

May 14, 2021

Cheryl Newton  
Acting Regional Administrator  
USEPA Region 5  
77 West Jackson Boulevard  
Mail Code R-19J  
Chicago, IL 60604-3507

RE: State of Minnesota's Concurrence Letter for National Priorities List (NPL) Listing  
Southeast Hennepin Groundwater and Vapor Site, Minneapolis, Minnesota  
MPCA Site ID: SR0001401

Dear Cheryl Newton:

The state of Minnesota concurs with the United States Environmental Protection Agency (EPA) that the Southeast Hennepin Groundwater and Vapor site (Site) in the City of Minneapolis, Hennepin County, Minnesota (SEMS ID: MNN000506043) 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 and vapor plume consists of trichloroethylene (TCE). TCE has been detected in groundwater samples collected from the shallow water table aquifer and in the deeper Quaternary aquifer at concentrations above the Minnesota Department of Health (MDH) Health Risk Limits (HRL) and EPA Maximum Contaminant Levels (MCL). Risk of exposure to contaminated groundwater is limited due to property connections to the Minneapolis municipal system sourced from the Mississippi River. However, the shallow TCE contaminated groundwater is a source of TCE vapors that can pose a human health risk to occupants of buildings in the area.

TCE has been detected in sub-slab vapor samples at concentrations requiring building vapor mitigation (greater than the 33X Minnesota Pollution Control Agency (MPCA) Intrusion Screening Values (ISV)) at more than seventeen commercial and three residential properties, and a charter school within the Site. The full extent of the TCE vapor plume has not been defined. The MPCA has installed vapor mitigation systems at all of the residential properties, and building owners have installed vapor mitigation systems at the charter school and many of the commercial properties. It is essential that investigation and remediation of the source(s) of contamination to the groundwater and vapor impacts continue in order to protect human health and the environment.

Initial investigation actions completed by the MPCA have identified potential contamination sources; however, responsible parties have not been determined for the contamination at the Site. Additional investigation is necessary to determine the extent of the groundwater and vapor plumes, and to

Name: EPA - MPCA Site ID: SR0001401

Page 2

Date: May 14, 2021

characterize potential contamination sources to allow for future remediation of the source areas. The MPCA believes that the site is eligible for listing on the NPL due to the extent of vapor impacts on commercial and residential properties. The MPCA believes it is essential to pursue investigation and remediation of groundwater and vapor impacts to ensure that human health and the environment are fully protected.

The MPCA and EPA have been working with local leaders of the community in Minneapolis 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 the city of Minneapolis. 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 Kirk Koudelka, Assistant Commissioner, at 651-757-2241.

Sincerely,

Laura Bishop  
Commissioner

cc: Assistant Commissioner Kirk Koudelka, MPCA (electronic)  
Greta Gauthier, Assistant Commissioner, MPCA (electronic)  
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