June 17, 2016

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

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

Dear Mr. Kerns:

The Minnesota Pollution Control Agency (MPCA) has completed its review of the Remedial Investigation Work Plan (RIWP) (Barr Engineering, April, 2016) for additional investigation at the UMore Park/Gopher Ordnance Works site (the Site). The RIWP was developed following the Remedial Investigation (RI) scope of work developed by the University of Minnesota (U of M) with technical input from the U.S. Army Corps of Engineers (USACE). The scope of the current work plan was built upon previous investigations conducted at the Site by both the U of M and USACE, and focuses on 10 additional or remaining areas for investigation as identified by those previous investigations. The primary objective of the RIWP is to substantially complete remedial investigation activities regarding releases of hazardous substances and petroleum that occurred from the construction, operation and demolition of the former Gopher Ordnance Works facility. The investigative work scope does not include Site sub-parcels separately managed under the US EPA Superfund Program and National Priorities List.

The U of M submitted a draft RI work plan in February 2016, for which MPCA Superfund staff provided preliminary comments on March 25, 2016. The U of M revised the draft work plan based on those MPCA comments and subsequently published a notice in the State Register on April 11, 2016 to provide the opportunity for public comment. The U of M also held a public meeting at the Rosemount Community Center on April 26, 2016 to provide an overview of the planned investigation.

Two comment letters were received by the MPCA during the public comment period, one from the City of Rosemount and the other from the Dakota County Environmental Resources Department. Based on review of comments submitted, the U of M on May 31, 2016 submitted proposed revisions to the April 2016 RIWP, to address additional sampling activities recommended. The April 2016 RIWP, as amended, will be conducted in two stages over the summer/fall 2016. The U of M will consult with the MPCA regarding the planned, stage two activities and possible revisions based on sample results from stage one. The U of M intends to complete sampling activities and prepare an RI Report by the end of December 2016. A subsequent public meeting is planned to provide an overview and results of investigation activities.

The RIWP is hereby approved with the additional requirement that any sample plan modifications or schedule changes be promptly communicated with the MPCA. The U of M has also completed a Sample and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP by Barr dated April 2016), which has been approved by the
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MPCA. Both the RIWP and SAP/QAPP have been completed to meet MPCA Superfund Program guidance established under Minnesota Environmental Response and Liability Act and is consistent with U.S.EPA Superfund Program guidance for completing Remedial Investigations under Comprehensive Environmental Response, Compensation, and Liability Act. In addition, as per previous MPCA and stakeholder comments, the planned RI Report to be completed by the U of M shall be a site-wide RI report which pulls together past investigative activities conducted by both the U of M and USACE, into one comprehensive RI report.

The MPCA appreciates the efforts being taken by the U of M to address releases and hazards that exist at the Site. If you have any questions, please contact either me at 651-757-2509 or gary.krueger@state.mn.us, or Edward Olson, at 651-757-2627 or edward.olson@state.mn.us, or Chris Formby at 651-757-2712 or christopher.formby@state.mn.us.

Sincerely,

Gary L. Krueger  
Supervisor  
Site Remediation and Redevelopment Section  
Remediation Division

cc: David Joncs, MDH  
Georg Fischer, Dakota County  
William Droste, Mayor, City of Rosemount  
Janet Dalgleish, U of M  
Jim Eidem, Barr Engineering