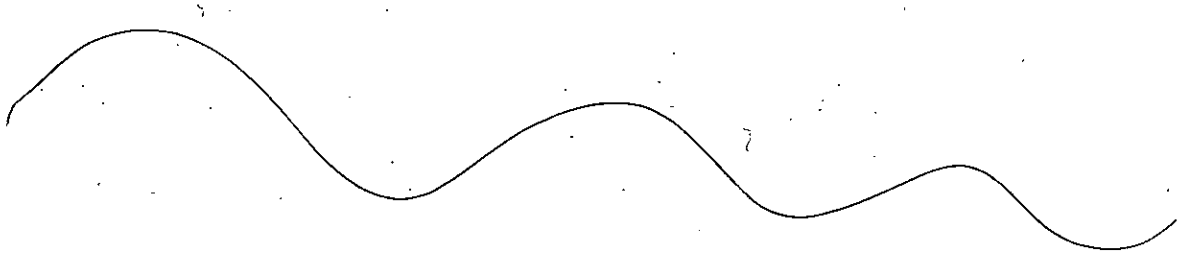
ProSource Project No.: 237-04

FIGURE 3
EXCAVATION AREA

ProSource TECHNOLOGIES, INC.

APPDENDICES



APPENDIX A
PCB ANALYSIS LABORATORY REPORT

Xcel Energy

Minneapolis Testing Laboratory Report
PCB Analysis - Special Projects Laboratory

Report Date: 12/18/2003

To: WOJCIAK J.

Date Recieved: 10/8/1991
Date Analyzed: 10/8/1991
Login Rec File:

TL 21610 2 ppm PCB in Oil
LabWorks ID: MZ19604 10/8/1991
Location: BLOOMINGTON 1TR

Serial #: 6996472
Make: WESTINGHO Equipment ID:
Gallons of Oil: 7660 Spill: Amount Spilled:
Additional Sample Info

TL 21614 9 ppm PCB in Oil
LabWorks ID: MZ19608 10/8/1991
Location: BLOOMINGTON 2TR

Serial #: 6996473
Make: WESTINGHO Equipment ID:
Gallons of Oil: 7660 Spill: Amount Spilled:
Additional Sample Info

TL 28470 2 ppm PCB in Oil
LabWorks ID: MZ25328 5/18/1993
Location: BLOOMINGTON

Serial #: 6996472
Make: WEST Equipment ID:
Gallons of Oil: 234 Spill: Amount Spilled:
Additional Sample Info
1 TR LTC

TL 28469 11 ppm PCB in Oil
LabWorks ID: MZ25329 5/18/1993
Location: BLOOMINGTON

Serial #: 6996473
Make: WEST Equipment ID:
Gallons of Oil: 234 Spill: Amount Spilled:
Additional Sample Info
2 TR LTC

MN Dept of Health-Certification-Lab# 027-053-197
Wisconsin/DNR Certification ID #999071150
Method ASTM D4059-86
Method EPA-600/4-81-045
Method EPA -8082
Method EPA -608

Analyzed By: QQQ
System Chemists: Lori Gleason (612) 630-4441
Robert Riesgraf (612) 630-4128

Xcel Energy

Minneapolis Testing Laboratory Report
PCB Analysis - Special Projects Laboratory

Report Date: 12/18/2003

To: NODES G.

Date Recieved: 6/8/2000
Date Analyzed: 6/8/2000
Login Rec File:

TL 49260 — 2 ppm — PCB in Oil
LabWorks ID: MZ47512 6/8/2000
Location: BLOOMINGTON

Serial #: 6996472
Make: WE Equipment ID:
Gallons of Oil: 181 Spill: Amount Spilled:
Additional Sample Info
1 TR SELECTOR SWITCH

TL 49261 — 9 ppm — PCB In Oil
LabWorks ID: MZ47524 6/8/2000
Location: BLOOMINGTON

Serial #: 6996473
Make: WE Equipment ID:
Gallons of Oil: 181 Spill: Amount Spilled:
Additional Sample Info
2 TR SELECTOR SWITCH

MN Dept of Health-Certification-Lab# 027-053-197
Wisconsin/DNR Certification ID #999071150
Method ASTM D4059-86
Method EPA-600/4-81-045
Method EPA -8082
Method EPA -608

Analyzed By: QQQ
System Chemists: Lori Gleason (612) 630-4441
Robert Riesgraf (612) 630-4128

APPENDIX B
SITE HEALTH AND SAFETY PLAN

Site Health & Safety Plan

Prepared by:
ProSource Technologies, Inc.

Project Name/No.:	Phase II Site Investigation Xcel Energy Bloomington Substation ProSource Project No. 237-00
Site Location:	The Site is located at 2700 East 80th St. in Bloomington, Minnesota.
Project Manager:	Dave Hodek
Xcel Energy Contacts:	Al Peterson
Phone:	(612) 330-6493
	ProSource Technologies, Inc.
Phone:	(763) 786-1445
Cell Phone:	(763) 458-8426

PLANNED SITE ACTIVITIES:

Work at the Site will consist of the following:

- Drilling and continuously sampling 10 test holes to evaluate site geologic/hydrogeologic conditions, as well as obtain soil and/or ground water samples for chemical analysis. These test holes will be advanced using direct push technology (Geoprobe™).
- Collecting soil and/or ground water samples from selected soil test holes and submitting them to a Minnesota Department of Health (MDH) certified laboratory for chemical analysis. Laboratory analysis will include polychlorinated biphenyl (PCB), diesel range organics (DRO), gasoline range organics (GRO), and volatile organic compounds (VOCs).
- Surveying test holes to establish vertical and horizontal control for each point.

