



# Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

Telephone (612) 296-6300

December 3, 1991

Mr. Craig L. Johanesen  
Foth and Van Dyke  
10340 Viking Drive  
Suite 100  
Eden Prairie, Minnesota 55344

Dear Mr. Johanesen:

Re: Waste Management, Savage  
Leak #000990

The Minnesota Pollution Control (MPCA) staff has reviewed the supplemental remedial investigation information you have provided dated October 23, 1991. 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 needs 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 substantive 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.

Mr. Craig L. Johanesen

Page 2

December 3, 1991

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 a 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 this information.

Should you have any questions, please call me at 612-297-8613.

Sincerely,



John R, Moeger  
Project Leader  
Tanks and Spills Section  
Hazardous Waste Division

JRM:np

cc: Mike Berkopec, Waste Management, Savage