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WENCK ASSOCIATES, INC.

MEMORANDUM

TO:	Mr. Tom Barounis, U.S. EPA, Region V (3 copies) Ms. Dagmar Romano, MPCA (3 copies)	
FROM:	Keith W. Benker, Wenck Associates, Inc.	
RE:	Final TCAAP Five-Year Review Report Wenck File #0003-60-01	
C:	 Mr. Marty McCleery, SIOTC-EV, TCAAP (4 copies) Mr. Pete Rissell, AMSIO-IBI-REST, IOC (1 copy) Mr. Cyril Onewokae, SFIM-AEC-ERO, AEC (1 copy) Mr. Matt McAtee, MCHB-TS-HER, CHPPM (1 copy) Mr. Ken Christenson, CENWO-PM-HA, USACE-Omaha District (4 copies) Mr. Dave Gosen, Alliant Techsystems Inc. (2 copies) Mr. Robin Rockney, Alliant Techsystems Inc. (1 copy) Mr. Jim Persoon, Alliant Techsystems Inc. (2 copies) Mr. Dan Sola, CRA (1 copy) Ms. Teri Perry, Barr Engineering (1 copy) Mr. John Chinnock, Stone & Webster (1 copy) Mr. Adam Gordon, Montgomery Watson (1 copy) 	

DATE: September 24, 1999

Enclosed is the <u>Final</u> TCAAP Five-Year Review Report. Mr. Marty McCleery (TCAAP Remedial Project Manager) will be distributing a separate cover letter and the Consistency Letter.

The final report includes the revisions proposed in my Memorandum dated August 12, 1999, which were agreed to (with one exception) by the USEPA and MPCA at the TRC Meeting on August 31, 1999.

The exception was MPCA Comment No. 6, in regard to the retention pond at the CAMU and management of VOC-contaminated soil. The MPCA suggested a different revision in their letter dated September 8, 1999. Subsequent communication between Ms. Dagmar Romano (MPCA) and Mr. Ken Christenson (USACE) on September 20-21, 1999, resulted in the MPCA withdrawing their initial comment since the VOC issue arose after the timeframe covered by the Five-Year Review. Hence, the final report is the same as the draft report in regard to this matter.

If you have any questions, please call me at (612) 479-4206.

INSTALLATION RESTORATION PROGRAM TWIN CITIES ARMY AMMUNITION PLANT

FIVE-YEAR REVIEW REPORT OF THE FINAL REMEDY FOR THE NEW BRIGHTON/ARDEN HILLS SUPERFUND SITE

Distribution is limited to U.S. Government Agencies only for protection of privileged information. Other requests for the documents must be referred to:

> Commander Twin Cities Army Ammunition Plant 4700 Highway 10, Suite A Arden Hills, Minnesota 55112-3928

Prepared for:

Commander Twin Cities Army Ammunition Plant 4700 Highway 10, Suite A ATTN: SIOTC-EV Arden Hills, Minnesota 55112-3928

SEPTEMBER 1999 FINAL REPORT U.S. ARMY CORPS OF ENGINEERS WENCK ASSOCIATES, INC.

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Alliant	- Alliant Techsystems Inc.
APR	- Annual Performance Report
ARAR	- Applicable or Relevant and Appropriate Requirements
CAMU	- Corrective Action Management Unit
CERCLA	- Comprehensive Environmental Response, Compensation, and Liability Act
CRA	- Conestoga-Rovers & Associates, Inc.
EE/CA	- Engineering Evaluation/Cost Analysis
ESD	- Explanation of Significant Difference
FFA	- Federal Facilities Agreement
FY	- Fiscal Year
GAC	- Granular Activated Carbon
gpm	- Gallons per Minute
IRA	- Interim Remedial Action
MCES	- Metropolitan Council Environmental Services
MDH	- Minnesota Department of Health
MERLA	- Minnesota Environmental Response and Liability Act
MPCA	- Minnesota Pollution Control Agency
NB/AH	- New Brighton/Arden Hills
NBM	- New Brighton Municipal
NPL	- National Priorities List
O&M	- Operation and Maintenance
OU	- Operable Unit
PCBs	- Polychlorinated Biphenyls
PGAC	- Permanent Granular Activated Carbon
PGRS	- Plume Groundwater Recovery System
POTW	- Publicly-Owned Treatment Works

List of Acronyms (Cont.)

RCRA	- Resource Conservation and Recovery Act
ROD	- Record of Decision
SDWA	- Safe Drinking Water Act
SVE	- Soil Vapor Extraction
SWCA	- Special Well Construction Area
TCAAP	- Twin Cities Army Ammunition Plant
TGRS	- TCAAP Groundwater Recovery System
μ g/l	- Micrograms per liter
USAEC	- U.S. Army Environmental Center
USEPA	- U.S. Environmental Protection Agency
VOCs	- Volatile Organic Compounds
Wenck	- Wenck Associates, Inc.

1.0 Introduction

A five-year review was performed for the New Brighton/Arden Hills, Superfund (NB/AH) Site, which consists of three operable units. Records of Decision were signed between 1992 and 1997. Operable Unit 3 triggered this five-year review. Although five-years has not elapsed for all operable units, the decision was made to review all three operable units at the same time for the sake of efficiency and completeness. Data available before October 1998 was primarily used for the five-year review.

This report is organized into the following sections:

- I. Introduction
- II. Operable Unit 1
- III. Operable Unit 2
- IV. Operable Unit 3
- V. Other Removal Actions
- VI. Schedule for Next Five-Year Review
- VII. Approvals

1.1 AUTHORITY AND PURPOSE

The U.S. Army performed this statutory five-year review under Section 121(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), for review by the U.S. Environmental Protection Agency (U.S. EPA), Region 5, and the Minnesota Pollution Control Agency (MPCA). The purpose of a statutory five-year review is to evaluate whether a completed remedial action remains protective of human health and the environment at sites where hazardous waste remains on-site at levels that do not allow for unlimited use and unrestricted exposure. The Type I review conducted for this site, as requested by the U.S. EPA,

is applicable to a site at which construction is generally complete and there are no factors which suggest a higher level of review is necessary.

1.2 DOCUMENTS CONSULTED

The primary references used in preparation of this report were:

- Record of Decision (ROD) Groundwater Remediation, Operable Unit 1, September 1993
- Record of Decision Operable Unit 2, October 1997
- Record of Decision Groundwater Remediation, Operable Unit 3, September 1992
- TCAAP Fiscal Year 1998 (FY 1998) Annual Performance Report (APR), Draft, February 1999
- TCAAP FY 1997 APR, August 1998
- TCAAP Annual Monitoring Reports FY 1994, 1995, and 1996

1.3 SITE BACKGROUND

From 1941 to 1976, the mission of the Twin Cities Army Ammunition Plant (TCAAP) was the production of ammunition for the United States during World War II, the Korean Conflict, and the Southeast Asia Conflict. Today TCAAP is in modified caretaker status and is implementing a comprehensive environmental cleanup program under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), and Minnesota Environmental Response and Liability Act (MERLA). The U.S. Army, Department of Defense contractor Alliant Techsystems Inc. (Alliant), the U.S. Army Reserves, and the Minnesota National Guard operate on the installation.

The 2,340-acre installation is located on top of the Prairie du Chien-Jordan aquifer, the Twin Cities metropolitan area's major source of drinking water. The site is a rare "prairie pothole" wetland, is on a Mississippi River tributary, hosts a state fishery site, and supports an abundant number of wildlife species, including some that are threatened. TCAAP lies in a metropolitan area with a population of three million and is surrounded by five cities that are suburbs of the Minneapolis-St. Paul area. It is located in northwest Ramsey County and is in Minnesota's Fourth Congressional District. TCAAP's location is shown on Figure 1-1.

During the approximately 22 years of ammunition production, TCAAP generated industrial wastes that were disposed of using the accepted practices of the times, which included on-site dumping, burial, and open-burning. Between 1978 and 1982, contamination of the regional aquifer was discovered and it was determined that 14 different source areas at TCAAP contained groundwater contamination, soil contamination, or both. These contaminants included volatile organic compounds (VOC) commonly used as industrial solvents or degreasers (especially trichloroethene), polychlorinated biphenyls (PCBs), and ammunition-related heavy metals. The drinking water supply to three communities, with a total population of approximately 33,000, was directly impacted by VOCs.

Based upon the information gathered between 1978 and 1982, TCAAP was placed on the National Priorities List (NPL) in September 1983 and was designated as the New Brighton/Arden Hills Superfund Site. It is ranked as the number one Superfund site in Minnesota. The Superfund site consists of TCAAP and those areas outside of the plant boundaries that are affected by contamination from the plant. The TCAAP "site" has been divided into three operable units, principally due to the nature and extent of the contaminated groundwater plume on and off TCAAP. The plume is approximately 2-miles wide and 6-miles long.

