



Minnesota Pollution Control Agency

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February 24, 2014

CERTIFIED MAIL NO. 7006 0100 0006 5937 1850
RETURN RECEIPT REQUESTED

Mr. Michael McGowan
R.B. McGowan Company, Inc.
7205 Fleetwood Drive
Edina, MN 55439

RE: Freeway Landfill Post-closure Monitoring

Dear Mr. McGowan:

On June 4, 2012, the Minnesota Pollution Control Agency (MPCA) issued an Administrative Order (Order) to R.B. McGowan Company, Inc. (Regulated Party) to address compliance with the post-closure care requirements, including landfill gas and groundwater sampling at the Freeway Landfill. This letter discusses changes that are required to the post-closure care requirements based on the recent results and in anticipation of an event (termination of the quarry pumping) that has the potential to impact environmental conditions at the landfill.

Landfill Gas: In part, the Order required that the Regulated Party complete gas probe documentation, gas probe evaluation, and perform gas probe sampling on a quarterly basis. On June 22, 2012, your consultant informed the MPCA that the gas probe documentation was completed. Correspondence from your consultant dated September 12, 2012, identified that the gas probe evaluation was completed, and that quarterly gas probe sampling had commenced.

The MPCA has reviewed the recent gas sampling results. These gas results are highly inconsistent with the June 2005 Subsurface Investigation Report of the Freeway Landfill by Fuller Engineering Services and with normal levels of gas production from closed landfills. The lack of methane detection in the existing network is especially troubling, given the location of the network relative to the Freeway Landfill's large waste mass and lack of an engineered venting system. The MPCA has specific concerns that no gas monitoring probes exist adjacent to the U.S. Salt office building and at the property boundary south of the same building.

Therefore, pursuant to Minn. R. 7035.2655, subp. 1, item B, the MPCA requires the Regulated Party to amend the February 1991 landfill post-closure plan to include installation of six new gas monitoring probes (see enclosed Figure 1 for probe locations). The probes should thereafter be monitored quarterly for the same gas parameters contained in the post-closure plan.

Groundwater: The Order also requires the Regulated Party conduct sampling and analysis of groundwater on a quarterly basis. The MPCA has reviewed the groundwater sampling results. While the results to date are helpful, the MPCA remains concerned that the monitoring does not adequately address the influence of the nearby Kraemer Quarry on local groundwater flow. When the quarry quits operating, the natural groundwater flow to the north to the Minnesota River will resume. A previous investigation conducted by MPCA in 1999 and subsequent modeling by the MPCA predicted that when

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the quarry quits operating, groundwater flow under the Freeway Landfill will be reversed, and will negatively impact the nearby Minnesota River depending on levels of contamination. Given the significant time since the MPCA's investigation, and because of changes in surface water standards, additional groundwater information and modeling is needed to determine anticipated impacts to the river when quarry pumping ceases, and whether changes to the post-closure contingency action plans will be needed to protect the river. In addition, potential impacts to the Burnsville drinking water supply need to be studied.

Therefore, pursuant to Minn. R. 7035.2655, subp. 1, item B, the MPCA requires the Regulated Party to amend the February 1991 landfill post-closure plan to include installation of three additional groundwater monitoring wells along the northern boundary of the site (see enclosed Figure 2 for monitoring well locations) and to thereafter monitor those wells in the same manner as the existing wells.

The wells shall be installed in compliance with Minn. R. ch. 4725, Wells and Borings, constructed using 10-foot, 10-slot stainless steel screens, and be screened across the water table, with two feet of the screens above the water table. After the wells are installed, the Regulated Party shall collect a minimum of two rounds of groundwater samples in accordance with the MPCA Closed Landfill Program, Sampling Protocol for Monitoring Wells, October 10, 2008, document (enclosed). Analyses must include volatile organic compounds (Method 8260B) and metals (Method 200.8), as well as the physical parameters of elevation, temperature, and conductance. The Regulated Party must collect quarterly groundwater elevation data from these wells as part of the long-term facility groundwater monitoring.

The MPCA requests that the Regulated Party notify the MPCA of its intention to make the required amendments within 10 days of receipt of this letter, and to submit the requested amendment to the post-closure plan within 60 days of the date of this letter. The amendment to the post-closure plan should include a schedule for construction of the new features identified in this letter. If you have any questions or would like to meet, please contact me and I will schedule a meeting.

Please contact me with any questions at 507-344-5253.

Cory Boeck
Compliance Coordinator
Mankato Office
Industrial Division

Douglas Day
Supervisor
Closed Landfill & Emergency Response Section
Remediation Division

CB/DD:czh

Enclosures

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cc: The following people have received a copy of this letter:

Ann Cohen, Attorney General's Office

Kirk Koudelka, MPCA Assistant Commissioner

Heather Johnston, Burnsville City Manager

Brandt Richardson, Dakota County Administrator

Kathy Sather, MPCA

Heidi Kroening, MPCA

Ralph Pribble, MPCA

Enforcement Data Coordinator, MPCA - Enforcement Database Tracking Number 14835