

November 20, 2018

Robin Center LLP
3500 American Blvd Ste 200
Minneapolis, MN 55431

Property Owner:

The Minnesota Pollution Control Agency (MPCA) is requesting permission to access your property to collect a sample of the air from under the ground near the building and/or within your building located at the following addresses: 4152 Lakeland Ave N, 4048 Lakeland Ave N, 4050 Lakeland Ave N, 4044 Lakeland Ave N and 4100 Lakeland Ave, all in Robbinsdale, MN – this is called a soil vapor sample. We want to do this to see whether contaminated vapors are present at your property. The chemicals Tetrachloroethylene and Trichloroethylene have been identified during past investigations at or near your property (see attached map) at levels of concern.

Where is the contamination coming from?

We have not identified where the contamination originated. However, we do know the chemical of concern is Tetrachloroethylene, also known as PCE, and Trichloroethylene, also known as TCE. Part of our investigation includes finding the contamination source. (See attached Minnesota Department of Health PCE and TCE fact sheets)

Why does MPCA want to do this?

Contaminated soil vapors can move through the ground and seep through basement and foundation cracks into indoor air. This is called vapor intrusion and can potentially create a health concern. Preventing soil vapors from entering your building can improve the quality of the air, especially in the basement and in lower levels.

The amounts of chemicals in contaminated vapors that enter into buildings are typically not high enough to impact most people's health. However, there may be health concerns when 1) exposures occur for a long period of time, 2) the amount of chemicals is high, and/or 3) a sensitive individual is present.

Sample results will tell us the amount of vapor contaminants near and/or beneath your building. The results will be compared to MPCA screening values. If the results show amounts of chemicals below the ground are greater than the screening values, there is some chance that contaminants may be present in the air within your building.

What does the sampling involve?

The MPCA hired Wood Environment & Infrastructure Solutions (Wood) to conduct soil vapor sampling. The soil gas sampling work includes:

- Drilling a sampling point(s) on the property near the building. The sampling point will require drilling an approximately two-inch diameter hole about three to five feet below the ground surface.
- Collecting the vapor sample(s) and then sealing the hole after sample collection.

Each sample takes approximately two hours. After the sample results are analyzed, you will receive a copy of the results for your records.

What if a risk is identified?

If contaminants below your building exceed the screening values, building mitigation will be required to address the vapor intrusion risk.

What actions should I take?

- Sign the attached access agreement and return it to MPCA. You will receive a copy of the finalized agreement.
- Please cooperate with Wood when they contact you to schedule the sampling work. You will need to be present at the time of the sampling. Our contractor will work with you to perform the sampling in an acceptable location.
- After reviewing the attached fact sheets, if you believe you or someone in your building may be a sensitive individual, please call or email the Minnesota Department of Health (MDH) at 651-201-4897 or health.hazard@state.mn.us.
- Notify building occupants/tenants regarding the potential vapor intrusion risk. The enclosed documents from MDH (e.g. Your Health and Vapor Intrusion) can be used to provide notification and information regarding the risks as well as MDH contact information.

For more information, contact:

- Sampling questions: Andri Dahlmeier at 651-757-2718 and andri.dahlmeier@state.mn.us, or Cory Vowles at Wood at 612-252-3789 and cory.vowles@woodplc.com.
- Health-related questions, contact the Minnesota Department of Health at 651-201-4897 or health.hazard@state.mn.us.

Attached with this letter is additional information on PCE, vapor intrusion and health effects. **Additional information regarding contaminated soil vapor issues** can be found at <https://www.pca.state.mn.us/waste/what-vapor-intrusion>.

Sincerely,



Andri Dahlmeier
Project Manager
Site Remediation & Redevelopment Section
Remediation Division

AD/JA:bhj

Enclosures: MPCA Access Agreement Form
Soil Vapor Sampling Map
MDH What Is Vapor Intrusion Information Sheet
MDH Your Health and Vapor Intrusion Information Sheet
MDH PCE in Air Information Sheet
MDH TCE in Air Information Sheet

Background

The Minnesota Pollution Control Agency (MPCA) is investigating and remediating a release or threatened release of hazardous substances and pollutants or contaminants in and around property owned by **Robin Center LLP** located at the following addresses with the Property Identification Number (PIN or PID) associated with each:

4152 Lakeland Ave N Robbinsdale, MN 55422 – PIN: 0602924120123
4048 Lakeland Ave N Robbinsdale, MN 55422 – PIN: 0602924130127
4050 Lakeland Ave N Robbinsdale, MN 55422 – PIN: 0602924130128
4044 Lakeland Ave N Robbinsdale, MN 55422 – PIN: 0602924130129
4100 Lakeland Ave N Robbinsdale, MN 55422 – PIN: 0602924130145

The MPCA is authorized to enter the Property to take these actions under Minn. Stat. § 115B.17, subd. 4 and § 115.04, subd. 3.