The three operable units are depicted on Figure 1-2 and are defined as follows:

- Operable Unit 1 (OU1) consists of the north portion of the off-TCAAP contaminated groundwater plume. A Record of Decision (ROD) was issued for OU1 in September 1993.
- Operable Unit 2 (OU2) consists of on-TCAAP soil and groundwater contamination within 14 source areas designated as Sites A, B, C, D, E, F, G, H, I, J, K, 129-3, 129-5, and 129-15 (see Figure 1-3). Site J has already been closed and Site F closure is pending. A ROD was issued for OU2 in October 1997.
- Operable Unit 3 (OU3) consists of the south portion of the off-TCAAP contaminated groundwater plume. A ROD was issued for OU3 in September 1992.

<u>OU1</u>

After TCAAP-related contamination was found in their drinking water supply, a permanent groundwater treatment system was completed for the City of St. Anthony in December 1990. In December 1992, the U.S. Army provided municipal water supply hookup at the Lowry Grove Trailer Park.

The U.S. Army provided a permanent groundwater treatment system for the City of New Brighton in June 1990: the Permanent Granular Activated Carbon (PGAC) treatment facility. Since that time, the system has treated over 6 billion gallons of contaminated groundwater, has removed over 11,000 pounds of VOC, and has served as a municipal water source for New Brighton residents.

In 1995, the U.S. Army provided the City of New Brighton with funding for the permanent groundwater treatment system modifications required to implement the terms of the OU1 ROD. The U.S. Army also provided the Arden Manor Trailer Park with a municipal water line hookup to replace a contaminated supply well.

<u>OU2</u>

Some soil cleanup activities have already been conducted at the installation. Interim Remedial Action (IRAs) at Sites D and G, implemented in January 1986 and February 1986 respectively, included the installation of soil vapor extraction (SVE) systems at both sites to remove VOCs from the soils, effectively reducing VOC migration to the groundwater. Since startup, the SVE systems at Sites D and G have removed more than 220,000 pounds of VOCs from the soil. In September 1989, the thermal treatment of 1,400 cubic yards of PCB-contaminated soil from Site D was completed. In 1995, the installation completed an innovative soil washing and soil leaching action as part of the cleanup of Site F. More than 25,000 tons of metal-contaminated soil were treated over a period of three years. Site J is a portion of TCAAP's underground sanitary sewer that was investigated and cleaned out. The Final Site J Closure Report (1994) documented the absence of contaminants above background levels and no further action was recommended.

Many actions have also been undertaken to clean up the contaminated groundwater. In 1986, groundwater extraction treatment systems were installed at Sites I and K as IRAs. In October 1987, the installation constructed the Boundary Groundwater Recovery System (BGRS) to contain and treat VOC-contaminated groundwater at the installation's southwest boundary. In January 1989, the system was modified and expanded and became the TCAAP Groundwater Recovery System (TGRS). To date, this system has treated over 13 billion gallons of contaminated water and removed over 167,000 pounds of VOCs.

In September 1988, the installation conducted an IRA at Site A to treat shallow VOC-contaminated groundwater at the north boundary. In 1994, the installation replaced the Site A IRA remedy with a boundary plume containment system designed to prevent the off-post migration of VOCs in shallow groundwater. To date, this system has pumped over 70 million gallons of contaminated groundwater containing over 25 pounds of VOCs.

<u>OU3</u>

In April 1994, the OU3 Plume Groundwater Recovery System (PGRS) was completed. To date, this system has treated over 1.8 billion gallons of water, removing over 100 pounds of VOCs. Alliant is responsible for the capital costs and operation and maintenance costs for this system.

In July 1994, the OU1/OU3 New Brighton/Fridley municipal drinking water interconnection became operational. This system allows New Brighton to pump water, treated by the PGAC and the PGRS and not needed for its municipal use, to the City of Fridley for use in its municipal water system.

2.0 Operable Unit 1 (OU1)

2.1 REMEDIAL ACTION OBJECTIVES

The objective of the OU1 remedial action is to protect human health and the environment through containment of the north plume until restoration of the aquifer is completed. The point of compliance for containment is the containment boundary created by the combined pumping of New Brighton wells NBM #4, NBM #14, and NBM #15. In addition to the containment component, protection of human health is also facilitated through the remedy components of GAC treatment of extracted groundwater, offering an alternate water supply to owners of impacted private wells, and designation of the Minnesota Department of Health (MDH) Special Well Construction Area (SWCA).

A human health risk assessment for TCAAP was performed by the USEPA in 1991. The risk assessment evaluated the carcinogenic and non-carcinogenic risks associated with exposure to contaminated groundwater through exposure pathways of ingestion, inhalation during showering, and absorption through the skin during showering or bathing. Estimated increases in carcinogenic and non-carcinogenic risks that would result from exposure to contaminated groundwater exceeded acceptable levels as defined by the USEPA and MPCA. The remedial action achieves substantial risk reduction by eliminating private well users, containing the plume, and providing effective treatment of the extracted groundwater prior to its beneficial use for municipal water supply.

2.2 SUMMARY OF THE SELECTED REMEDY

For OU1, the components of the selected remedy are:

- Providing an alternative water supply to residents with private wells within the north plume.
- Implementing drilling advisories that would regulate the installation of new private wells within the north plume as a SWCA.
- Extracting groundwater at the containment boundary in the north plume near County Road E.
- Pumping the extracted groundwater to the PGAC water treatment facility in New Brighton for removal of VOCs by a pressurized GAC system.
- Discharging all of the treated water to the New Brighton municipal distribution system.
- Monitoring the groundwater to verify the effectiveness of the remedy.

2.3 SITE VISIT

A site inspection was conducted on March 16, 1999, by the USEPA, MPCA, U.S. Army, Alliant Techsystems, and other parties as shown on the list of attendees presented as Appendix A.1. A site inspection checklist for OU1 was completed and is included as Appendix A.2. Much of the information was obtained prior to the site inspection through phone interviews and review of available documents, including the OU1 ROD and the FY 1998 APR. The nearly complete checklists were then verified as the site inspection was conducted and any data gaps or

modifications were discussed. (This approach was utilized for all site inspection checklists completed for this five-year review.)

The OU1 site inspection started with the PGAC water treatment facility, then the pumphouses for the three containment wells (NBM #4, NBM #14, and NBM #15). The treatment plant operator (Bob Hertenstein, City of New Brighton) and two people from the city's engineering consultant (Teri Perry and Greg Keil, Barr Engineering) were present to answer questions and guide the inspection. The plant was observed to be well maintained. Photographs of the plant are included as Appendix B. The computerized recordkeeping system for the OU1 groundwater recovery system was demonstrated for the inspectors. (As a matter of convenience, the recordkeeping system for the OU3 groundwater recovery system was also demonstrated at that time.) Pumping records, effluent sampling results, maintenance information, and other data are routinely entered and can be viewed graphically to facilitate data analysis.

The most significant operational difficulty discussed at the site inspection was maintaining a balance between water demand (which naturally varies) and continual pumping of containment wells (which is ideally a continual, constant rate). The interconnection between City of New Brighton and City of Fridley municipal water systems that was completed in 1994 has helped in that this added water demand has allowed more consistent pumping from OU1 containment wells. Unfortunately, the interconnection has its own operational difficulties due to variation of water demand and differences in the chlorination systems of the two cities and has resulted in an operational learning curve. Given the learning curve for the interconnection and the very recent completion of the remedial action construction (August 1998), the OU1 containment wells have only been brought up to design operating level at about the time of this site visit.

2.4 **REMEDIAL ACTION RESULTS**

The status of remedial actions is summarized in Table 1-1.

The first remedy component, the alternate water supply program, has resulted in connection of one residence to an alternate water supply. As part of this program, eight impacted private wells have also been properly abandoned. Installation of two alternate water supply connections and two well abandonments is scheduled for FY 1999. After this work is completed, all known private wells needing an alternate supply and/or well abandonment will have been addressed (well owners who have been offered an alternate water supply and/or well abandonment but who refused to participate in this program are deemed to have been addressed).

The Special Well Construction Area (SWCA) designated by MDH satisfies remedy component #2 and is accomplishing its purpose of notifying water well installers of the contaminated groundwater in the area. Adjustments to the SWCA boundaries to more closely match the area of concern are anticipated to be completed in 1999.

Groundwater containment (remedy component #3) is being accomplished through continual pumping of wells NBM #4, NBM #14, and NBM #15. Well NBM #3 is designated as an alternate containment well if a primary well is temporarily out of service. Wells NBM #5 and NBM #6 are secondary alternates that will be used only when wells NBM #3 and NBM #4 are both out of service.

