

March 9, 2020

Ms. Mary Gail Scott, CHMM, Environmental Compliance Manager
Water Gremlin Company
4400 Otter Lake Rd
White Bear Township MN 55110

RE: Supplemental Remedial Investigation Summary Report
Water Gremlin Company
MPCA Site ID: SR0001534

Dear Ms. Scott:

On February 21, 2020, the Minnesota Pollution Control Agency (MPCA) received Water Gremlin Company's Draft Supplemental Remedial Investigation Summary Report (SRI Report) dated February 2020, prepared by Wenck Associates, Inc. MPCA Site Remediation and Redevelopment staff have reviewed the SRI Report.

Specific comments on the SRI Report can be found on a PDF copy of the report located at the following link:

[REDACTED]

The comments included in the PDF require additional clarity throughout the report. The following comments relate to additional investigations required to delineate the extent and magnitude of impacted media:

1. MPCA staff agree with Section 8.0 Conclusions Item 1 that while lead exceeds Tier 2 Industrial Soil References Values at several on-site locations, worker exposure to the lead-impacted shallow site soils is unlikely during normal operations. An environmental covenant is required for the property to address potential exposure risk. The environmental covenant shall also include any long term obligations for Water Gremlin at the site.
2. Regarding Section 8.0 Conclusions Item 2, MPCA staff agree that the stormwater ponds should be dredged to remove lead-impacted sediment. The lead-impacted sediment shall be properly managed and disposed of at a permitted facility. Confirmation sampling shall be conducted to confirm removal of the lead impacted sediments. MPCA staff do not agree that no additional evaluation for lead-impacted sediments are recommended. Additional sediment samples for lead are required on the west side of Otter Lake Road. Additional sediment samples are required for 1,4-dioxane.
3. MPCA staff do not agree with Section 8.0 Conclusions Item 3 that no additional surface water sampling for lead is required. Sampling for lead in surface water is required west of Otter Lake Road paired with the sediment samples referenced in item 2 above. Additional surface water samples for lead are also required for the stormwater ponds in conjunction with confirmation lead sampling for the dredging activities referenced in item 2 above. Additional surface water samples are required for 1,4-dioxane.
4. MPCA staff agree with Section 8.0 Conclusions Item 4 that additional evaluation of groundwater-surface water interactions are required during non-frozen months to evaluate seasonal variability. The MPCA will require the use of pressure transducers for continuous water level measurements to evaluate these interactions.
5. MPCA staff agree with Section 8.0 Conclusions Item 5 and will review and comment on the vapor mitigation information under separate cover.
6. MPCA staff agree with the action item stated in Section 8.0 Conclusions Item 6 that additional assessment is required for the deeper confined aquifer for VOC impacts. To confirm vertical extent of contamination,

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lead and 1,4-dioxane samples are required in the deeper confined aquifer wells. Minor rewording is required on this item as noted in the pdf.

7. MPCA staff agree that additional investigation is required in both the shallow unconfined aquifer and deeper confined aquifer for 1,4-dioxane as stated in Section 8.0 Conclusions Item 7. MPCA staff agree that a permanent monitoring well network on the north campus property is required but requires additional temporary wells be installed on the south side of Lambert Creek to determine extent and magnitude of 1,4-dioxane off-site.
8. Water Gremlin Company is required to sample for 1,4-dioxane in the on-site soils.
9. As required under a separate cover, Water Gremlin Company is required to complete a receptor survey to identify receptors at risk for 1,4-dioxane. Once the receptor survey is complete, additional work related to private or municipal water wells may be required. The MPCA will review the receptor survey and coordinate the sampling requirements under separate cover.
10. The SRI Report identifies the South Campus owned and operated by Water Gremlin Company. Section 2.2 states that there was a research and development laboratory located within the facility where solvents and lead were used, as well as, where waste was generated. This is a recognized environmental condition. Water Gremlin Company is required to investigate all environmental media at the South Campus.
11. Changes to the SRI Report to address comments made on the PDF version of the document are required, including clarification requests as noted.
12. An updated version of the SRI Report is required for MPCA review and approval by April 10, 2020.
13. A work plan for a supplement remedial investigation is required for MPCA review and approval by April 10, 2020.

Extent and magnitude have not been determined for: lead contamination in sediments, surface water, and deep groundwater; 1,4-dioxane contamination in surface water, sediment, soil, shallow groundwater, and deep groundwater; and, VOC contamination in deep groundwater. Additional investigations are required as detailed in the above comments and a supplemental remedial investigation work plan is required.

MPCA staff is available to meet with you to discuss the technical contents of this letter as well as the plan for ongoing site work. Please contact me at michael.ginsbach@state.mn.us or 651-757-2329 with any questions. Your continued cooperation is appreciated.

Sincerely,

Michael Ginsbach

This document has been electronically signed.

Michael Ginsbach, Hydrologist
Remediation Division

MG/TG:jmp

cc: Carl Dubois, Water Gremlin Company (electronic)
Denise L' Allier-Pray, Water Gremlin Company (electronic)
Shane Waterman, Wenck (electronic)
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