



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

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July 16, 2014

Mr. Larry Deeney
General Mills, Inc.
One General Mills Boulevard
Minneapolis, MN 55426-1347

RE: General Mills Superfund Site, 2010 East Hennepin Avenue, Minneapolis
MPCA Project Number SR3
DRAFT Vapor Intrusion Pathway Investigation and Feasibility Study Work Plan

Dear Mr. Deeney:

The Minnesota Pollution Control Agency (MPCA) has completed its review of the draft Vapor Intrusion Pathway Investigation and Feasibility Study Work Plan (Work Plan) for the General Mills Superfund Site (Site). The Work Plan, dated June 2014, was prepared and submitted on behalf of General Mills by Barr Engineering Company.

The Work Plan is a requirement of the Response Action Plan Modification #1 (RAP) document finalized in March 2014. The RAP outlines the required elements of the Work Plan which include plans for:

- Additional soil, soil gas and groundwater testing to define the area of contamination;
- Identifying and evaluating alternatives for cleaning up the remaining contamination that is creating the vapor intrusion risk; and
- A schedule for completing these activities.

The Work Plan does address additional soil, soil gas and groundwater testing for trichloroethylene (TCE), but does not provide plans for identifying and evaluating alternatives for cleaning up the remaining contamination that is creating the vapor intrusion risk. Therefore, the Work Plan is not approved.

Please provide a revised Work Plan on or before August 18, 2014. The revised draft must include enhancements addressing the comments listed in the attachment. The revised draft must also include plans for identifying and evaluating alternatives for cleaning up the remaining contamination that is creating the vapor intrusion risk.

If you have any questions regarding this letter, please contact either me at 651-757-2627, or Fred Campbell at 651-757-2260.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward P. Olson".

Edward P. Olson, CEP
Project Manager
Site Remediation and Redevelopment Section
Remediation Division

EPO:ls

cc: Tom Frame, City of Minneapolis
John Evans, Hennepin County
Sara Ramsden, Barr Engineering

ATTACHMENT
Comments

Proposed VI Pathway Investigation –

Text should be revised to include soil vapor sample collection at all soil boring locations.

Provide the rationale for determining well locations, sample types and depths, well screen lengths, well screen placement for shallow and deep wells, and analytical parameters.

Full VOC list parameter reporting is required for all soil, soil gas and groundwater investigation activities. An evaluation of analytical reporting schedule will be made after the first sampling event.

The nested wells proposed in the former absorption pit area should be installed in the exact location or slightly down-gradient of the former absorption pit. In addition, the well nest in the former absorption pit area should consist of three wells. Where feasible, this could include a third, double-cased well screened entirely within the clay layer.

Further investigation of the Site's northwest area is to include two soil borings and two soil gas probes advanced in vicinity of the concrete pad historically used for bulk chemical storage tanks and drum storage (i.e. just southeast of existing monitoring well 14), and should include collection of full list VOC soil, groundwater and soil vapor samples.

The proposed two rounds of groundwater samples in the glacial drift are to initiate the investigation; yet, additional groundwater monitoring will be required. A determination regarding additional groundwater monitoring will be made once results for the initial two rounds of groundwater sampling have been submitted and reviewed.

Sentinel Monitoring Network

A sentinel monitoring network is required and should surround the vapor mitigation area established in the Site documents. Additional sentinel monitoring points are needed in two areas: southwest and northeast of the vapor mitigation area.

Additional vapor monitoring points are needed in the center of the vapor mitigation area.

Provide construction details for the proposed co-located/adjoining groundwater and vapor monitoring ports. For example, identify vapor sampling ports as temporary or permanent, and the applicable field SOP.

The approximate groundwater TCE and vapor plume maps, as established in the Site documents, are to be included in the Work Plan.

The off-Site groundwater monitoring network needs to include additional monitoring wells in the vicinity of the leading edge of the TCE groundwater plume to confirm the current areal extent of contamination. For example, additional wells should be placed near the intersections of 13th Avenue SE and 8th Street SE and of 17th Avenue SE and Elm Street.

Project Schedule

More specificity is needed in the project schedule. Provide detail as to tasks to be completed including planned start and end dates. For example, provide the proposed timing for submittals such as the QAPP and the VI Pathway Investigation and Feasibility Study Report.