NBM #4 was an existing well and has been pumping throughout the period of this five-year review. NBM #14 and NBM #15 were constructed as part of the remedy and have only been pumping since December 1996 and March 1998, respectively. Since NBM #15 just started pumping in March 1998, evaluation of containment and optimum pumping for the "full-scale" system is currently in progress. Preliminary evaluation was discussed in the FY 1998 APR; however, additional operational evaluation will be performed. Figure 2-1 shows water level data, groundwater elevation contours, and approximate capture limits based on data from Summer 1998. Note that "Upper Unit 4" is a hydrogeologic unit (Prairie du Chien Group). The hydrogeologic units at this site are discussed in the FY 1998 APR and other TCAAP documents, and the reader is referred to these documents for detailed hydrogeologic information. The contours on Figure 2-1 clearly show the influence of pumping. Figure 2-2 shows the trichloroethene plume for OU1 and also for OU3 based on data from Summer 1998. The approximate capture boundary from Figure 2-1 is also shown on Figure 2-2. Pumping volumes and VOC mass removal for FY 1998 are shown in Table 2-1. Influent/effluent water quality data for the PGAC is shown in Table 2-2. Table 2-2 shows that over this five-year review period, NBM #4 has declined from total VOC levels of 214 to 386 μ g/l in 1994 to total VOC levels of 30 to 97 μ g/l in 1998. NBM #14 and NBM #15 have not been pumping long enough to show a clear trend.

Treatment of extracted groundwater in the PGAC water treatment facility (remedy component #4) continues to provide effective treatment prior to its discharge into the City of New Brighton municipal water distribution system (remedy component #5). PGAC effluent water quality is documented in Table 2-2, clearly showing the effectiveness of the treatment system. The treatment system is comprised of eight GAC vessels plumbed in parallel. Another eight GAC vessels are plumbed in series with the first eight to provide back-up treatment. Routine sampling occurs between the two sets of GAC vessels, such that when a detection occurs, a clean set of GAC vessels is present downstream of the sampling point. Upon detection, change-out of carbon in the lead vessels is conducted as soon as possible (typically about 1 month later). Upon changing carbon, the direction of flow is reversed so that the eight vessels with the new carbon become the downstream vessels (the "clean" vessels are always rotated into the downstream position).

Remedy component #6, groundwater monitoring, continues to be conducted to verify the performance of the remedy. Each fiscal year, a revolving, five-year monitoring plan is prepared by the U.S. Army and submitted to the USEPA and MPCA for approval. Although it covers five

years, it is submitted on an annual basis to allow for minor changes to be made which streamline or improve the quality of the monitoring data to be collected.

Based on OU1 groundwater quality data presented in the FY 1998 APR, two VOCs exceed the cleanup levels specified in the OU1 ROD: Trichloroethene and 1,1-dichloroethene. Trichloroethene concentrations range up to 530 micrograms per liter (μ g/l) with a cleanup level of 5 μ g/l. 1,1-Dichloroethene concentrations range up to 36 μ g/l with a cleanup level of 6 μ g/l.

2.5 ARARs REVIEW

The ARARs identified in the OU1 ROD (pages 19 and 20) are still applicable. No new ARARs have been identified that are believed to be applicable to the OU1 remedy. ARARs are being met with the exception of groundwater cleanup standards. The remedy provides containment of the VOC plume until aquifer restoration is complete (i.e., until cleanup standards are met).

2.6 **RECOMMENDED CHANGES TO REMEDIAL ACTIONS**

The only recommendation is to conduct additional evaluation of containment and optimum pumping rates. As discussed previously, since the OU1 containment wells were just reaching their design operating levels at the time of this site visit, evaluation of the "full-scale" system could not be completed in this five-year review.

2.7 STATEMENT OF PROTECTIVENESS

The components of the OU1 remedy remain protective of human health and the environment. The alternate water supply and well abandonment program, along with the SWCA, are mitigating potential risks associated with private wells. The PGAC is effectively providing a safe municipal water supply. As of March 1998, the third containment well is now pumping and influence from pumping is evident in the groundwater contour map. As discussed above, additional evaluation is to be conducted to ensure that adequate containment is being achieved.

3.0 Operable Unit 2 (OU2)

It should be noted that less than 1½ years has elapsed since signing of the OU2 ROD. Consequently, not all components of the remedies have been fully implemented. Therefore, this five-year review serves more as a status report on implementation. Substantial activity is planned for the next two years.

3.1 **REMEDIAL ACTION OBJECTIVES**

The objectives for OU2 are as follows:

- 1) <u>Shallow Soil Sites</u>:
 - a) *Sites A, C, E, H, 129-3, and 129-5:* Removal and off-site disposal of contaminated soils and ordnance/debris such that no hazardous substances remain on-site above health-based levels (specifically, the cleanup levels indicated in Table 1 of the OU2 ROD). Since Site A soils also have VOC contamination, an SVE system is also planned to be constructed in the latter part of 1999, which will provide in-situ treatment of soils to the required VOC cleanup levels.
 - b) *Sites B and 129-15:* Characterize the contents of the dumps to determine if any remedial actions are required.
- 2) <u>Deep Soil Sites (D and G)</u>: Attain soil cleanup levels for VOCs, as specified in Table 1 of the OU2 ROD (both within the area of influence of the existing shallow SVE systems and in the deeper soils, i.e., between the lower reach of existing SVE systems and the water table) and minimize infiltration of precipitation by maintaining existing site caps and surface controls. Also,

characterize Site D shallow soils (non-VOC contaminants may be present) and the Site G dump to determine if any remedial actions are required.

- 3) <u>Shallow Groundwater Sites (A, I, and K)</u>: Provide plume containment until groundwater cleanup levels are attained (as specified in Table 1 of the OU2 ROD).
- Deep Groundwater: Protect human health and the environment by providing plume containment until groundwater cleanup levels are attained (as specified in Table 1 of the OU2 ROD).

The human health risk assessment for TCAAP (USEPA 1991) found that carcinogenic and noncarcinogenic risks exceed acceptable levels at most sites in OU2. The exposure pathways that were evaluated were based on an industrial use scenario and included the following two assumptions:

- People who might be at risk from exposure to contaminated soil include TCAAP workers or occupants. Incidental ingestion and dermal contact are the only significant routes for receptors exposed to contaminants in surface soils at the site. During excavation activities, workers may be exposed to contaminants by inhaling vapors or dust, as well as through incidental ingestion and dermal contact.
- People who might be at risk from exposure to contaminated groundwater include TCAAP workers and local residents who rely on private drinking wells that extract contaminated groundwater. The potential pathways by which these receptors might be exposed include ingestion, inhalation during showering, and adsorption through the skin during showering or bathing with contaminated groundwater.

The remedial actions for Sites A, C, E, H, 129-3, and 129-5, when complete, will have removed contamination that exceeded the health-based cleanup levels presented in Table 1 of the OU2

ROD. Thus, the risks that were associated with these soils will have been eliminated for industrial property uses. This may or may not be the case for Sites B, 129-15, D, and G, depending on the results of additional characterization work and/or any additional remedial actions that may be conducted at these sites.

Containment of shallow groundwater plumes (Sites A, I, and K), and the deep groundwater plume minimizes risks by preventing further plume migration. The containment systems will remain in place until plume concentrations reach the specified cleanup levels (i.e., until the risks reach acceptable levels).

3.2 SUMMARY OF THE SELECTED REMEDY

The components of the selected remedy for OU2 are as follows:

- <u>Shallow Soil Sites</u>: Sites A, C, E, H, 129-3, and 129-5 have inorganic and organic contaminants above site cleanup goals. No contamination was found to exist at Site B. Unpermitted landfills, or dumps, exist within Sites A, B, E, H, and 129-15. Sites B and 129-15 are included solely as dumps. The selected remedy for the shallow soil sites will attain the site cleanup levels specified in the OU2 ROD and includes the following activities:
 - Identification/characterization of contaminated soil boundaries, surface and subsurface debris for Sites A, C, E, H, 129-3, and 129-5;
 - Excavation and sorting of hazardous and non-hazardous materials, debris and ordnance for Sites A, C, E, H, 129-3 and 129-5;
 - Removal and disposal of ordnance, debris and oversized material for Sites A, C, E, H, 129-3, and 129-5;