Agreement

1. **Parties.** The Parties to this Agreement are:
 - A. Minnesota Pollution Control Agency (MPCA); and
 - B. Robin Center LLP (the "Property Owner").

2. **Access.** The Property Owner hereby consents and provides authorization to the MPCA, its employees, agents, and contractors to enter the Property for the following purposes:
 - A. Investigating and/or taking such response actions as the MPCA deems necessary to respond to the release or threatened release of hazardous substances and pollutants or contaminants at the Property located at the addresses above including soil-gas sampling near property building(s) and/or sub-slab sampling within property building(s) to test for the presence of vapors near or beneath the Property. To collect sub-slab samples, those contractors necessary to do the sampling will have to enter the Property to identify the appropriate sampling location(s) in the basement or lowest level of the building.
 - B. Inspection of a sub-slab vapor ventilation system if contamination is found in the soil vapors beneath the building at concentrations above acceptable levels set by the MPCA.

3. **MPCA obligations.** The MPCA will notify the Property Owner at least 48 hours before entering the Property. Work will be conducted during the hours of 8:00 a.m. to 5:00 p.m. unless the MPCA receives permission to conduct work during different hours.

4. **MPCA and Property Owner precautions regarding work.**
 - A. The MPCA will conduct its activities so as to avoid unreasonable interference with the use of the Property. If any portion of the Property must be disturbed as a result of MPCA's activities, the MPCA will restore the property as close to its original condition as is reasonably possible under the circumstances.
 - B. The Property Owner will take reasonable precautions to ensure that the equipment of MPCA and its contractors on the property is not damaged, and that the work being conducted by MPCA, its employees, agents and contractors is not disrupted.

5. **Property Owner Contact Information.** All correspondence sent to the Property Owner should be addressed to:

Name (please print): _____
Street address or PO Box: _____
City, State ZIP: _____
Phone Number: _____
e-mail: _____

6. **MPCA Contact Information.** The MPCA contact for this project is:

Andri Dahlmeier
Remediation Division
MPCA
520 Lafayette Rd. N.
Saint Paul, MN 55155-4194
Telephone: 651-757-2718
Email: andri.dahlmeier@state.mn.us

7. **MPCA Liability.** The MPCA shall be liable for injury to or loss of property, or personal injury or death, caused by an act or omission of any employee of the State in the performance of the work described above, under the circumstances where the State, if a private person, would be liable to the claimant, in accordance with Minn. Stat. § 3.736.
8. **Effective Date.** This Agreement shall be effective upon the date it is signed by the MPCA.
9. **Rights of MPCA Reserved.** Nothing in this Agreement shall be construed to limit or diminish the right of the MPCA to take any action authorized by the Minnesota Environmental Response and Liability Act (MERLA) or other law with respect to any release or threatened release of a hazardous substance or pollutant or contaminant.

Certification

By their signatures below, the undersigned represent that they have authority to bind the parties they represent, their agents, successors, and assigns.

Minnesota Pollution Control Agency

Print name: _____
Title: _____
Signature: _____
Date: _____

Property Owner

Print name: _____
Title: _____
Signature: _____
Date: _____

Trichloroethylene (TCE) in Air

TCE is a solvent used for degreasing metal parts during the manufacture of a variety of products. It can be found in consumer products, including some wood finishes, adhesives, paint removers, and stain removers. TCE can also be used in the production of other chemicals.

TCE:

- is a nonflammable, colorless liquid or gas
- evaporates easily into air
- smells sweet at high concentrations; at lower levels, there is no odor

People may breathe TCE from:

- working in industries that produce or use TCE
- living or working near facilities that release TCE to the air
- using TCE-containing products
- vapors from contaminated soil or groundwater that moves into indoor air

Health concerns from breathing TCE

Most exposures to TCE in air are to low amounts and not likely to result in a health effects. The possibility of health effects depends on the amount of TCE in air and how long people breathe it.

