

Rick Van Allen

From: Hadiaris, Amy (MPCA) <amy.hadiaris@state.mn.us>
Sent: Monday, September 26, 2016 3:44 PM
To: Joe Otte (jotte@wenck.com)
Cc: Schmitt, Shanna (MPCA); Kubler, Rick E.; Rick Van Allen; Tom Barounis (Barounis.Thomas@epamail.epa.gov)
Subject: RAP approval for Parcels A & D

Staff in the VIC program have completed review of the Response Action Plan (RAP) dated June 2016 for Parcels A & D of the Rice Creek Regional Trail site (VP26640). The two parcels are a subset of the Rice Creek Regional Trail site, which runs from north to south across the former Twin Cities Army Ammunition Plant (TCAAP). Ramsey County is redeveloping the Rice Creek Regional Trail site as a recreational corridor.

The Rice Creek Regional Trail site is comprised of four parcels, referred to as Parcels A through D, as shown on Figure 2 of the RAP. Ramsey County intends to acquire three of the parcels – A, B, and D – from the federal government. A RAP for Parcel B has been previously submitted and approved by the VIC program. The federal government will retain ownership of Parcel C but intends to grant Ramsey County a permanent easement allowing its use as part of the trail corridor.

The RAP proposes excavation and landfill disposal of nine discrete areas of soil impacted by one or more metals (lead, antimony, copper, thallium, arsenic) at concentrations greater than the MPCA's residential soil reference values (SRVs). In addition, the RAP proposes extension of the existing four-foot thick soil cover at Installation Restoration Program (IRP) Site C. The U.S. Army constructed the soil cover at IRP Site C in 2008, following excavation, stabilization, and landfill disposal of approximately 21,450 cubic yards of metals-impacted soil. Because the U.S. Army's soil remediation was based on site-specific industrial cleanup values (e.g. 1200 milligrams per kilogram for lead), residual contamination in shallow soil along the south and southeast perimeter of the existing cover exceeds the MPCA's SRVs for unrestricted use.

After completion of the proposed remedial actions, Incremental Sampling Methodology (ISM) will be used to document that the average concentration of metals and polynuclear aromatic hydrocarbons (PAHs) in shallow soil across the remainder of Parcels A and D meets the MPCA's criteria for unrestricted use. On September 22, 2016, Wenck submitted a minor modification to the RAP; specifically, eliminating a few ISM grab samples from one of the Parcel D decision units due to the presence of two large stockpiles (concrete/asphalt) which currently cover a small portion of Parcel D.

The RAP and minor modification described above are approved. After the concrete/asphalt stockpiles have been removed, please collect a few composite confirmation samples from the stockpile footprints for analysis of PAHs, to document lack of residual soil contamination from the asphalt stockpile.

If you have any questions, please contact me or Shanna.

Regards,

Amy

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