

September 12, 2007

Douglas Wetzstein  
Superfund and Emergency Response Section, Remediation Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, MN 55155

RE: Highway 96 Dump Superfund Site – Comments on CRA Feasibility Study

Dear Douglas:

The City Council of the City of North Oaks (City), along with our City Engineer Jeff Roos and Consulting Environmental Engineer John Erdmann, Wenck Associates, received copies from Conestoga-Rovers and Associates, the consulting engineering firm completing the feasibility study on behalf of the Responsible Parties (RPs). I am sending you copies of their letter reports to us that have also been sent to Ron Frehner, CRA. We trust that you will find their review comments and suggestions critical to any final decisions the Minnesota Pollution Control Agency (MPCA) may make about submitting an amendment to the 1993 Minnesota Decision Document (MDD).

We also request that your staff and you communicate with us should you encounter any questions about the current situation in our community and the prospective remedies the MPCA may be considering. That request is especially important to the extent that the MPCA either has questions about the suggestions of our engineering firms or is considering details for a possible proposed amendment that we have not discussed before now.

In the meantime, if you have questions or find a need to contact us, please know that we will welcome your communication. Thank you.

Sincerely and respectfully  
on behalf of the City Council of the City of North Oaks,

Thomas N. Watson  
Mayor

cc: Council members, City of North Oaks  
Jeffrey Roos, City Engineer  
John Erdmann, Wenck Associates  
Thomas Newcome III, City Attorney  
Ron Frehner, CRA  
North Oaks Home Owners' Association Board of Directors  
Senator Sandy Rummel  
Representative Paul Gardner  
Representative Carol McFarlane

Enclosure – Wenck Associates, Inc. letter to Mayor Watson dated August 28, 2007  
Jeffrey J. Roos, MFRA, letter to Ron Frehner dated August 14, 2007

July 13, 2020

The Honorable Thomas N. Watson  
Mayor of the City of North Oaks  
100 Village Center Drive, Suite 150  
North Oaks, MN 55127

Re: Highway 96 Site groundwater impacts – Feasibility Study by CRA, July 2007

Dear Mr. Watson:

This letter follows up on the telephone discussion you and I had on August 15 and on Wenck Associates' review of the report, "Feasibility Study, VOCs in Groundwater – West of Gilfillan Lake, North Oaks, Minnesota, Highway 96 Site, White Bear Township, Minnesota," July 2007, prepared by Conestoga-Rovers & Associates (CRA) on behalf of Whirlpool Corporation and Reynolds Metals Company.

The following correspondence relating to the feasibility study is noteworthy:

- In a letter to you dated April 6, 2007, the Minnesota Pollution Control Agency afforded the City of North Oaks an opportunity to comment on the MPCA's list of remedial alternatives to be addressed in the feasibility study before the MPCA initiated the study itself.
- At the City's request, Wenck reviewed the MPCA's letter and list of remedial alternatives, and provided comments in a letter to you dated April 27, 2007.
- The City responded to the MPCA in a letter from you dated May 10, 2007, which incorporated Wenck's April 27 letter to you as an attachment.
- In a letter dated June 7, 2007 to the responsible parties' respective counsels, the MPCA requested Whirlpool and Reynolds to conduct the feasibility study.
- In a letter to you dated June 11, 2007, the MPCA acknowledged and partly responded to the City's and Wenck's comments.

The feasibility study and the MPCA's letters of June 7 and June 11 answer the majority of the City's and Wenck's stated concerns. However, the following issues remain to be fully addressed:

*Issues raised in Wenck's April 27 letter:*

- **Inclusion of the pump-and-treat alternative in scenario B as well as (or in place of) scenario A.** Scenario B is the situation in which the Minnesota Department of Health issues one or more well advisories in the area west of Gilfillan Lake because of Health Risk Limit exceedences for vinyl chloride or other Site-related volatile organic compound(s). In scenario A, there is no well advisory in the area and no Health Risk Limit exceedences for Site-related compounds. The MPCA's June 7 letter initiating the feasibility study retained the pump-and-treat alternative in scenario A only, and the feasibility study follows the MPCA's directive.
- **Explanation of what would trigger the choice of municipal water as the preferred and recommended remedial alternative (in scenario B).** The feasibility study nicely lays out sub-alternatives for providing municipal water to three, 33, or 82 homes (and similar sub-alternatives for providing either deeper wells or granular activated carbon [GAC] treatment for impacted residential wells), but the basis for choosing which of these sub-alternatives, if any, as the preferred and recommended remedy has not yet been articulated.
- **Contingency for the appearance in the groundwater of a Site-related compound that is not adequately treatable by GAC.** Although seemingly remote, this possibility has not been acknowledged by the MPCA or CRA.
- **Contingency for continuous operation of an expanded well field by the St. Paul Regional Water Services.** The MPCA acknowledged this issue in its June 11 letter to the City but stated that it is beyond the scope of the remedy selection process.

