



Minnesota Pollution Control Agency

September 25, 2007

Mr. James Payne
The Environmental Law Group
East Bridge at Riverplace, Suite 114
10 - 2nd Street Northeast
Minneapolis, MN 55413

Mr. Erik Salveson
Halleland, Lewis Nilan & Johnson P.A.
600 U.S. Bank Plaza
220 South Sixth Street
Minneapolis, MN 55402-4501

RE: Highway 96 Dump Superfund Site
Feasibility Study Report July 27, 2007

Dear Mr. Payne and Mr. Salveson:

On June 7, 2007, the Minnesota Pollution Control Agency (MPCA) requested Reynolds Metals Corporation and Whirlpool Corporation, the Responsible Parties (RPs) for the Highway 96 Dump Superfund Site (Site), to complete a Feasibility Study to evaluate potential response actions for vinyl chloride contaminated ground water on the West Side of Gilfillan Lake. On behalf of the RPs, Conestoga-Rovers & Associates (CRA) submitted a report to the MPCA on July 27, 2007 entitled "Feasibility Study Report; VOCs in groundwater- West of Gilfillan Lake, North Oaks, Minnesota" (Report).

MPCA has reviewed the Report, and hereby requests the following modifications:

- 1) Alternative A2 Long- Term Monitoring. This alternative includes the installation of four additional upper St. Peter aquifer monitoring wells. The MPCA requests that the RPs install another directionally drilled monitoring well under Gilfillan Lake in Geographic Area 3. The well should be placed along the west shore of Gilfillan Lake, and be drilled from an area between 8 West Shore Road and 10 West Shore Road. The MPCA requests that you add this recommended well to the Alternative, and modify the cost analysis as needed.
- 2) Alternative A3 Groundwater Extraction and Monitoring. MPCA understands that if a pipeline is needed to convey water to Gilfillan Lake, the pipeline would need to be installed underground. Please modify the Alternative accordingly, or provide an explanation why the pipeline should not be installed underground.
- 3) Alternative B2 Residential Carbon Filter and Monitoring, Section 5.2.6. The second sentence in this section indicates minimal impact to residents during installation of carbon filters and *additional monitoring wells* (italicized for emphasis). To be consistent with other sections (5.2.2, 5.2.3 etc) "additional monitoring wells" should be removed from this sentence.

4) Alternative B4 Municipal Water and Monitoring. The MPCA requests that this alternative be modified to loop the water line to assure water quality and pressure maintenance. The system should include a booster and circulation pump. Please modify the cost estimates and effectiveness accordingly.

5) Section 5.5.4. Reduction of TMV through Treatment. On page 31 for Alternative B2 (Carbon Filters) the Report states that Alternative B2 would reduce the TMV through treatment in potable water used at the residence. The comparison in Section 5.5.4 should therefore indicate that Alternative B2 provides some minimal reduction in TMV.

6) The "B" alternatives do not include the installation of the ground water extraction system, as described in Alternative A3. A statement should be added to the Report to indicate that Alternative A3 could be added to any of the "B" Alternatives, and that the corresponding costs would increase as shown in the cost analysis for Alternative 3.

We request that you respond within thirty (30) days of the receipt of this letter and provide the requested modifications to the Report. Upon receipt of the modifications and pending staff review, the Report will be approved with modifications. If you have any further questions in this matter, please feel free to call Nile Fellows at (651) 296-7299 or Fred Campbell at (651) 296-7267.

Sincerely,

Douglas Wetzstein
Supervisor

cc: Tom Watson, Mayor of North Oaks
Tom Vogt, North Oaks Resident
Jim Kelly, Minnesota Department of Health
Dan Colton, Leonard, Street and Deinard
Ron Frehner, CRA
Carmen Netten, Attorney General's Office
Mark Eisenschenk, North Oaks Resident
Lugene Olson, North Oaks Home Owners' Association
The Honorable Paul Gardner, Minnesota State Representative
The Honorable Senator Sandy Rummel, Minnesota State Senator
The Honorable Carol McFarlane, Minnesota State Representative