- On-site treatment (stabilization) of hazardous soils from Sites A, C, E, H, 129-3, and 129-5 in the TCAAP Corrective Action Management Unit (CAMU);
- Off-site disposal of contaminated soils above site specific cleanup goals from Sites A, C, E, H, 129-3, and 129-5;
- Backfill/regrade excavations on Sites A, C, E, H, 129-3, and 129-5;
- Restrict site access and use during remedy implementation;
- Five-year period of groundwater monitoring to verify no adverse remedy impacts at Sites A, C, E, H, 129-3, and 129-5; and
- Characterization of dumps at Sites B and 129-15 to determine their contents. If contents are found to be toxic, hazardous, or contaminated, then a remedy for the landfill will be utilized and documented through a post-ROD Amendment or Explanation of Significant Difference (ESD). If the contents are not toxic, hazardous, or contaminated, a no further action remedy would be employed.
- 2) <u>Deep Soil Sites (D and G)</u>: These sites have been impacted primarily by VOC contaminants at depths of 50 to 170 feet. Some additional shallow soil contaminants may exist at Site D. Site G also contains a dump. The selected remedy for these sites will attain the site cleanup levels specified in Table 1 of the OU2 ROD and includes the following activities:
 - Groundwater monitoring;
 - Restrict site access and use during remedy implementation;
 - Install and operate deep soil vapor extraction (SVE) systems with a modified shallow SVE system;
 - Evaluate and potentially use enhancements to the SVE systems;
 - Maintain existing site caps;
 - Maintain surface controls; and

- Following the completion of the SVE remediation of deep soils, characterize the Site D shallow soils and the Site G dump to determine the appropriate action.
- 3) Shallow Groundwater Sites (A, I, and K): These sites have been primarily impacted by VOCs. The selected remedy for Site A shallow groundwater will attain the site cleanup levels specified in Table 1 of the OU2 ROD and includes the following activities:
 - Groundwater monitoring to track plume migration and remedy performance;
 - Use of existing gradient control wells to contain the contaminant plume and remove mass;
 - Institutional controls to restrict new well installations and provide alternate water supplies and well abandonment as necessary;
 - Discharge of extracted groundwater to a publicly owned treatment works (POTW); and
 - Source characterization/remediation.

The selected remedy for Site I shallow groundwater will attain the site cleanup levels specified in Table 1 of the OU2 ROD and includes the following:

- Groundwater monitoring to track remedy performance;
- Use of an existing well to remove impacted Unit 1 groundwater;
- POTW discharge of extracted groundwater; and
- Additional characterization of the Unit 1 and Unit 2 soil and groundwater.

The selected remedy for Site K shallow groundwater will attain the site cleanup levels specified in Table 1 of the OU2 ROD and includes the following activities:

- Groundwater monitoring to track remedy performance;
- Installation of sentinel wells at the bottom of Unit 1 and to the top of Unit 3;
- Use of the existing interceptor/recovery trench to contain the plume and remove impacted groundwater;
- Treatment of extracted groundwater using air stripping;
- Discharge of treated groundwater to Rice Creek;
- Monitoring to track compliance with discharge requirements; and
- Additional characterization of the unsaturated Unit 1 soil.
- 4) <u>Deep Groundwater</u>: Includes the deep groundwater plume that underlies the southwestern potion of OU2 and originated primarily from Sites D, G, and I. The selected remedy for Deep Groundwater will attain the site cleanup levels specified in Table 1 of the OU2 ROD and includes the following activities:
 - Groundwater extraction to hydraulically contain the contaminated groundwater source area to the $5 \mu g/l$ trichloroethene concentration contour and optimize the removal of contaminants from the source area through pumping of selected wells;
 - Groundwater treatment using air stripping;
 - Discharge of treated groundwater to the on-site gravel pit;
 - Institutional controls to restrict access to contaminated aquifers and prevent exposure to contaminated groundwater;
 - Reviews of new and emerging technologies that have the potential to cost-effectively accelerate the timeframe for aquifer restoration. Reviews shall be performed by Army and reported on annually in

accordance with the consistency provisions of the TCAAP Federal Facility Agreement; and

• Groundwater monitoring to track remedy performance.

3.3 SITE VISIT

A site visit was conducted on March 16, 1999, by the USEPA, MPCA, U.S. Army, Alliant Techsystems, and other parties (see list of attendees presented as Appendix A.1). Inspection checklists are included in Appendices A.3 through A.8. Results of the site visits were as follows:

1) <u>Shallow Soil Sites</u>

Some of the sites were not readily accessible due to snow covered roads. The group stopped at Sites A and H and drove by Sites C, E, 129-3, and 129-15. The group also stopped at the CAMU. Potential plans for constructing a stormwater retention pond were briefly discussed. CAMU operation was conducted in 1998 without a separate retention pond and could continue in this manner if so desired. However, if the pond could improve the cost effectiveness of CAMU operation by eliminating the problems resulting from standing water within the existing bermed CAMU area, construction of the retention pond may be pursued.

2) <u>Deep Soil Sites (D and G)</u>

Site D was visited by the group and Site G was observed from the road. Existing shallow soil SVE systems at both sites were off at the time of the inspection (see Section 3.4 for additional discussion regarding the shutdown). The blowers inside the treatment building were observed as was a portion of the aboveground piping. Pilot study vents for the deep soil SVE pilot study were observed. A photograph of the Site D SVE system is included in Appendix B.

3) <u>Site A Shallow Groundwater</u>

The Site A control building and the eight extraction well locations were observed during the site visit. The approximate location of VOC-contaminated soils (the 1945 trench) was also observed.

4) <u>Site I Shallow Groundwater</u>

Since no remediation system has been constructed, this site was not visited.

5) <u>Site K Shallow Groundwater</u>

The existing treatment building at Site K and the approximate location of the groundwater extraction trench were observed. Construction of a replacement treatment system was in progress at the time of the site visit (see Section 3.4 for discussion of the replacement system). The potential location of an additional monitoring well was also briefly discussed. A photograph of the existing treatment system is included in Appendix B.

6) <u>Deep Groundwater</u>

The treatment plant was inspected and some of the extraction well locations were observed (SC-2 through 5). The control panel, transfer pumps, piping, air stripping towers and associated blowers were also observed. Photographs of the treatment system are included in Appendix B.

3.4 REMEDIAL ACTION RESULTS

A summary of remedy component status for OU2 sites is presented in Table 1-1.

1) <u>Shallow Soil Sites</u>

a) *Sites A, C, E, H, 129-3, and 129-5:* A work plan for remedial actions at these sites was approved in FY 1998. In <u>calendar</u> year 1998, remedial action was initiated at

the first of these sites, as 10,761 tons of soil was excavated from Site A, transported to the TCAAP CAMU, treated (stabilized), and transported off-site as non-hazardous waste for disposal at a permitted facility (Laidlaw Environmental Services, Inc., Rosemount, Minnesota). Work was suspended for the winter and will resume in spring 1999. There have been no significant problems in conducting this remedial action thus far. No changes to the remedial design are needed, though a stormwater retention pond is anticipated to be added to the CAMU in 1999, as discussed at the site visit (see Section 3.3). An Engineering Evaluation/Cost Analysis (EE/CA) for an SVE system to remediate VOC-contaminated soils at Site A was approved in FY 1998. Construction is scheduled for the latter part of FY 1999. A phytoremediation demonstration project was initiated at Sites C and 129-3 in FY 1998 and is scheduled to continue through FY 1999. The primary objective of the project is to determine the effectiveness of lead removed using one corn crop and one mustard crop that is grown and harvested each year. Note that remedy components 1 through 7 collectively address characterization, excavation, sorting, treatment, disposal, site restoration, and site access restrictions for these six sites. Removal actions initiated at Site A comply with these remedy components. Completion of removal actions at Site A and the other 5 sites are expected to continue to satisfy these remedy components.

Following all soil removal actions, a five-year period of groundwater monitoring is required to be conducted at these six sites (remedy component #8) to verify that soil characterization and/or remediation activities did not cause impacts to groundwater. Since removal actions are just getting started, this five-year period has not yet started.

b) Sites B and 129-15: Remedy component #9 specifies characterization of these two dumps. A work plan for characterization of these two sites was approved in FY 1998.
 Field work was conducted in early FY 1999 and a documentation report is currently being prepared.

2) <u>Deep Soil Sites (D and G)</u>

Remedy component #1 for deep soil sites requires groundwater monitoring in the vicinity of the sites. Groundwater quality trend graphs show that the most dramatic decreases in concentrations occurred between 1987 and 1991-1993. Since then, the concentrations generally appear to be decreasing, but at a much slower rate (asymptotic behavior). The declining concentrations (asymptotic behavior) could also be described in terms of a first order decay process. A semilog regression of concentration versus time for wells 03U094 and 03U096 reveals a steady rate constant since 1987. Four of the five groundwater monitoring wells still exceed the cleanup level for trichloroethene and one well exceeds the cleanup levels for 1,1-dichloroethene and 1,1,1-trichloroethane (Table 3-1). Trichloroethene is the furthest from reaching cleanup levels (three wells with concentrations between 202 and 500 μ g/l versus the 5 μ g/l cleanup level). Groundwater monitoring will continue to be conducted to monitor cleanup progress.

Control of site access (remedy component #2) is accomplished through maintenance of the existing TCAAP facility fence and locking gates.

The third remedy component is to install and operate deep SVE systems with modified shallow SVE. The existing shallow SVE systems (Figures 3-1 and 3-2) began operation in 1986 as Interim Remedial Actions to address VOC contamination in the soils. The existing system at Site D consists of 39 shallow vents (depths of 33 to 54 feet) and one deep vent (depth of 150 feet). At Site G there are 89 shallow vents (depths of 23 to 55 feet).