Exposure to TCE in the first eight weeks of pregnancy may increase the risk of heart defects in the baby. In most cases, this risk is thought to be extremely low. TCE may also affect the immune system – this includes changes to the developing immune system in early life. TCE may also harm the central nervous system, kidney, liver, and male reproductive system.

Studies in workers and animals breathing very high levels of TCE suggest that long-term exposures may increase the risk of certain types of cancer (kidney, liver, and non-Hodgkin's lymphoma).

TCE Air Values

The Minnesota Pollution Control Agency (MPCA) develops Intrusion Screening Values (ISVs) to understand when actions may be needed to protect health. The Residential ISV is an amount that is safe for people to breathe. This level is protective for sensitive people, including children, pregnant women, and people who already have health issues.

ISVs are much lower than the regulatory limits set for workplaces where the chemical is used. Breathing an amount of TCE that is above the ISVs does not mean health effects will occur; however, the risk for health effects increases as the level of exposure increases. When ISVs are exceeded, MDH recommends steps be taken to reduce exposures.

Value	Description
2.1 $\mu\text{g}/\text{m}^3$	Residential ISV - a safe level that protects all people from health effects.
7 $\mu\text{g}/\text{m}^3$	Workplace ISV - a safe level for people who may have exposures in the workplace over many years.
>1,000 $\mu\text{g}/\text{m}^3$	Level at which rodents in laboratory studies experienced subtle immune system effects.
55,000 $\mu\text{g}/\text{m}^3$	Regulatory occupational exposure limit.
>100,000 $\mu\text{g}/\text{m}^3$	Level at which some workers experienced health effects, including an increase in kidney cancer.

(measured in micrograms per cubic meter, or $\mu\text{g}/\text{m}^3$)

Minnesota Department of Health
Site Assessment and Consultation Unit
Phone: 651-201-4897; email: health.hazard@state.mn.us
To obtain this information in a different format, call: 651-201-4897.

Tetrachloroethylene (PCE, perc) in Air

PCE is used for dry cleaning, degreasing metal parts, and in the production of other chemicals. It can be found in consumer products, including some adhesives, automotive parts cleaners, and stain removers.

PCE:

- is a nonflammable, colorless liquid or gas
- evaporates easily into air
- smells sweet at high concentrations; at lower levels, there is no odor

People may breathe PCE from:

- working in industries that produce or use PCE
- living or working near dry cleaning facilities or from recently dry-cleaned clothes
- using PCE-containing products
- vapors from contaminated soil or groundwater that moves into indoor air

Health concerns from breathing PCE

Most exposures to PCE in air are to low amounts and not likely to result in a health effects. The possibility of health effects depends on the amount of PCE in air and how long people breathe it.

Exposures to high amounts of PCE can cause neurological effects such as vision changes or delayed reaction time. PCE may cause cancer based on studies in the workplace. The studies suggest there may be an increase in bladder cancer, non-Hodgkin's lymphoma, and multiple myeloma. PCE exposure to rodents also increases liver tumors and leukemias.

It is not known whether children are more susceptible than adults to the effects of PCE. There is not conclusive evidence from human studies that PCE exposure is linked to effects to a developing fetus.

About PCE Air Values

The Minnesota Pollution Control Agency (MPCA) develops Intrusion Screening Values (ISVs) to understand when actions may be needed to protect health. The Residential ISV is an amount that is safe for people to breathe. This level is protective for sensitive people, including children, pregnant women, and people who already have health issues.

ISVs are much lower than the regulatory limits set for workplaces where the chemical is used. Breathing an amount of PCE that is above the ISVs does not mean health effects will occur; however, the risk for health effects increases as the level of exposure increases. When ISVs are exceeded, MDH recommends steps be taken to reduce exposures.

Value	Description
3.4 $\mu\text{g}/\text{m}^3$	Residential ISV - a safe level that protects all people from health effects.
33 $\mu\text{g}/\text{m}^3$	Workplace ISV - a safe level for people who may have exposures in the workplace over many years.
40,000 $\mu\text{g}/\text{m}^3$	Level at which workers experienced a change in color vision after exposure for many years.
170,000 $\mu\text{g}/\text{m}^3$	Regulatory occupational exposure limit for dry cleaner workers.

(measured in micrograms per cubic meter, or $\mu\text{g}/\text{m}^3$)

Minnesota Department of Health
 Site Assessment and Consultation Unit
 Phone: 651-201-4897; email: health.hazard@state.mn.us
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What is Vapor Intrusion?