MEDICAL EMERGENCY ROUTE:

Hospital:	Healthsouth	**Phone Number:**	(952) 832-9360
Hospital Address:	7373 France Ave. South Bloomington, MN 55435		

Directions to Hospital:

From the Site, travel west on East 80th Street for approximately 0.2 miles. Turn right on 24th Ave South, then left onto the entrance ramp to I-494 West. Continue on I-494 West for 4.1 miles to the France Avenue exit (Exit 6B). Turn right (north) on France Avenue. The hospital is approximately 0.8 miles north of I-494 on France Avenue and is located at 7373 France Avenue South.

Distance and driving time to hospital: Approximately 5.5 miles
Approximately 8 minutes

NOTE: Map of hospital route is attached.

LOCAL EMERGENCY TELEPHONE NUMBERS:

Ambulance	911
Hospital Emergency Room	911
Poison Control Center	911
Fire Department	911
Police Department	911
Hazardous Materials Response Unit	911

EMERGENCY PHONE NUMBERS:

ProSource Minneapolis (Coon Rapids) Office	(763) 786-1445
ProSource Toll-Free	(888) 422-4449
ProSource Project Manager- Dave Hodek - Cell:	(763) 458-3635
ProSource Alternative – Wade Carlson - Cell	(763) 458-8426
CHEMTREC Command Center	(800) 424-9300
Regulatory Agency: MPCA St. Paul (day)	(651) 296-6300
Regulatory Agency: OSHA (day)	(800) 582-1708
Centers for Disease Control	(404) 633-5313

RESOURCES AVAILABLE ON-SITE:

Telephone	Yes___	No _X
Cell Phone	Yes_X	No ___
Water Supply	Yes___	No _X
Medical Equipment	Yes___	No _X
Fire Equipment	Yes___	No _X
Hazmat Spill Equipment	Yes___	No _X
First Aid Kit	Yes_X	No ___

SITE HISTORICAL INFORMATION:

The Site was developed from farmland by the McCarthy Well Company from in the mid-1960's and owned until 1986. In 1986, Xcel Energy acquired the Site by eminent domain in order to build an electrical substation to provide electrical service to the nearby Mall of America. The construction of the existing electrical substation was completed in 1987.

A Phase I ESA was conducted at the Site in June 2000 by ProSource. The Phase I ESA identified the areas surrounding two large transformers at the east and west sides of the Site as potential areas of concern. Absorbent materials were observed on the concrete pads below the transformers and evidence of permanent staining of the concrete pads was also observed. To further define the extent of these impacts, a Phase II ESA was proposed.

POTENTIAL HAZARDS:

Volatile Organics	Yes_X	No ___	Unk___

Metals	Yes X	No ___	Unk___
Asbestos	Yes___	No X	Unk___
Petroleum Product	Yes X	No ___	Unk___
Buried Drums	Yes___	No ___	Unk X
Fire/Explosion	Yes___	No ___	Unk X
Radiation	Yes___	No X	Unk___
Noise	Yes X	No ___	Unk___
Fall & Slip	Yes X	No ___	Unk___
Construction Equipment	Yes X	No ___	Unk___
Biological Hazards	Yes___	No X	Unk___
Heat Stress	Yes X	No ___	Unk___
Cold Stress	Yes___	No X	Unk___
Confined Spaces	Yes___	No X	Unk___
Engulfment Hazards	Yes___	No X	Unk___
Utilities	Yes X	No ___	Unk___

REQUIRED HEALTH & SAFETY EQUIPMENT

First Aid Kit		Yes X	No ___
Hard Hat		Yes X	No ___
Safety Glasses		Yes X	No ___
Hearing Protection		Yes X	No ___
Safety Boots		Yes X	No ___
Protective Gloves		Yes X	No ___
Protective Suits		Yes___	No X
Respirator:	½ Mask	Yes___	No X
	Full Face	Yes___	No X
	PAPR	Yes___	No X
	SCBA	Yes___	No X

REQUIRED SITE MONITORING EQUIPMENT:

			Notes:
PID/FID	Yes X	No ___	Headspace Monitoring/-
Oxygen Detector/			Air Monitoring
CGI	Yes___	No X	Air Monitoring
Organic Vapor Analyzer	Yes___	No X	
Detector Tubes	Yes___	No X	

ACTION LEVELS:

Instrumentation will include a photoionization detector (PID) to monitor for the presence of VOC vapors. The action levels will apply to work outlined in this HASP. Action levels for direct-reading instruments in the workers general breathing zone are as follows:

Instrument	Action Level	Level of Respiratory Protection/Action
Photoionization Detector (PID)	Continuous readings to 1 ppm	Level D

	above background in breathing zone	
	Continuous readings of 1 ppm to 5 ppm above background in breathing zone	Level C (based on identification of contaminant)
	Continuous readings of 5 ppm to 250 ppm above background in breathing zone	Level B (only if contaminant identified is not suitable for Level C)

OTHER:

Push probe (Geoprobe) rig will be steam cleaned prior to mobilization. Decontamination of sampling equipment while drilling will consist of an Alconox® (or equivalent) wash, followed by a tap water/deionized water rinse.

SITE HEALTH & SAFETY PLAN (HASP) REVIEW IS REQUIRED BY ALL ON-SITE PERSONNEL BEFORE BEGINNING WORK

Printed Name	Initials	Date
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

NOTE: All field personnel must have completed OSHA 40 Hour HAZWOPER TRAINING (CFR 1910.120), have attended an 8-hour refresher course within the past year, and have an updated medical exam before beginning any site work.

Plan Prepared By: Dave Hodek Date: June 10, 2004
Signature: _____