



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

Telephone (612) 296-6300



Ms. Kelly Ahlschwede
Conoco Inc.
P.O. Box 4784
Houston, Texas 77210-4784

October 25, 1990

Dear Ms. Ahlschwede:

RE: Corrective Action Design Approval

Site: Former Conoco Station #23034, 1126 South Robert Street, West St. Paul
Site ID#: LEAK00000858

The Minnesota Pollution Control Agency (MPCA) has received your Petroleum Hydrocarbon Release Investigation and Corrective Action Design Report dated July 23, 1990, outlining the remedial investigation which has taken place to date and describing the proposed corrective action for the above referenced site. The information information submitted to date indicates that:

- o The release apparently had occurred from one or more of the three underground storage tanks (USTs) which were removed prior to the sale of the site by Conoco to Rapid Oil Change in 1983. The USTs included two 5,000 gallon tanks and one 10,000 gallon tank.
- o Eight soil borings have been advanced on site and five soil borings were advanced off site to the north and west. Three monitoring wells were completed on site and one completed off site to the northeast.
- o Soil was found to be contaminated at levels of 100 times the recommended allowable limits for benzene in soil borings D-1, D-3, TB-1, TB-6, MW-2, and MW-3.
- o Up to 0.81 feet of free product was measured in monitoring well MW-3. Ground water contaminants have also been detected in MW-2 and MW-4. The direction of ground water flow is to the northwest with a velocity of approximately 0.076. ft/day.
- o A ground water receptor survey indicated there was a well located approximately 2000 feet to the southeast.

Based on the available information, it appears that the remedial investigation has adequately defined the extent of soil and ground water contamination at this time. The MPCA approves the proposed Corrective Action Design which consists of a ground water/product recovery system and a soil venting system with the following comments and qualifications:

1. Approval for discharge of ground water effluent from the recovery system into the sanitary sewer system must be obtained from the Metropolitan Waste Control Commission (MWCC). The MPCA agrees that ground water contaminant levels might be high enough to require additional treatment prior to discharge into the sanitary sewer system.

Ms. Kelly Ahlschwede

Page 2

October 25, 1990

2. Because of the presence of the free product, it is important that a recovery system be installed as quickly as possible.
3. Approval of the proposed soil venting system must be obtained from the MPCA Air Quality Division. The vent system stack emissions should be monitored at startup and one week after startup with laboratory samples. The enclosed "Request for Air Quality Impact Analysis of Remedial Action" form should be submitted to the MPCA Tanks and Spills Section within 10 days after initial startup. Paul Gerbec of the MPCA Air Quality Division (612/296-7757) should be contacted regarding sampling techniques and future monitoring requirements. Some type of emission control may be required if hydrocarbon levels are found to be excessive.
4. Each vapor extraction point should have an individual valve and the capability to monitor pressure, flow rate, and air quality. Routine monitoring should be conducted immediately upon system start up, weekly for the first month and monthly thereafter during system operation. Air quality samples should be analyzed for benzene, toluene, ethyl benzene, total xylenes (BTEX).
5. Quarterly monitoring of the monitoring wells should commence with the installation of the recovery system. Water level elevations should be measured and water quality samples collected from all monitoring wells. Water quality samples should be analyzed for BTEX and total hydrocarbons as gasoline.
6. Collection of influent and effluent water samples from the ground water recovery system should commence immediately with the completion of the system installation. Samples should be collected on a monthly basis and analyzed for BTEX and total hydrocarbons as gasoline.
7. A progress report as outlined in the MPCA guidance "Petroleum Tank Release Reports" dated May 18, 1990, should be submitted to the MPCA within 45 days after the soil venting system and ground water recovery system has been in operation. This report should also include an "as built" section which details the recovery system specifications as installed.
8. Quarterly monitoring reports should be submitted to MPCA staff for review. Monitoring reports for this site should simply include a table summarizing all soil venting monitoring data in chronological order by sampling port, a table summarizing water table elevations and a table summarizing the water chemistry data. A progress report summarizing the work done to date and including recommendations for future work should be submitted once a year.

Ms. Kelly Ahlschwede

Page 3

October 25, 1990

9. MPCA staff will consider closure requests for the soil venting system based on the trends observed from emissions monitoring data. The system should not be shut down without prior MPCA approval. Additional soil borings and laboratory analysis of soil samples may be required prior to site closure. The location of the soil borings should be approved by MPCA staff.
10. If the groundwater sample analyses continue to show increasing levels of petroleum contamination in monitoring well MW-4, additional monitoring wells may be required to monitor the extent of groundwater contamination the down gradient direction. The location of the monitoring wells should be approved by MPCA staff.
11. Following approval of site closure, all soil venting lines, monitoring points, and monitoring wells should be properly abandoned by excavating the system or filling with neat cement grout in accordance with the Minnesota Department of Health Water Well Construction Code.

We expect, based on the available information, that completion of the approved corrective action will support a determination by the MPCA Commissioner that the release has been adequately addressed pursuant to Minn. Stat. § 115C.09, subd. 2(b)(1) (1988). We therefore do not expect any additional cleanup enforcement action by the MPCA will be necessary. However, if subsequently obtained information indicates that the approved corrective actions are inappropriate or inadequate, the MPCA may require additional work or modifications in the approved work.

In approving the plan, the MPCA does not assume any liability for the design or implementation of this remedy. You remain solely responsible for ensuring that this plan results in a successful cleanup and that its implementation does not result in any harm to public health or the environment. Moreover, the MPCA does not guarantee reimbursement of your costs from the Petroleum Tank Release Compensation Board (Petro Board). Application for reimbursement must be made to the Petro Board (612/297-4017). However, that decision is based on factors such as the adequacy of cleanup, compliance with notification laws and cooperativeness with the MPCA.

If you have any questions or comments please contact me at 612/643-3433.

Sincerely,



David A. Scheer
Pollution Control Specialists, Senior
Tanks and Spills Section
Hazardous Waste Division

DAS:np



Minnesota Pollution Control Agency

SIGNATURE MEMO

458

DATE 10/28/90

	INITIAL	DATE	DATE
TO: <u>Dave</u>			
FROM:			

RETURN TO: (AUTHOR) Catala

(SECTION)

COMMENTS: _____

Originated:

- Air Quality Division
- Ground Water/Solid Waste Div.
- Hazardous Waste Division
- Water Quality Division
- Administration/_____

bcc:

White, Green

IDENTIFICATION NUMBER: _____/_____
DATE DUE: