



Minnesota Pollution Control Agency

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December 2, 2014

Mr. Joe Otte
Wenck Associates, Inc.
1802 Wooddale Drive, Suite 100
St. Paul, MN 55125

Mr. Mark Ryan
Carl Bolander & Sons Company
251 Starkey Street
St. Paul, MN 55107

RE: Approval of Work Plan–Plexus Section 4008 (Building 502/Site I)
TCAAP Redevelopment #2 Site, 2020 Highway Avenue, Arden Hills
MPCA VIC Project ID: VP22891

Dear Mr. Otte and Mr. Ryan:

The Minnesota Pollution Control Agency (MPCA) Brownfields staff in the Voluntary Investigation and Cleanup (VIC) Program have reviewed the “Additional Investigation Work Plan, Site I – Building 502”(Work Plan) dated October 1, 2014, submitted for the TCAAP Redevelopment #2 Site, located at the address referenced above (the Site). The Work Plan was prepared and submitted by Wenck Associates, Inc. (Wenck) and is specific to the investigation of soil impacted by volatile organic compounds (VOCs) within Plexus Section 4008, which is a subset of the larger Twin City Army Ammunition Plant (TCAAP) redevelopment property.

To support a lifting of existing land use restrictions at the Site, soil samples collected during investigation activities and response actions must be collected and analyzed in accordance with the October 15, 2013, Quality Assurance Project Plan–Revision 1 (QAPP), which was approved by the MPCA and the U.S. Environmental Protection Agency (EPA) on October 18, 2013. A QAPP Addendum Number 1 (QAPP Addendum) was submitted to the MPCA and EPA on June 10, 2014. The QAPP Addendum, which addressed cyanide sampling and included a modification to the evaluation of the incremental sampling replicates, was approved by the MPCA and EPA on July 7, 2014.

The Work Plan proposes additional soil samples for VOC analyses from 42 grab-sample locations and 46 soil borings. The purpose of the soil samples is to further evaluate slab penetrations (floor drains, sumps, and pits) and other potential source areas within Section 4008. The proposed field work supplements a large number of soil samples previously collected under the regulatory oversight of EPA/MPCA Superfund programs. The Work Plan is hereby approved, subject to the following conditions:

1. Section 4.2: The risk-screening criteria described in the first paragraph references residential soil reference values but not soil leaching values (SLVs). Because chlorinated VOCs are the primary contaminants of concern being addressed by the Work Plan, the pending RAP should be designed with Screening or Site-Adjusted SLVs in mind.
2. Include a comprehensive VOC data table and figure in the pending additional investigation report, inclusive of all VOC data that has been collected in Section 4008.

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3. On the Site figure(s) in the pending report, please show and label all potential sources of contamination. In addition to the features currently shown on Figure 3-1, identify the former location of the 28,000-gallon trichloroethylene (TCE) above-ground storage tank, the floor trenches that contained TCE distribution piping, and any other pertinent features.
4. For any soil samples collected from a former manufacturing area that shows field signs of contamination, include cyanide in the list of analytes.

Please note that assurances specifically from the VIC Program, which is governed by Minnesota's Environmental Response and Liability Act (Minn. Stat. § 115B), will not include petroleum-related contaminants in the identified release. Furthermore, petroleum-related contaminants are not being overseen by the MPCA or EPA Superfund Programs, as petroleum contaminants are excluded from their statutes. Please follow MPCA Petroleum Remediation Program guidance and the approved Construction Compliance Plan for any petroleum contamination encountered during Site assessment activities.

This letter is subject to the disclaimers found in Attachment A. If you have any questions about this letter, please contact Shanna Schmitt, VIC Project Manager, at 651-757-2697 or at shanna.schmitt@state.mn.us or Amy Hadiaris, Hydrogeologist, at 651-757-2402 or at amy.hadiaris@state.mn.us. Questions about petroleum-impacted soil at the Site can be directed to Mark Koplitz, Petroleum Brownfields Project Manager, at 651-757-2502 or at mark.koplitz@state.mn.us.

Sincerely,



for
Shanna Schmitt, P.G.
Project Manager/Hydrogeologist
Site Remediation and Redevelopment Section
Remediation Division

SS:mcb

Attachment

cc: Mark Koplitz, MPCA
Heather Worthington, Ramsey County
Beth Engum, Ramsey County Public Works
Patrick Klaers, Arden Hills City Administrator
Larry Carlson, Ramsey County Environmental Health Section
Rick Kubler, Gray Plant Mooty
Thad Lightfoot, Dorsey & Whitney

ATTACHMENT A
DISCLAIMERS
TCAAP REDEVELOPMENT #2 SITE
MPCA VIC PROJECT ID#: VP22891

1. Reservation of Authorities

The MPCA Commissioner reserves the authority to take any appropriate actions with respect to any release, threatened release, or other conditions at the Site. The MPCA Commissioner also reserves the authority to take such actions if the voluntary party does not proceed in the manner described in this letter or if actions taken or omitted by the voluntary party with respect to the Site contribute to any release or threatened release, or create an imminent and substantial danger to public health and welfare.

2. No MPCA Assumption of Liability

The MPCA, its Commissioner and staff do not assume any liability for any release, threatened release or other conditions at the Site or for any actions taken or omitted by the voluntary party with regard to the release, threatened release, or other conditions at the Site, whether the actions taken or omitted are in accordance with this letter or otherwise.

3. Letter Based on Current Information

All statements, conclusions and representations in this letter are based upon information known to the MPCA Commissioner and staff at the time this letter was issued. The MPCA Commissioner and staff reserve the authority to modify or rescind any such statement, conclusion or representation and to take any appropriate action under his authority if the MPCA Commissioner or staff acquires information after issuance of this letter that provides a basis for such modification or action.

4. Disclaimer Regarding Use or Development of the Property

The MPCA, its Commissioner and staff do not warrant that the Site is suitable or appropriate for any particular use.

5. Disclaimer Regarding Investigative or Response Action at the Property

Nothing in this letter is intended to authorize any response action under Minn. Stat. § 115B.17, subd. 12.