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August 21, 2019

Cathy Stepp  
Regional Administrator  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Mail Code R-19J  
Chicago, IL 60604-3507

RE: State of Minnesota's concurrence for the United States Environmental Protection Agency to add the Highway 100 and County Road 3 Groundwater Plume Site (SEMS ID: MNN000506121) to the National Priorities List

Dear Cathy Stepp:

The State of Minnesota concurs with the United States Environmental Protection Agency (EPA) that the Highway 100 and County Road 3 Groundwater Plume Site in the City of Edina and City of St. Louis Park, Hennepin County, Minnesota (SEMS ID: MNN000506121) should be proposed to the National Priorities List (NPL), pursuant to authority under Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9605. The groundwater contaminant plume consists of tetrachloroethylene (PCE), trichloroethylene (TCE), cis-dichloroethylene (DCE), and vinyl chloride (VC). Impacts have been identified in St. Louis Park municipal wells SLP4 and SLP6, as well as Edina municipal wells E2, E7, E13, and E15. Concentrations in well E7 exceeded both Minnesota Department of Health (MDH) health-based guidance values and EPA safe drinking water criteria. Concentrations detected in wells SLP4, SLP6, E2, E7, E13 and E15 have exceeded the MDH health-based water guidance values. While treatment has previously been installed on the drinking water wells to ensure safe drinking water to the communities' residents, it is a high priority to continue investigations and remediation of the associated groundwater contamination plume to protect human health and the environment.

Initial investigation actions completed by the Minnesota Pollution Control Agency (MPCA) have identified potential contamination sources; however, it has not been determined if the contamination sources have impacted the municipal wells. Subsurface contamination, hydrogeology, and complex glacial and bedrock geology need additional characterization. Extensive additional investigation and remediation is needed to identify and address the contaminant source(s) and the rest of the groundwater contamination plume. MPCA believes that the site is eligible for listing on the National Priorities List (NPL) due to the impact of the municipal water supplies. The MPCA believes it is essential to pursue cleanup of this contamination and restore this valuable groundwater resource.

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The MPCA and EPA have been working with local leaders in the communities of Edina and St. Louis Park to address the contamination. The Superfund process generally provides significant opportunity for community involvement. I expect a high level of community involvement and encourage the EPA to continue coordinating with local officials, local and State health departments, and the MPCA to keep the community informed and to work with community leaders to coordinate the investigation and cleanup activities.

Should the site be listed on the NPL, the MPCA will continue to assist the EPA in making the necessary decisions to protect public health and the environment in cities of Edina and St. Louis Park. The MPCA will work with the EPA to develop a Cooperative Agreement that will outline roles and responsibilities for each of the two agencies for site oversight.

If you have any questions, please feel free to contact Kathy Sather, Director of MPCA Remediation Division, at 651-757-2691.

Sincerely,



Laura Bishop  
Commissioner

LB/KS/JJ:ah/nld

cc: The Honorable James Hovland, Mayor, City of Edina  
The Honorable Jack Spano, Mayor, City of St. Louis Park  
Scott Neal, City Manager, Edina  
Tom Harmening, City Manager, St. Louis Park  
Assistant Commissioner Kirk Koudelka, MPCA (electronic)  
Carmen Netten, Attorney, MPCA (electronic)  
Kathy Sather, MPCA (electronic)  
Jamie Wallerstedt, MPCA (electronic)  
Crague Biglow, MPCA (electronic)