*Issues raised in the City's May 10 letter:*

- **Explanation of the need to amend the original Minnesota Decision Document (MDD).** This is a question for the MPCA, and it remains unanswered.
- **Clarification of the following terms used in the original MDD: "Site," "area of the Site," and "entire affected area."** The MDD sometimes uses the phrase "area of the Site" in reference to "a residential area in the City of North Oaks" where groundwater contamination "has affected the drinking water." Figure 1 in the MDD, a map that encompasses areas both east and west of Lake Gilfillan, is referenced in the MDD as an illustration of the "entire affected area." Clarification of these usages relates directly to the question immediately above. This, too, is a question for the MPCA that remains unanswered.

One other issue that you and I discussed in our August 15 telephone conversation is the placement of monitoring wells beneath Gilfillan Lake, proposed in the feasibility study to be installed by directional drilling from lakeshore locations. Monitoring wells beneath the lake would provide the assurance of an "early warning" system for homeowners along West Shore Road, Poplar Lane, and East Oaks Road in the event that additional contaminated groundwater crosses the lake to their area. Figure 4.1 in the feasibility study shows proposed monitoring wells MW22A and MW23A beneath Gilfillan Lake some 100 to 200 feet off the west shore in

Areas 4 and 5. It seems to be a shortcoming of the proposed monitoring plan, however, that it includes no monitoring well in Area 3, which encompasses the plume core. A monitoring well beneath Gilfillan Lake could be installed in Area 3 by directional drilling from a publicly held parcel on the lake's east shore between 15 Dove Lane and 9 Gilfillan Road. A monitoring well directionally drilled from this location would be near the east shore rather than the west shore, thereby providing a "very early warning" system for Area 3 homeowners along Gilfillan Lake's west shore.

We are available to meet with MPCA and/or CRA staff to discuss the above issues if you so desire. Please contact me (763-479-4203) or Keith Benker (763-479-4206) if you have any further questions on the above.

Respectfully submitted,

WENCK ASSOCIATES, INC

John B. Erdmann, Ph.D., P.E.  
Principal Environmental Engineer

c: North Oaks City Council  
James March, City Administrator  
Jeff Roos, City Engineer  
Ron Frehner, CRA  
Keith Benker, Wenck Associates, Inc.

Ron Frehner  
Conestoga Rovers & Associates  
1801 Old Highway 8 Northwest, Ste 114  
St. Paul, MN 55155-4194

Re; North Oaks FS

Dear Mr. Frehner;

Thank you for the opportunity to review the Feasibility Report on the remedial alternatives for VOCs in the groundwater within the southeast portion of North Oaks, west of Gilfillan Lake. My review was not for the accuracy of the information presented, but for the completeness of the information as to the scope of the alternatives. In my review, I did note items for which I would like more information with regards to Alternative B4, the municipal water system options.

A common complaint on the system previously installed is that there are frequent periods of low pressure, especially during maintenance activities. This area of North Oaks is on the edge of the White Bear Township service boundaries, so moderate to low pressures are expected and when this option is to add an additional 5000 feet of line, the pressures may even lower. The report indicates that a pressure analysis was conducted as a part of the study. I would like to review that analysis. The intent of this option is to have a remedial system that eliminates local issues, not one that creates new issues on the old system.

The next item I question is the proposed design for a 5000 foot dead end line. I can't find any water design handbook that would support this length of a dead-end extension. The system needs to be looped for water quality purposes and pressure maintenance. My initial thoughts are that the system would need to consider both a booster station and a circulation pump.

In the cost comparisons, water availability charges are included, however estimates of the water usage fees are not. Whether or not the usage fees are used in the comparisons, they should be noted for informative purposes.

If this alternative proceeds, the design and construction should be done under the direction of the city engineer of North Oaks. On the last project, White Bear Township directed the work and there were some issues that could have been handled better by the local engineer. The FS estimates were furnished by White Bear's engineer, but it should not be assumed that they will do the project.

I would be happy to meet with you and discuss any of these items.

Jeffrey Roos

Cc Jim March, City Administrator  
Tom Watson, Mayor