

MEMORANDUM (DRAFT)

TO: FILE 990
Waste Management, Savage

FROM: Jim Lundy

DATE: November 4, 1991

RE: Supplemental Remedial Investigation
October 23, 1991

VAX FILE:[lundy.ri]990.mem

MPCA staff have reviewed the above correspondence from Waste Management's consultant (Foth and Van Dyke). The letter report responds point by point to a preceding MPCA letter dated July 11, 1990. MPCA staff have the following responses to the letter report, arranged in a similar point by point format.

Comment #1:

The March 1, 1991 work plan by Foth and Van Dyke, verbally approved by MPCA staff on March 15, 1991, indicated one proposed boring on the east (downgradient) side of UST #1, but no such boring was drilled. Furthermore, drilling logs of boring B-1 and B-3 indicate "strong" odors, and "petroleum" odors were present. Clearly, a release from UST #1 has occurred, and ground water directly downgradient of the tank location need to be investigated. Therefore a downgradient (onsite) well is necessary.

Comments #2 and #3:

The Foth and Van Dyke letter report adequately covers these concerns.

Comments #4 and #5:

The text of the letter report explains that the reported location of test pit TP-2 (figure 2-2 of the March 1990 Petroleum Tank Release Corrective Action Report) was incorrect. No map is provided to clarify the new reported location. The new reported location, directly upgradient of well MW-2, contradicts the initially reported location, and is by coincidence to Waste Management's advantage. MPCA staff will need more substantiated documentation (e.g., photographs) of the true test pit location. Without ^{it}, the argument against the need for additional downgradient ground water investigation carries no weight.

Contaminants in ground water downgradient from well MW-2 might most effectively be measured by sampling water from a boring, which would be properly abandoned immediately after sampling.

Please provide the results of the above field tasks when available. If necessary, a corrective action design for soil and/or ground water should be included. At minimum, further work at this site shall include long-term ground water monitoring, as described in MPCA guidance documents ("Ground Water

Monitoring, May 1991").

MPCA staff

will consider closure of the site based on these data.