Chemicals that have been spilled or dumped on the ground can pollute soil and groundwater. Volatile organic compounds (VOCs) are chemicals that easily evaporate into air. VOCs that evaporate from polluted soil and groundwater can create chemical vapors underground. If these vapors move and come in contact with a building, they may enter through cracks in the foundation, around pipes, or through a drain system. The VOCs can then contaminate indoor air. This process - when pollution moves from air spaces in soil to indoor air - is called vapor intrusion.

The VOCs found most often during vapor intrusion investigations in Minnesota are the industrial degreaser trichloroethylene (TCE), the dry cleaning solvent tetrachloroethylene (perchloroethylene, PCE), and components of petroleum. Examples of properties that can be sources of these VOCs are industrial manufacturers, dry cleaners, and metal plating shops.



What is the purpose of a vapor intrusion investigation?

Buildings are investigated for vapor intrusion to determine if there is any risk for chemical vapor entry or a potential health concern. For there to be a health concern, contaminated vapor has to get into the indoor air at levels of concern AND people need to breathe the contaminated indoor air over time. Health risks from vapor intrusion are usually low, but it is important to take steps to reduce or eliminate vapor intrusion where possible.

What happens if vapor intrusion is suspected?

Vapor intrusion is investigated by collecting environmental samples to look for the presence of chemicals and the amounts of chemicals. If chemicals are present near buildings, it may be necessary to collect samples of sub-slab soil vapor or indoor air. Sub-slab samples are collected by drilling a small hole through the foundation to collect a sample of soil vapor from beneath the building.

What is done to reduce vapor intrusion and improve indoor air quality?

If soil vapors under your building are found at levels that indicate a concern, a mitigation system (sub-slab depressurization system) may be needed to vent vapors from beneath the foundation to the outside air. These are the same systems commonly used to keep radon from entering buildings. Other approaches, such as adjusting building pressurization or HVAC controls, may also be effective in some cases.

Is my drinking water affected?

Vapor intrusion is often associated with contamination of shallow groundwater or soil. Municipal drinking water usually comes from deep wells or surface water, and is routinely tested for contamination to ensure it meets standards. If you use a private well for drinking water and your property is undergoing a vapor intrusion investigation, contact us for more information.

Questions? Contact the Minnesota Department of Health

Site Assessment and Consultation Unit

Call: (651) 201-4897 or Email: health.hazard@state.mn.us

www.health.state.mn.us/divs/eh/hazardous/topics/vaporintrusion.html

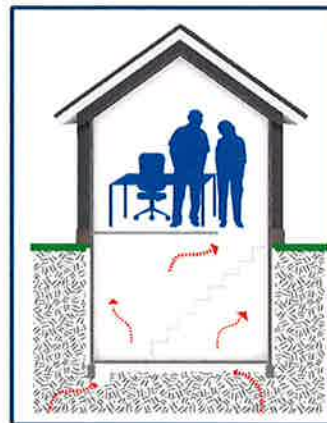
Your Health and Vapor Intrusion

Your workplace is in an area where the Minnesota Pollution Control Agency is conducting a vapor intrusion investigation.

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Should I be concerned?



If your workplace is affected by vapor intrusion, people in the building may breathe contaminated air. Usually, the amount of chemicals that enter a building from contaminated soil vapor is not a health concern for most people. However, even small amounts of some contaminants may pose a health concern for sensitive individuals, especially for **women who are pregnant or may become pregnant**. If you are a sensitive individual who regularly occupies a building where vapor intrusion may be occurring, please notify the Minnesota Department of Health.

Questions? Contact the Minnesota Department of Health

Site Assessment and Consultation Unit

Call (651) 201-4897 or Email health.hazard@state.mn.us

<http://www.health.state.mn.us/divs/eh/hazardous/topics/vaporintrusion.html>



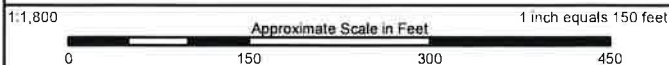
Legend

- Proposed Soil Vapor Sample Locations
- Approximate Site Boundary
- Hennepin County Parcel Boundaries

PROPOSED SAMPLE LOCATIONS

Closed Sites Soil Vapor Investigations
 Hennepin Group 1
 VP11410/VP11411 Robin Center Shopping Center
 Robbinsdale, Hennepin County, Minnesota

Note: 2016 Imagery courtesy of MnGeo WMS



Date: 11/02/2018
 Drawn: MJV
 Checked: ED

Project No. 18190011

Figure: **1**