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February 11, 2013

Ms. Shanna Schmitt, Project Manager
Minnesota Pollution Control Agency
VIC Program
520 Lafayette Road
St. Paul, Minnesota 55155-4194

Ms. Amy Hadiaris, Technical Analyst
Minnesota Pollution Control Agency
VIC Program
520 Lafayette Road
St. Paul, Minnesota 55155-4194

RE: Project Name: TCAAP Redevelopment #2
MPCA ID ##: PB4302 & VP22891
Wenck Proj. #: 0979-02

Dear Ms. Schmitt and Ms. Hadiaris:

The purpose of this letter is to provide you with the necessary information regarding the proposed actions for which the intended protected parties are seeking regulatory relief under the Minnesota Environmental Response and Liability Act (MERLA), Minn. Stat. § 115B.01, *et. seq.* Specifically, we request that the Minnesota Pollution Control Agency (MPCA) Voluntary Investigation and Cleanup (VIC) Program issue a No Association Determination (NAD) under Minn. Stat. § 115B.178, subd. 1(a) for Ramsey County (County) relative to the identified release of hazardous substances at the property located at 2020 Highway Avenue, Arden Hills, Minnesota, in Ramsey County (Site). We are also requesting that the MPCA issue a Contractors' Liability Protection Letter pursuant to Minn. Stat. § 115B.03, subd. 10 for the County, Carl Bolander & Sons Co. and Wenck Associates, Inc. (Wenck) with respect to hazardous material abatement, demolition and response actions to be completed at the Site.

Background

The Site, which consists of approximately 427 acres of the former Twin Cities Army Ammunition Plant (TCAAP), is currently owned by the United States Army (Army). The Site is located in portions of Section 9 and 16, Township 30 North, Range 23 West. A figure showing the Site boundaries is attached as Exhibit 1.

Ramsey County has entered into an Offer to Purchase the Site from the Army. An initial conveyance by the Army to the County of 397 acres of the Site is anticipated in late March/early April, 2013. The County will lease the remaining 30 acres of the Site (Leased Property) from the Army while the County completes, on behalf of the Army, remediation of releases of hazardous substances in satisfaction of the Army's obligations under the Federal Facilities Agreement (Army, MPCA, U.S. EPA, 1987). The Army has recognized that in completing response actions on the Leased Property, the County and its contractors are performing the function of being the Army's response action contractor, as is set forth in the Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9619(a). *See also* MERLA, Minn. Stat. § 115B.03, subd. 10(a). The County will take title to the Leased Property once the remediation is complete.

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The County has entered into an Agreement with Bolander to complete hazardous material abatement, demolition of Site improvements, and remediation of releases of hazardous substances and petroleum to the soil at the Site. Bolander has subcontracted with Wenck to provide environmental consulting and engineering services for the project.

Once the Site remediation is complete, the County will request that the MPCA issue a Commissioner's Certificate of Completion pursuant to Minn. Stat. § 115B.175. The County will also request amendment of the Operable Unit 2 (OU2) Land Use Control Remedial Design (Wenck, June 2011, Rev. 2) (LUCRD) and associated environmental covenants to allow residential use throughout the Site.

Identified Release

The identified release at the Site includes all hazardous substances identified and described in the MPCA's file, including, without limitation, heavy metals (*e.g.*, antimony, arsenic, copper, chromium, manganese, mercury, lead, thallium and vanadium), polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs), primarily trichloroethene (TCE) and its degradation products (collectively, the Identified Release). The Identified Release includes all impacts to soil, groundwater and any other affected media at the Site.

Proposed Actions

We request that the MPCA issue a NAD to the County with respect to the Identified Release for the following proposed actions:

- Acquisition by the County from the Army of the FOST Property, on which past testing has identified releases of petroleum products and hazardous substances.
- Lease by the County from the Army of the Leased Property on which past testing has identified releases of petroleum products and hazardous substances.
- Hazardous materials abatement, demolition and processing of all above- and below-grade improvements on the Site, which are not part of the groundwater treatment system owned and operated by the Army.
- Environmental investigation of the Site pursuant to a Field Sampling Plan and Quality Assurance Project Plan, which have been approved by the MPCA and the U.S. EPA, and are designed to generate sufficient information to support issuance by MPCA of a Certificate of Completion after implementation of an MPCA-approved Response Action Plan (RAP) or RAPs to allow residential and other, similar unrestricted uses throughout the Site.

