

Rick Van Allen

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**From:** Schmitt, Shanna (MPCA) <[shanna.schmitt@state.mn.us](mailto:shanna.schmitt@state.mn.us)>  
**Sent:** Wednesday, October 12, 2016 9:21 AM  
**To:** Joe Otte ([jotte@wenck.com](mailto:jotte@wenck.com))  
**Cc:** Kubler, Rick E.; Rick Van Allen; Tom Barounis ([Barounis.Thomas@epamail.epa.gov](mailto:Barounis.Thomas@epamail.epa.gov));  
Hadiaris, Amy (MPCA)  
**Subject:** RE: Rice Creek Regional Trail (VP26640) - Parcel B RAP

Joe,

Thanks for submitting the Revised Parcel B Response Action Plan, dated 05/20/2016 for the Site.

We've reviewed the Revised RAP and our comments have been addressed. The Revised RAP for Parcel B is approved.

Thanks, Shanna

**Shanna Schmitt, PG, CPG**

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**From:** Hadiaris, Amy (MPCA)  
**Sent:** Wednesday, May 11, 2016 8:55 PM  
**To:** Joe Otte ([jotte@wenck.com](mailto:jotte@wenck.com)) <[jotte@wenck.com](mailto:jotte@wenck.com)>  
**Cc:** Kubler, Rick E. <[Rick.Kubler@gpmlaw.com](mailto:Rick.Kubler@gpmlaw.com)>; Rick Van Allen ([rickv@BAYWEST.com](mailto:rickv@BAYWEST.com))  
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**Subject:** Rice Creek Regional Trail (VP26640) - Parcel B RAP

Hi Joe,

Can you please make the clarifying edits listed below to the Parcel B RAP? We would like a clean copy for MPCA's file. We'll send formal approval via email when the revised document is received. In the meantime, you can certainly get the ball rolling. Give me a call if you want to discuss any of the comments below.

Also –

Based on the CCP, it sounds like an inspection and follow-up sampling of soil beneath sumps is already planned, to some extent? I just want to make sure my understanding in this regard is correct. The 1986 TCAAP sump inspection, referenced in the Plexus report (Section 3003), mentions that some (unspecified) 135-PTA sumps were compromised and had exfiltrated. Removal of these features is the perfect time to put that concern to rest. For convenience, I've attached a figure from a March 2002 "Site Inspection" report, prepared by ATK, which shows the location of sumps and sewer lines at the 135-PTA. Apparently there is one additional sump, not shown on the attached ATK figure, just north of Building 172. This additional sump was observed during the Plexus reconnaissance. All of the sumps are exterior to the buildings so don't qualify as "floor penetrations". For any sump that appears cracked or damaged in any way, please collect a subsurface soil sample. In the absence of elevated PID readings (make sure bulb can register carbon tetrachloride) I'd be content with just lead and barium, given the potential COCs.

As was done with manufacturing buildings in the redevelopment area to the south, please document the location of interior floor drains and collect a few representative samples of soil beneath floor penetrations.

Regards,

*Amy K. Hadiaris, P.G.*

*Voluntary Investigation and Cleanup Program*

*Minnesota Pollution Control Agency*

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**Section 2.2.3**

*“Groundwater flow in the shallow water table aquifer (Unit 1) is controlled by surface water features such as ditches and wetlands on TCAAP. ~~In the northern area of~~ At the Site (Parcel B), flow is generally toward Rice Creek and its local tributaries. ~~In the southern portion of the Site, flow is less well understood but has been found to not flow off of the former TCAAP property.~~”*

It sounds like the original text may have been written with a different definition of “Site” in mind, hence the suggested edit. One wouldn’t expect a significant difference in the groundwater flow regime between the northern and southern portions of Parcel B.

### **Section 3.5**

*“Tetra Tech advanced five borings in Section 3003 (RI-3003-01 through RI-3003-05)... The Tetra Tech sampling locations are depicted on Figure 3.”*

Figure 3 seems to show only one Tetra Tech sampling location on the Site (Parcel B). Were the other four Tetra Tech Section 3003 sampling locations outside of the Parcel B footprint? Edit text/figure as needed to clarify.

### **Section 4.3**

Include mention of ISM in list of response action tasks.

### **Section 4.6.1**

*“Demolition and other non-RAP activities will be conducted under ~~an~~ the MPCA-approved Revised Construction Contingency Plan (and Response Action Plan (Wenck, December 2015-February 2016)(CCP), which has been separately submitted to MPCA for review and approval. Any contamination discovered during non-RAP activities will be subject to investigation, characterization and, if necessary, remediation, in accordance with the CCP.”*

### **Section 4.6.2.2**

*“ISM sampling (per the project QAPP) will be conducted after demolition of site structures and upon successful completion of the removal of the three “hot spots” discussed above. ISM soil samples will be analyzed for PAHs and RCRA metals. Soil results will be compared to the MPCA Tier 1 Residential SRVs ~~and Screening SLVs...~~”* Given the specific contaminants of concern at the Site, the reference to Screening SLVs is not needed.

### **Section 5.0**

In the Final Documentation Report, please include a comprehensive table containing all historical soil data collected at the Site (Parcel B).

***Table 1***

Title references Section 4007 (should be Section 3003)

***Table 2***

Oops - this table doesn't seem to pertain to this project. (Delete from Table of Contents also)