The existing shallow soil SVE systems have been very effective in removing VOCs from soils. The systems have removed a combined total of over 220,000 pounds of VOCs from startup in 1986 through FY 1998. However, mass removal rates have declined to lower rates, as evidenced by the FY 1998 mass removal data in Table 3-2. The Site D and G SVE systems were shutdown on July 24 and August 6, 1998, respectively, to allow

for additional system investigation. A report recommending that the systems remain off is currently under review.

To address the deeper soils (below the lower reach of the existing SVE systems and above the water table), a pilot study was conducted in FY 1998 with new deep vents constructed at Site D (this pilot study was to be completed prior to deciding whether to conduct a pilot study at Site G). A pilot study report is currently being prepared.

Remedy component #4 is to evaluate enhancements to the SVE systems, which is being accomplished with preparation of the above-mentioned reports.

Remedy components #5 and #6 are to maintain existing clay caps and existing surface drainage controls. These items are routinely inspected by Alliant Techsystems to ensure their integrity is maintained. No significant problems have been observed in these inspections nor were any problems evident at the site visit.

Characterization of Site D shallow soils and the Site G dump (remedy component #7) has not yet been completed. Some characterization work has been completed, but more investigation will be required to satisfy this component.

3) <u>Site A Shallow Groundwater</u>

Groundwater monitoring (remedy component #1) continues to be conducted to evaluate plume migration and remedy performance.

Groundwater containment and mass removal (remedy component #2) is being accomplished through operation of eight extraction wells. The extraction well capture boundary is shown on Figure 3-3 (groundwater contour map). The plume extent is shown on Figure 3-4. Comparison of these two figures shows that the capture boundary encompasses the portion of the plume that is above cleanup levels. Pumping rates for the eight extraction wells during FY 1998 are shown in Table 3-3. The FY 1998 average

flow rate was 29.5 gpm which exceeds the target rate of 25 gpm. The Site A groundwater extraction system removed 5.7 pounds of VOCs in FY 1998 and has reached 26.3 pounds as a cumulative total (Table 3-4).

Groundwater quality data from monitoring wells and extraction wells shows that tetrachloroethene and trichloroethene are above cleanup goals in and near the source area, but are below cleanup levels at the first line of extraction wells and are non-detectable in the second line of extraction wells. 1,2-Dichloroethene is below cleanup levels in the source area, but is above cleanup levels in two of the first-line extraction wells, suggesting that biodegradation of tetrachloroethene and trichloroethene is occurring. The second line of extraction wells only show detection of 1,2-dichloroethene and all detections are about an order of magnitude below cleanup levels, suggesting that they could potentially be shut off. The two outermost extraction wells in the first line are also below cleanup goals.

With regard to system performance, iron fouling has been a significant problem for this recovery system. Extraction well pumps and other components require frequent cleaning and/or replacement.

The SWCA includes the off-site portion of the site A groundwater plume. Also, the OU1 Alternate Water Supply and Well Abandonment Program is underway and was expanded to cover the area affected by the OU2 Site A shallow groundwater plume (both on-site and off-site). Remedy component #3 is therefore in place. Currently, there are no well owners that need to be contacted and there are no pending water supply hookups or well abandonments. The established program continues to meet the intent of this remedy component.

Extracted groundwater is discharged to the city of Shoreview's sanitary sewer in accordance with remedy component #4. Effluent water quality results for FY 1998 are shown in Table 3-5 and have consistently met the discharge limits, as specified in

Industrial Discharge Permit Number 2194 from the Metropolitan Council Environmental Services (MCES).

The fifth remedy component, source characterization and remediation, is currently in progress. Site A was characterized in 1997. Removal of metals-contaminated soils was initiated in 1998 (as previously discussed) and should be completed in 1999. The source of chlorinated VOCs (the 1945 trench) was identified and will be remediated in-situ through installation of an SVE system in the latter part of 1999.

4) <u>Site I Shallow Groundwater</u>

Groundwater monitoring continues to be conducted as required by remedy component #1. Monitoring results continue to show chlorinated VOCs above cleanup levels in Site I shallow groundwater. The Site I trichloroethene plume is depicted in Figure 3-5.

Remedy components #2 and #3 (groundwater extraction and discharge to sanitary sewer), have not been completed. A pump and treat system to address site contamination has not yet been designed.

Remedy component #4, additional characterization of soil and groundwater, has been completed. This work led to proposed construction of a dual-phase extraction remedy (combining groundwater extraction and soil vapor extraction). The proposed remedy has been approved and a pilot test is scheduled to be conducted in FY 1999. Pilot study results will be evaluated prior to construction of any full-scale system(s).

5) <u>Site K Shallow Groundwater</u>

Groundwater monitoring continues to be conducted at Site K (remedy component #1). Results continue to show that chlorinated VOCs are present above cleanup levels (specifically, trichloroethene and cis-1,2-dichloroethene range up to 44,000 μ g/l and 15,000 μ g/l, respectively, versus cleanup levels of 30 and 70 μ g/l).

Remedy component #2 requires installation of sentinel wells at the bottom of Unit 1 and the top of Unit 3 (to determine if any vertical migration is occurring). Potential well locations were briefly discussed at the site visit. The Predesign Investigation Work Plan for Site K is under review and these wells have not yet been installed.

Hydraulic containment (remedy component #3) is being achieved as shown by comparison of Figure 3-6 (groundwater contour map) and Figure 3-7 (plume map). The trench extracts groundwater at an approximate rate of 8 gpm (quarterly volumes of groundwater extracted during FY 1998 are shown in Table 3-6).

Groundwater treatment is accomplished via an air stripping treatment system. The existing air stripper has been providing adequate treatment; however, it is extremely maintenance-intensive due to iron-fouling problems (packing must be replaced every 4 to 6 weeks). As a cost saving measure, a new air stripping treatment system is currently being constructed and will utilize a fluidized-bed that should be much more resistant to fouling problems.

Discharge of treated water to Rice Creek and the associated discharge monitoring are required by remedy components #5 and #6. The treated water consistently meets the substantive requirements of Document No. MNU000579 (MPCA). Ineffluent and effluent analytical data for FY 1998 is shown in Table 3-7. The Site K system removed 10.2 pounds of VOCs from the aquifer in FY 1998.

Additional investigation (remedy component #7) is underway. The Predesign Investigation Work Plan is currently being reviewed.

6) <u>Deep Groundwater</u>

Hydraulic containment and source area contaminant removal (remedy component #1) is being accomplished through operation of the TGRS. The TGRS system layout is shown on Figure 3-8. Groundwater contour maps showing the capture boundary in the three

impacted hydrogeologic units are shown on Figures 3-9, 3-10, and 3-11. A plume map for Upper Unit 3 is shown on Figure 3-12, which depicts the greatest overall extent of contamination for on-TCAAP areas (OU2). Comparison of capture boundaries with Figure 3-12 clearly shows that the TGRS achieves containment at the TCAAP boundary. The system pumped at an average rate of 2,322 gpm in FY 1998 (2,054 gpm from boundary wells and 268 gpm from source area wells). Table 3-8 shows monthly volumes pumped for FY 1998 and also shows annual volumes since FY 1989. The TGRS removed 6,132 pounds of VOCs in FY 1998, reaching a cumulative total of 167,289 pounds. Annual mass removal totals are shown in Table 3-9, with a well by well breakdown for FY 1998. It is evident that the source area wells (SC-1, SC-3, SC-4, and SC-5) are very effective at mass removal: they are removing 45% of the VOC mass while accounting for only 12% of the water volume pumped (SC-5 removed 42% of the mass at less than 5% of the volume). Optimization of mass removal (while maintaining capture) is currently being studied with a report expected in FY 1999. Annual mass removal has been on a declining trend since the maximum of 26,760 pounds in 1991 (Table 3-9).

Groundwater treatment is accomplished through treatment in four air strippers, followed by discharge to the Arsenal Sand & Gravel Pit (remedy components #2 and #3). Treatment has been very effective as shown on the influent/effluent trichloroethene trend graphs (Figure 3-13). This figure also shows that trichloroethene in the influent is slowly declining (1,500 to 2,000 μ g/l during the early operational period (late 1980's) to about 500 μ g/l now). The gravel pit continues to be an effective means of treated water disposal.

Although the SWCA does not cover the TCAAP facility, the OU1 Alternate Water Supply and Well Abandonment Program is underway, which also covers the TCAAP facility itself. This program continues to meet the intent of remedy component #4.

Reviews of new technologies (remedy component #5) are presented in the Annual Performance Report, as applicable. A study is currently being conducted to evaluate the effects of natural attenuation on deep groundwater contaminants.

Groundwater monitoring (remedy component #6) continues to be conducted to track remedy performance. Monitoring has shown that along the TCAAP boundary, the plume width (as defined by exceedance of the trichloroethene cleanup level of 5 μ g/l) has been shrinking since 1993. Extraction well B-12 was shutdown (with MPCA approval) in November 1996, in response to this shrinking plume width. Based on FY 1998 data, the shrinking plume width now suggests that shutting off extraction well B-7 could also be considered.

3.5 ARARS REVIEW

The ARARs identified in the OU2 ROD (pages 53 to 59) are still applicable. ARARs are being met with the exception of groundwater cleanup standards. Groundwater recovery systems for Site A, Site K, and OU2 Deep Groundwater provide containment of contaminant plumes until the cleanup standards are met (the Site I system, when completed, will perform this same function).

No new ARARs have been identified that are believed to be applicable to the OU2 remedies.

3.6 RECOMMENDED CHANGES TO REMEDIAL ACTIONS

The following recommendations are made:

- 1) <u>Shallow Soils</u>: None
- Deep Soil Sites (D and G): Consider terminating operation of the shallow SVE systems.
- 3) <u>Site A Shallow Groundwater</u>: Consider shutting off some of the clean extraction wells. If their operation is no longer required, significant O&M cost savings could be realized from reductions in well and component cleaning/replacement, electricity usage, sampling requirements, and sewer use fees.
- 4) <u>Site I Shallow Groundwater</u>: None
- 5) <u>Site K Shallow Groundwater</u>: None
- 6) <u>Deep Groundwater</u>: Consider shutting off additional recovery well(s) and implement the recommendations of the mass removal optimization study, when finalized.

3.7 STATEMENT OF PROTECTIVENESS

The components of the OU2 remedy remain protective of human health and the environment.

4.0 Operable Unit 3 (OU3)

4.1 **REMEDIAL ACTION OBJECTIVES**

The objective of the OU3 remedial action is to protect human health and the environment through containment of the south plume until restoration of the aquifer is completed. Containment is provided at the southern edge of the plume through pumping of City of New Brighton well NBM #13. In addition to the containment component, protection of human health is also facilitated through the remedy components of GAC treatment of extracted groundwater, offering of alternate water supply to any impacted private well owners, and designation of the SWCA.

A human health risk assessment for TCAAP was performed by the USEPA in 1991 evaluating carcinogenic and non-carcinogenic risks associated with OU3 contaminated groundwater. Exposure pathways that were evaluated included ingestion, inhalation during showering, and absorption through the skin during showering or bathing. Carcinogenic risk was found to exceed acceptable levels, as defined by the USEPA and MPCA. Non-carcinogenic risk was found to have very slight exceedances of acceptable levels. The remedial action achieves substantial risk reduction by eliminating private well users, containing the plume, and providing effective treatment of extracted groundwater prior to its beneficial use for municipal water supply.

4.2 SUMMARY OF THE SELECTED REMEDY

The components of the selected remedy for OU3 are as follows:

- Extraction of groundwater at the leading edge of the south plume.
- Treatment of extracted groundwater for the removal of VOCs by a pressurized GAC system.
- Discharge of treated groundwater to the potable water supply of the City of New Brighton.
- Monitoring of the groundwater to verify the effectiveness of the remedy.

4.3 SITE VISIT

On March 16, 1999, a site visit was conducted by the USEPA, MPCA, U.S. Army, Alliant Techsystems, and other parties as shown on the list of Attendees presented as Appendix A.1. The site inspection checklist that was completed for OU3 is included as Appendix A.9. The inspection included the PGRS treatment plant and NBM #13, which is located inside the PGRS treatment building. Two of the City's engineering consultants (Teri Perry and Greg Keil, Barr Engineering), were present to answer questions and to guide the inspection. The plant was observed to be well maintained (see Appendix B for photographs).

4.4 **REMEDIAL ACTION RESULTS**

Status of the OU3 remedial action components is summarized in Table 1-1.

Groundwater extraction (remedy component #1) is being accomplished through continual pumping of well NBM #13. Pumping volumes are shown in Table 4-1. Figure 2-1 shows groundwater contours and the approximate capture limit based on data from summer 1998. The

contours clearly show the influence of pumping. The trichloroethene plume for OU3 (and OU1) is shown on Figure 2-2, including the capture boundary from Figure 2-1. The capture zone clearly encompasses the southern edge of the plume. Trichloroethene concentrations in well NBM #13 have been gradually declining. Initial concentrations in 1994 were about 10 to 15 μ g/l and have declined to less than 2 μ g/l in 1998 (Figure 4-1). Mass removal was only 5.1 pounds in FY 1998 (Table 4-1).

Treatment of extracted groundwater in the PGRS treatment plant prior to discharge into the City of New Brighton municipal water distribution system (remedy component #2) continues to be very effective, as evidenced on Figure 4-1 and Table 4-2. The treatment system consists of three GAC vessels plumbed in parallel. Another three GAC vessels are plumbed in series with the first three to provide backup treatment. Sampling between carbon vessels is routinely conducted (in a similar manner to that described for the OU1 PGAC system) to determine when a carbon change-out is needed.

In accordance with remedy component #3, treated water is used by the City of New Brighton (and also the City of Fridley through the interconnection) for municipal water supply.

Groundwater monitoring, as required by remedy component #4, continues to be conducted to verify performance of the remedy. The U.S. Army prepares a monitoring plan each fiscal year for approval by the USEPA and MPCA. Based on groundwater monitoring data from the FY 1998 APR, trichloroethene concentrations are about 300 μ g/l just off the TCAAP boundary (in Unit 3). In the Prairie du Chien (Upper Unit 4), trichloroethene concentrations range up to about 80 μ g/l just off the TCAAP boundary. Concentrations near NBM #13 are near the cleanup level of 5 μ g/l.

4.5 ARARS REVIEW

The ARARs identified in the OU3 ROD (pages 25 to 28) are still applicable. No new ARARs have been identified that are believed to be applicable to the OU3 remedy. ARARs are being met with the exception of groundwater cleanup standards. The remedy provides containment of the VOC plume until aquifer restoration is complete (i.e., until cleanup standards are met).

4.6 **RECOMMENDED CHANGES TO REMEDIAL ACTIONS**

The VOC plume in OU3 appears to be stable or shrinking with time. Given that the concentrations in NBM #13 have declined to below the cleanup levels (and the degree of plume stability), the current level of hydraulic containment within OU3 should be re-evaluated. Plume stability may be the result of natural attenuation, which could also be further evaluated.

4.7 STATEMENT OF PROTECTIVENESS

The components of the OU3 remedy remain protective of human health and the environment.

5.0 Other Removal Actions

In addition to the <u>remedial</u> actions prescribed in the OU2 ROD, other areas of TCAAP will be addressed through <u>removal</u> actions. For the time period covered by this five-year review, there were no removal actions performed at other areas. Note: the Site A groundwater extraction system was installed as a removal action in 1994; however, it was incorporated into the final remedy in the OU2 ROD.

At present time, there is not a regulatory requirement to address removal actions in five-year reviews. New guidance is being developed by USEPA to expand five-year reviews to encompass removal actions where contaminants above unrestricted use levels will remain onsite. Therefore, it is anticipated that future five-year reviews for TCAAP will address removal actions.

Areas where removal actions are planned for TCAAP include the grenade range and outdoor firing range.

The next five-year review for the NB/AH Superfund Site must be completed within five years of this review and will be due approximately July 2003.

7.0 Approvals

The remedies reviewed in this report remain protective of human health and the environment, continue to comply with ARARs, and continue to be cost-effective.

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V

Signature:	W_E. Man
Printed Name:	William E. Munc
Title:	Director, Superfund Civision

Date: 1/3-/17

MINNESOTA POLLUTION CONTROL AGENCY

Signature:	Date:	
Printed Name:		
Title:		

U.S. ARMY

Signature:	 Date:	
Printed Name:		
Title:		

7.0 Approvals

The remedies reviewed in this report remain protective of human health and the environment, continue to comply with ARARs, and continue to be cost-effective.

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V

Signature:	 Date:	
Printed Name:		
Title:		

MINNESOTA POLLUTION CONTROL AGENCY

Signature:	Mulsel	tome	Date: 9/24/99
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Title:	Manacer	an MACA-Mation &	amediatio_

U.S. ARMY

Signature:	 Date:	
Printed Name:		
Title:		

7.0 Approvals

The remedies reviewed in this report remain protective of human health and the environment, continue to comply with ARARs, and continue to be cost-effective.