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- Complete response actions pursuant to the MPCA approved RAP(s) to support issuance by MPCA of a Certificate of Completion for the Site and modification by the Army, with concurrence of the MPCA and the EPA, of the LUCRD and associated environmental covenants to allow residential and other, similar unrestricted uses of the Site.
- All other actions of County and its contractors and subcontractors associated with acquiring, maintaining, and preparing the Site for sale and redevelopment consistent with the Master Plan to be approved by the County and City of Arden Hills, including without limitation construction, installation and/or relocation of roads, utilities, sewers, water lines and other infrastructure.

In addition, we request that the MPCA issue a Contractors' Liability Protection Letter for the County, Carl Bolander & Sons Co. (Bolander) and Wenck Associates, Inc. (Wenck), with respect to the hazardous materials abatement, demolition, environmental investigation, remediation and other actions to be undertaken at the Site pursuant to Bolander's Agreement with the County, and the Lease between the Army and the County, as described above.

If there are any questions concerning this request, please contact me at (651) 294-4587.

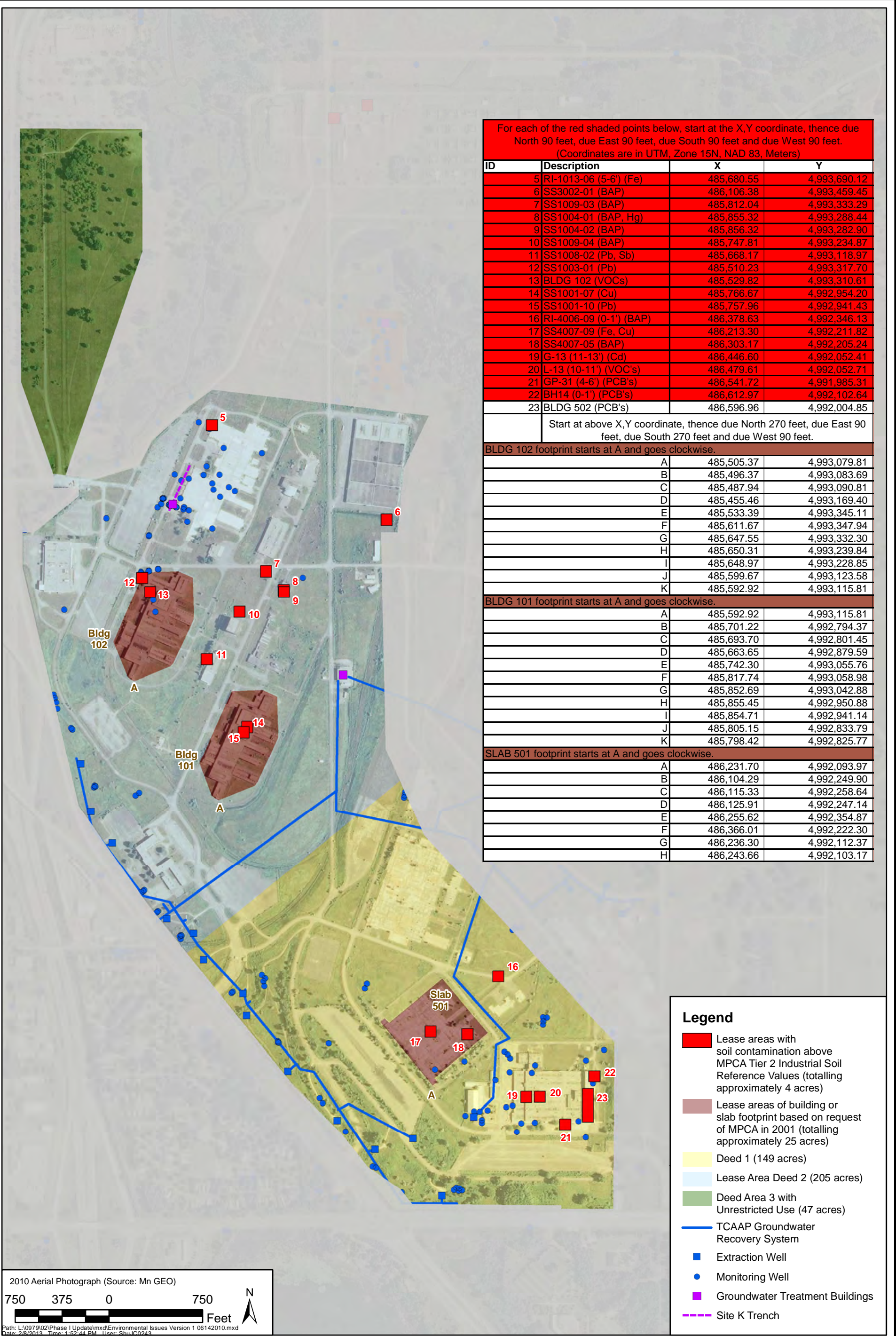
Sincerely,

WENCK ASSOCIATES, INC.



