

From: Hadiaris, Amy (MPCA) [<mailto:amy.hadiaris@state.mn.us>]
Sent: Thursday, December 29, 2016 4:53 PM
To: Oesterreich, Ryan; Ziska, Jim
Cc: Pinter, Chuck (C.H.); Schmitt, Shanna (MPCA); VanPatten, Stacey (MPCA); Oulgout, Bassou (MPCA) ; Clapp-Smith, Merritt (CI-StPaul)
Subject: Approval of RAP for Consolidated Impact Areas

Greetings,

MPCA staff in the Voluntary Investigation and Cleanup (VIC) and Petroleum Brownfields (PB) programs has completed review of the *Interim Response Action for Consolidated Impact Areas* (RAP). The RAP, dated October 7, 2016, addresses three large areas of contaminated soil at the site:

- North parking lot (primarily petroleum-related impacts);
- Former waste disposal areas A and B, in the south part of the site (on-site impacts only). Off-site impacts on CP Rail property will be addressed in a future response action plan; and
- Central area within and just east of the footprint of the former main assembly building.

An Addendum to this RAP is pending. The Addendum will propose response actions for elevated arsenic concentrations in soil, as discussed in previous email correspondence between MPCA, Arcadis, and Ford.

This RAP supplements soil response actions already completed or in process, in accordance with other previously approved response action plans (e.g. various *Site Decommissioning Response Action Plan Addendums* and the *Isolated Impact Area Response Action Plan*).

The RAP is approved, subject to the following qualifications and/or modifications:

Section 2

"The objective of the remedial actions proposed is to excavate and dispose of all soils exceeding Minnesota Pollution Control Agency (MPCA) Tier I Soil Reference Values (SRVs) and Petroleum Brownfields Program guidance values for DRO/GRO to levels below residential criteria."

Additional excavation over-and-above the MPCA's SRVs may be applicable in VOC-impacted areas. If VOC-impacted soil remains in the bottom or sidewalls of an excavation, please contact VIC staff to discuss whether additional excavation is needed. Because the SRVs for VOCs are quite high, relying on SRVs as cleanup criteria may leave too much residual contamination in place with respect to potential exposure pathways unrelated to SRVs. The need for additional excavation will be based on the magnitude and extent of residual VOC contamination, the depth of the excavation, groundwater impacts, and other situation-specific considerations.

Section 4.0

"Confirmation samples will be taken from soil left in place. In the event that final excavation limits reach bedrock, base confirmation soil samples will not be collected." Sidewall confirmation samples are still necessary. Section 4.2 does contain the correct language.

Section 4.1

As a clarifying comment, all impacted soil identified in the RAP will be sent to a landfill for disposal. It will be temporarily stockpiled on site in a staging area and sampled to meet the landfill's intake

requirements, as described in Section 4.4. That soil has already been identified as impacted; the fate of that soil (stay or go) is not dependent on field screening or additional sampling results.

Section 4.2

As a convenience for the future owner/developer of the site, MPCA staff suggests including SLVs (for VOCs only) in the confirmation sample data summary table(s), in addition to SRVs and PBP guidance values. The SLVs do not serve as default soil cleanup criteria for this site, for reasons addressed in previous correspondence, and a confirmation soil sample with a VOC concentration greater than its SLV does not, in and of itself, indicate a potential risk to groundwater via soil leaching.

Section 4.8.2

If any drums or tanks are discovered during excavation activities, please contact MPCA staff upon discovery.

Table 1 (errata)

This table identifies the specific SDRAP Addendums to be addressed during implementation of this Consolidated Area RAP. It's my understanding that the releases described in the following SDRAP Addendums have already been taken care of, based on information provided in the respective SDRAP Addendums; however, these SDRAP Addendums are listed in Table 1. Please clarify via email response the status of these areas:

- *SDRAP Addendum #6:* Impacted soil was contained within a concrete elevator shaft pit; all impacted soil was reportedly removed during feature removal – no additional action was proposed.
- *SDRAP Addendum #7:* Impacted soil was contained within a concrete structure; all impacted soil was reportedly removed during feature removal – no additional action was proposed.
- *SDRAP Addendum #22:* Impacted soil associated with this area (MAB inner foundation footing) was reportedly removed during feature removal. Based on field observations and previous confirmation sample results (MAB-P18-BASE), SDRAP Addendum #22 did not propose additional action.
- *SDRAP Addendum # 37:* Implementation of this SDRAP Addendum was not previously deferred; has any remedial action in this area already been completed?

Table 2 (errata)

On page 2/5, the first sample attributed to SDRAP 28 (MAB-P18-BASE) should, I believe, be associated with SDRAP 48. (The data was previously reported in SDRAP 48).

General

As with other work plans and RAPs, please follow Petroleum Remediation Program guidance documents in areas with petroleum impacts, and give Stacey or Bassou a call if any petroleum-related questions arise.

Amy K. Hadiaris, P.G.
Voluntary Investigation and Cleanup Program
Remediation Division
Minnesota Pollution Control Agency
651.757.2402
amy.hadiaris@state.mn.us