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION V

Signature:	Date:
Printed Name:	
Title:	
MINNESOTA POLLUTION CONTROL AGEN	ICV
MINNESOTATOLLUTION CONTROL AGEN	
Signature:	Date:
Printed Name:	

U.S. ARMY

Title:

Signature:	Michael PH
Printed Name:	MICHAEL P. FIX
Title:	Commander's Representative

Date: 3054199

Tables

Table 1-1

		Is the component being	Is the component doing what it is	
Remedy	Component	implemented?	suppose to?	Comments
Operabl	e Unit 1: Deep Groundwater			
#1:	Alternative Water Supply/Well Abandonment	Yes	Yes	
#2:	Drilling Advisories	Yes	Yes	Component completed
#3:	Groundwater Containment	Yes	Yes	
#4:	Removal of VOCs by GAC (Discharge Quality)	Yes	Yes	
#5:	Discharge of Treated Water	Yes	Yes	
#6:	Groundwater Monitoring	Yes	Yes	
Operabl	e Unit 2: Shallow Soil Sites			
#1-7:	Soil Remediation:			
	Site A	Yes	Partially	Sites partially excavated in 1998; to be completed in 1999. SVE system will be installed in the latter part of 1999.
	Site C	No	No	Excavation is scheduled of 2001. A phytoremediation proejct is currently underway.
	Site E	No	No	Excavation is scheduled for 2000.
	Site H	No	No	Excavation is scheduled for 2000.
	Site 129-3	No	No	Excavation is scheduled for 2001. A phytoremediation proejct is currently underway.
	Site 129-5	No	No	Excavation is scheduled of 2000.
#8	Groundwater Monitoring	No	No	Starts after #1-7 are completed
#9	Characterization of Dumps (Sites B and 129-15)	Yes	Yes	Investigation was conducted in early FY 1999. Reports currently under regulatory review.

Remedy	7 Component	Is the component being implemented?	Is the component doing what it is suppose to?	Comments
Operab	le Unit 2: Deep Soil Sites			
#1:	Groundwater Monitoring	Yes	Yes	
#2:	Restrict Site Access	Yes	Yes	
#3:	SVE Systems	Yes	Partially	Deep SVE pilot study completed
#4:	Enhancements to SVE Systems	Yes	No	Optimization testing completed. A report is currently under review.
#5:	Maintain Existing Site Caps	Yes	Yes	
#6:	Maintain Surface Drainage Controls	Yes	Yes	
#7:	Characterize Shallow Soils and Dump	Yes	Partially	Some characterization work has been completed. Additional characterization for non-VOC contaminants is still needed.

		Is the component being	Is the component doing what it is	
Remedy	y Component	implemented?	suppose to?	Comments
Operab	le Unit 2: Site A Shallow Groundwater			
#1:	Groundwater Monitoring	Yes	Yes	
#2 :	Groundwater Containment/Mass Removal	Yes	Yes	
#3:	Drilling Advisory/Alternative Water Supply/Well Abandonment	Yes	Yes	
#4:	Discharge of Extracted Water	Yes	Yes	
#5:	Source Characterization/Remediation	Yes	Yes	
Operab	le Unit 2: Site I Shallow Groundwater			
#1:	Groundwater Monitoring	Partially	Partially	OU2 ROD predesign work is in progress
#2:	Groundwater Extraction	No	No	See above
#3:	POTW Discharge	No	No	See above
#4:	Additional Investigation	No	No	See above

Remedy	v Component	Is the component being implemented?	Is the component doing what it is suppose to?	Comments
Operabl	e Unit 2: Site K Shallow Groundwater			
#1:	Groundwater Monitoring	Yes	Yes	
#2 :	Sentinel Wells	No	No	OU2 ROD predesign work plan in progress
#3:	Hydraulic Containment	Yes	Yes	
#4:	Groundwater Treatment	Yes	Yes	
#5:	Treated Water Discharged	Yes	Yes	
#6:	Discharge Monitoring	Yes	Yes	
#7:	Additional Investigation	No	No	OU2 ROD predesign work plan in progress for VOC problem. Investigation for non-VOC contaminants will occur after the building is removed.

Remedy	7 Component	Is the component being implemented?	Is the component doing what it is suppose to?	Comments
	le Unit 2: Deep Groundwater	implemented :	suppose to:	Comments
#1:	Hydraulic Containment and Contaminant Mass Removal	Yes	Yes	The work plan for optimizing the TGRS was approved in FY 1998
#2 :	Groundwater Treatment	Yes	Yes	
#3:	Treated Water Discharge	Yes	Yes	
#4:	Institutional Controls	Yes	Yes	
#5:	Review of New Technologies	Yes	Yes	MPCA Natural Attenuation Study
#6:	Groundwater Monitoring	Yes	Yes	
Operab	le Unit 3: Deep Groundwater			
#1:	Groundwater Extraction	Yes	Yes	
#2:	Groundwater Treatment	Yes	Yes	
#3:	Use of Water for Municipal Supply	Yes	Yes	
#4:	Groundwater Monitoring	Yes	Yes	

Table 2-1

OU1 PUMPING/VOC MASS REMOVAL DATA

				PGAC WELLS				T ()	PGRS Well	TOTAL
MTH/YR	ITEMS							Total PGAC Wells	Well # 13	TOTAL ALL GAC WELLS
Oct-97	Pumpage (Thousands of gals.)	20,859 75	28,986 82	893 262	316 171	51,216 298		102,270	44,166 3	146,436
	VOC Level (ppb) Total VOCs (lbs)	13	20	202	0	298 127		163	3 1	164
Nov-97	Pumpage (Thousands of gals.)	20,012	6,857	2,906 197	8 102	44,709		74,492	47,718	122,210
	VOC Level (ppb) Total VOCs (lbs)	34 6	101 6	5	0	216 81		97	2 1	98
Dec-97	Pumpage (Thousands of gals.)	2,205	2,692	27,675	2,631	50,886		88,179	44,011	130,190
	VOC Level (ppb) Total VOCs (lbs)	55 * 1	92 * 2	136 31	100 2	193 82		119	2 1	119
Jan-98	Pumpage (Thousands of gals.)	243	21,708	9,651	1,749	50,727		84,078	44,277	128,355
	VOC Level (ppb) Total VOCs (lbs)	45 ** 0	97 18	220 18	137 2	245 104		141	2 1	142
Feb-98	Pumpage (Thousands of gals.)	0	29,264	1,885	71	46,503		77,723	39,894	117,617
	VOC Level (ppb) Total VOCs (lbs)	45 ** 0	90 22	200 3	125 0	252 98		123	2 0	123
Mar-98	Pumpage (Thousands of gals.)	3,831	22,206	4,467	942	41,695	10,802	83,943	42,889	126,832
	VOC Level (ppb) Total VOCs (lbs)	45 ** 1	77 14	160 6	131 *** 1	210 73	110 10	106	1 0	106
Apr-98	Pumpage (Thousands of gals.)	19,940	1,541	5,645	0	33,469	34,491	95,086	37,172	132,258
	VOC Level (ppb) Total VOCs (lbs)	56 9	78 1	180 8	131 *** 0	310 87	140 40	146	2 1	146
May-98	Pumpage (Thousands of gals.)	8,036	20,913	2,275	0	34,124	39,116	104,464	18,045	122,509
	VOC Level (ppb) Total VOCs (lbs)	38 3	87 15	144 3	131 *** 0	173 49	146 48	117	0 0	117
Jun-98	Pumpage (Thousands of gals.)	992	10,378	155	97	30,296	27,520	69,438	41,482	110,920
	VOC Level (ppb) Total VOCs (lbs)	23 0	30 3	150 0	95 0	230 58	110 25	86	2 1	87
Jul-98	Pumpage (Thousands of gals.)	5,963	22,507	18,872	12,299	24,307	19,240	103,188	28,861	132,049
	VOC Level (ppb) Total VOCs (lbs)	27 1	67 13	135 21	104 11	252 51	153 25	122	1 0	122
Aug-98	Pumpage (Thousands of gals.)	2,054	33,340	1,407	113	23,390	9,892	70,196	42,302	112,498
	VOC Level (ppb) Total VOCs (lbs)	41 1	48 13	172 2	108 0	257 50	166 14	80	2 1	81
Sep-98	Pumpage (Thousands of gals.)	16,282	12,222	1,185	156	18,520	19,308	67,673	46,951	114,624
	VOC Level (ppb) Total VOCs (lbs)	43 6	63 6	220 2	130 0	370 57	220 35	107	2 1	108

VOC Levels were not sampled due to servicing of Well #3 during December. The levels for December are an average of the October-November levels.
 VOC Levels were not sampled due to maintenance of Well # 3 for months of January through March. These levels are an average of the Dec-97 and Apr-98 levels.
 VOC Levels were not sampled due to servicing of Well #6 for months of March through May. These levels are an average of January and February levels.

Table 2 - 2

PGAC Effluent Water Quality

Note:

These results are from sampling ports after the lead GAC vessel and before the lag vessel. Notes below indicated GAC replacement.