J. Joseph Otte, Principal

C: Ms. Heather Worthington, Ramsey County
Mr. Paul Zisla, Ramsey County Attorney's Office
Mr. Mark Ryan, Bolander & Sons Co.
Mr. Rick Kubler, Gray Plant Mooty



For each of the red shaded points below, start at the X,Y coordinate, thence due North 90 feet, due East 90 feet, due South 90 feet and due West 90 feet.
(Coordinates are in UTM, Zone 15N, NAD 83, Meters)

ID	Description	X	Y
5	RI-1013-06 (5-6') (Fe)	485,680.55	4,993,690.12
6	SS3002-01 (BAP)	486,106.38	4,993,459.45
7	SS1009-03 (BAP)	485,812.04	4,993,333.29
8	SS1004-01 (BAP, Hg)	485,855.32	4,993,288.44
9	SS1004-02 (BAP)	485,856.32	4,993,282.90
10	SS1009-04 (BAP)	485,747.81	4,993,234.87
11	SS1008-02 (Pb, Sb)	485,668.17	4,993,118.97
12	SS1003-01 (Pb)	485,510.23	4,993,317.70
13	BLDG 102 (VOCs)	485,529.82	4,993,310.61
14	SS1001-07 (Cu)	485,766.67	4,992,954.20
15	SS1001-10 (Pb)	485,757.96	4,992,941.43
16	RI-4006-09 (0-1') (BAP)	486,378.63	4,992,346.13
17	SS4007-09 (Fe, Cu)	486,213.30	4,992,211.82
18	SS4007-05 (BAP)	486,303.17	4,992,205.24
19	G-13 (11-13') (Cd)	486,446.60	4,992,052.41
20	L-13 (10-11') (VOC's)	486,479.61	4,992,052.71
21	GP-31 (4-6') (PCB's)	486,541.72	4,991,985.31
22	BH14 (0-1') (PCB's)	486,612.97	4,992,102.64
23	BLDG 502 (PCB's)	486,596.96	4,992,004.85

Start at above X,Y coordinate, thence due North 270 feet, due East 90 feet, due South 270 feet and due West 90 feet.

BLDG 102 footprint starts at A and goes clockwise.

A	485,505.37	4,993,079.81
B	485,496.37	4,993,083.69
C	485,487.94	4,993,090.81
D	485,455.46	4,993,169.40
E	485,533.39	4,993,345.11
F	485,611.67	4,993,347.94
G	485,647.55	4,993,332.30
H	485,650.31	4,993,239.84
I	485,648.97	4,993,228.85
J	485,599.67	4,993,123.58
K	485,592.92	4,993,115.81

BLDG 101 footprint starts at A and goes clockwise.

A	485,592.92	4,993,115.81
B	485,701.22	4,992,794.37
C	485,693.70	4,992,801.45
D	485,663.65	4,992,879.59
E	485,742.30	4,993,055.76
F	485,817.74	4,993,058.98
G	485,852.69	4,993,042.88
H	485,855.45	4,992,950.88
I	485,854.71	4,992,941.14
J	485,805.15	4,992,833.79
K	485,798.42	4,992,825.77

SLAB 501 footprint starts at A and goes clockwise.

A	486,231.70	4,992,093.97
B	486,104.29	4,992,249.90
C	486,115.33	4,992,258.64
D	486,125.91	4,992,247.14
E	486,255.62	4,992,354.87
F	486,366.01	4,992,222.30
G	486,236.30	4,992,112.37
H	486,243.66	4,992,103.17

- Legend**
- Lease areas with soil contamination above MPCA Tier 2 Industrial Soil Reference Values (totalling approximately 4 acres)
 - Lease areas of building or slab footprint based on request of MPCA in 2001 (totalling approximately 25 acres)
 - Deed 1 (149 acres)
 - Lease Area Deed 2 (205 acres)
 - Deed Area 3 with Unrestricted Use (47 acres)
 - TCAAP Groundwater Recovery System
 - Extraction Well
 - Monitoring Well
 - Groundwater Treatment Buildings
 - Site K Trench

2010 Aerial Photograph (Source: Mn GEO)
 750 375 0 750 Feet
 Path: L:\0979\02\Phase I Update\mxd\Environmental Issues Version 1 06142010.mxd
 Date: 2/8/2013 Time: 1:52:44 PM User: Stu.F0243