

October 31, 2017

Mr. Kenneth Kerns  
University Health and Safety  
University of Minnesota  
W-140 Boynton Health Service  
Minneapolis, MN 55455

RE: UMore Park/Formal Gopher Ordnance Works Site, Rosemount  
MPCA Project Number SR374  
Remedial Investigation Report Approval

Dear Mr. Kerns:

The Minnesota Pollution Control Agency (MPCA) staff in the Superfund Program has reviewed the Remedial Investigation Report (RI Report) submitted for the University of Minnesota Outreach, Research, and Education (UMore) Park/Formal Gopher Ordnance Works site, located in Rosemount, Dakota County (the Site). The Report, dated May 2017, was prepared and submitted on your behalf by Barr Engineering Company (Barr).

The approximately 8,000-acre Site has been occupied by a U.S. government-owned, contractor-operated ordnance works facility in the 1940s, and other various light industrial, commercial, and agricultural businesses. UMore East Park is established in the northern portion of the Site, and the Vermillion Highlands Research, Recreation, and Wildlife Management Area (Vermillion Highlands) established in the southern portion.

The Report summarizes remedial investigation activities completed in 2016 targeting 10 sub-sites identified for further investigation. The scope of work was based on a series of investigations completed at the Site over the past 15 years, and developed under an agreement between the MPCA and U of M dated March 11, 2016. Development of the work plans included participation with the local units of government and the public.

The U of M implemented the MPCA-approved remedial investigation work plan (Barr dated April 2016) in conjunction with supporting MPCA-approved documents including a Sampling and Analysis Plan (Barr dated June 2016), a Quality Assurance Project Plan (QAPP) (by Barr dated April 2016), a Supplemental Field Sampling Plan (Barr dated October 2016), and a Revised QAPP (Barr dated September 2016).

The Report identified arsenic, lead, mercury, polyaromatic hydrocarbons, and polychlorinated biphenyls at concentrations exceeding the MPCA Tier I soil reference values as the primary constituents of concern at the Site. These contaminants, along with dinitrotoluene, are widely distributed and detected across the Site.

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The Report recommended additional evaluations be conducted at the Site in support of feasibility studies or risk assessments to determine appropriate response actions based on proposed future land use. It should also be noted that the U of M has conducted additional assessments and actions at the Site, which were geared towards asbestos releases/abatement, and physical hazards, and were not included in the scope of work for this RI Report.

MPCA Superfund project staff sent the U of M an electronic message dated May 3, 2017, which included comments relative to bolstering the Report to create a more complete record, to clarify the risk screening criteria presentation, and to communicate that the groundwater investigation was limited to support the conclusion of recommending closing the groundwater pathway evaluation. The U of M revised the draft RI Report based on MPCA comments, and with the modifications made to the RI Report, dated May 2017, the MPCA hereby approves the revised Report.

With approval of the May 2017 RI Report, Superfund remedial investigation activities at the Site are substantially complete. As noted earlier, appropriate feasibility studies and/or risk evaluations are necessary to determine appropriate response actions that may be needed. Additional data collection may be needed to support these additional studies.

One potential action the MPCA and U of M have discussed is the establishment of an Environmental Covenant for release-impacted areas of UMore East. As you know, a conservation easement is in place for the Vermillion Highlands area of the Site to ensure appropriate management of that portion of the Site. Given the growing interest in redevelopment of impacted areas in UMore East, an Environmental Covenant for that area of the Site is a reasonable action for long-term management. Therefore, the MPCA requests the U of M engage in additional discussions regarding an Environmental Covenant for UMore East.

The MPCA appreciates the efforts taken by the U of M to not only further define the extent of releases that have occurred at the Site, but also to address asbestos and physical hazard abatement, and to work towards finding solutions towards beneficial reuse of the property.

If you have any questions about this letter, please contact Edward Olson, at 651-757-2627 or email at [edward.olson@state.mn.us](mailto:edward.olson@state.mn.us), or Chris Formby, at 651-757-2712 or email at [christopher.formby@state.mn.us](mailto:christopher.formby@state.mn.us).

Sincerely,



Gary L. Krueger

Supervisor

Site Remediation & Redevelopment Section

Remediation Division

GLK:csa

cc: Ann Wright, U.S. Corps of Engineers  
Jim Eidem, Barr Engineering  
George Fisher, Dakota County Environmental Resources  
Kim Lindquist, City of Rosemount  
Rick Kubler, Gray Plant Mooty

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