			QUA	CTERLY INFI-	UENT WELLD	IONITORING								MONTHLY O	NT:RATIO	NAL PERFORM	JANCE MOR	NTORING					
SAMPLE . DATE	COMPOUND (PPB)	Well #3	Weli #4	Well #5	Well #6	Well #14	Well#15	Contac A	tor#I B	Contac A	B	Contacte A	в	Contactor A	в }	Contactor A	в	Cuntuc A	lor#6 B	Contact A	B	Conta A	-tur #8 B
04/19/93 05/19/93 05/08/93 07/28/93 08/26/93 09/23/93 10/12/93 11/22/93	Total VOCs Total VOCs Total VOCs Total VOCs Total VOCs Total VOCs Total VOCs Total VOCs Total VOCs	424 432 301 248 377 323 297 410	277 265 340 270 328 234 290 313	156 237 191 206 215 140 181 215	0 159 159 147 158 155 139 169		 GAC Replaced in e AC Replaced in contact 	NS NS NS NS NS 0 0	- 0 0 0 0 0 3	NS NS NS NS NS NS 0 0	A, SA between 0 0 0 0 0 0 0 3 0 5 5 5 5 5 5 5 5 5 5 5	en March 22 NS NS NS NS NS O O O	0 0 0 1 1	NS NS NS NS NS U 0	esse is here 0 0 0 0 0 1 1 4 Vesse is b	ene the Lead Ver NS NS NS NS NS O O O O O	Sects	NS NS NS NS NS 0 0	0 0 0 0 0 3 3 5 6	NS NS NS NS NS U 0	0 0 0 0 0 0 1 3	NS NS NS NS NS 0 0	0 0 0 0 0 1 3
12/28/93 01/13/94	Total V(X)s	414	293	389	0		AC Repliced in conve	0	NS NS	0	NS NS	0	NS NS	0	NS NS	0	NS NS	- 0 0	NS NS	0	NS NS	0	NS NS
01/24/44 03/23/94 03/23/94 05/31/94 05/31/94 05/31/94 07/28/94 08/29/94 08/29/94 08/30/94 10/331/94	Titul VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs Tutal VOCs	139 383 178 397 404 412 270 385 209 203	292 322 382 336 386 312 269 288 214 226	269 204 168 135 168 169 156 177 158 156	182 213 150 166 135 149 134 132 121 126	, ·	i .	0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS 0	U D O O O O O O	NS NS NS NS NS NS NS NS NS NS NS NS NS N	0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS 0 26 - De		NS NS NS NS NS NS NS NS O TB		NS NS NS NS NS NS NS NS NS NS NS NS NS N	0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS O	0 0 0 0 0 0 0 0 0 0 0	N5 N5 N5 N5 N5 N5 N5 N5 N5 0	U 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS O
1 1/29/94 12/07/94	Total VOCs Total VOCs	203 197	226 239	156 151	. 126 132		GAC Replaced	NS NS	1 IA, 2A, 37 0 0	NS NS	0 0	NS	0	NS NS	0	NS NS	0 0	NS NS	0 0	NS NS	0 0	NS NS	0
01/31/95 02/24/95 03/31/95 04/30/95 05/30/95 05/30/95 07/31/95 08/31/95 08/31/95 10/31/95 11/20/95	Total VCCs Total VCCs	212 214 241 258 230 216 225 215 215 215 174 174	240 240 280 280 232 237 382 159 388 884 184	135 132 170 145 133 136 135 148 135 148 135 162 176	113 109 123 108 107 127 105 110 105 181		- GAC Replaced in a	NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 2.5 78 30 418	NS NS NS NS NS NS NS NS NS SA 5H 6H	0 0 0 0 0 0 0 0 0 0 3.7 , 78, 88 bet	NS NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS		NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS	
12/31/95	Total V()Ca	206	212	158	126		- UNC Replication	0	NS	0	NS	0	NS	0	NS	D	NS	0	NS	C	NS	0	NS
01/31/96 (12/24/96 03/31/96 05/31/96 05/31/96 05/31/96 07/31/96 09/30/96 10/31/96 11/30/96 12/31/96	Total VOCs Total VOCs	201 189 177 174 162 135 125 125 125 125 125 125 125 125 125 12		147 143 181 173 153	135 177 123 134 133 121 125 125 123 108 109	279		0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0 0 1.4 3	NS NS NS NS NS NS NS NS 0 0	0 0 0 0 0 0 0 0 1.1 1.8	NS NS NS NS NS NS NS U 7, 1997	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS NS NS N	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS 0 0	0 0 0 0 0 0 0 0 1.1 1.9	NS NS NS NS NS NS NS NS NS NS NS NS NS	0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS NS NS NS NS NS NS N
01/31/97 03/31/97 03/31/97 04/30/97 05/31/97 06/30/97 07/31/97 (18/31/97 18/31/97	Total VCCs Total VCCs	105 112 97 51 52 98 62 44 47 75	92 151 150 120 95 122 146	192 182 197 197 250 222 247 202	132 107 104 110 . 115 150 132 197 137 171	306 279 252 284 285 300 268 240 214 298	GAC Replaced in	N5 N5 N5 N5 N5 N5 N5 0 0	0 0 0 0 0 0 1.8 4.9	NS NS NS NS NS NS 0 0	0 0 0 0 0 1,9 6	NS NS NS NS NS NS NS NS NS NS CO O	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS NS 0 0	0 0 0 0 0 3.1 6.2 9.8 1997. ~A~	NS NS NS NS NS NS NS NS U Versets become	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS NS U U U	0 0 0 0 0 1.1 3 7.2	NS NS NS NS NS NS U 0	0 0 0 0 0 2.9 4.9 1	NS NS NS NS NS NS 0	0 0 0 0 0 0 0 0 1.7 5.1
11/30/97 [2/31/97	Total VOCa Tutal VOCa	بدر 54.5				216 193		0	NS NS	0	NS NS	0	NS NS	0	NS NS	0	NS NS	0	NS NS	0	NS NS	0	NS NS
01/31/98 02/28/98 03/31/98 04/30/98 05/31/98 05/31/98 07/31/98	Total V(X)s Total VOGs Total V(X)s Total V(X)s Total V(X)s Total V(X)s Total V(X)s	45 45 56 38 23 27 41	90 71 71 81 81 80 80	160 110 114 1150 1150 1135	125 131 131 131 131 95 104	252	- 110 140 146 110 153 166	0 0 0 0 3.5 6.8	2M 2M 2M 2M 2 N5 0 0	0 0 0 0 3.5 6	NS NS NS NS NS 0 0	0 0 0 0 2.3 3.7 6	NS NS NS NS NS 0 0	0 0 0 0 2 5.5 9.7	NS NS NS NS NS 0 0	0 0 0 0 2.5 4.6	NS NS NS NS NS 0 0	0 0 0 0 0 2.7 5.2	NS NS NS NS NS 0 0	0 0 0 0 1 0 7,3	NS NS NS NS O O	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	NS NS NS NS NS O O
09730798 10731798 11730798 12731798	Total YOCs Total YOCs Total YOCs Total YOCs Total YOCs	43	i . 6	3 220	130	370	GAC Replaced 220	ia contactor NS	t IA, 2A, 34 0	N. 4A. 5A. 6 NS	А. 7А. ВА Б 0	elween Sepie NS	ender 8, 19 0	198 - September NS	21, 1998. 0	*B* Versetz bes NS	Come the Less O	NS	0	NS	0	N5	0

Tabl	e	3-	1

Deep Groundwater Data Near Sites D and G: FY 1998

					1,1-	Cis-1,2-	1,1-	1,1,1-	1,2-
			Tetrachloroethene	Trichloroethene	Dichloroethene	Dichloroethene	Dichloroethane	Trichloroethane	Dichloroethane
			(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)	(ug/l)
OU2 Cl	eanup Level	(1)	5	5	7	70	70	200	5
Site D	03U096	17-Jun-98	<0.75	49.10	2.12	<0.76*	3.11	14.50	<1.10
	03U093	16-Jun-98	<0.75	202.00	6.76	1.03*	4.76	39.20	<1.10
	03U018	12-Jun-98	<0.75	230.00	3.76	2.97*	2.93	25.40	<1.10
Site G	03U094	15-Jun-98	<0.75	500.00	30.10	2.20*	4.20	320.00	<1.10
	03U014	08-Jun-98	<0.75	< 0.56	<1.70	<0.76*	< 0.73	<0.76	<1.10

Notes:

(1) Cleanup levels for Deep Groundwater from Table 1 of the OU2 ROD. Shading indicates exceedance of the cleanup level.

* Data is total 1,2-Dichloroethene, not the cis- isomer.

Table 3 - 2

Sites D and G SVE System Flow Rates and Mass Removal FY 1998

				1,1,1-Tr/	chloroethaue	1,1,2-Tric	hloroethlyene	Total VOCs	
Date	Days of Operation in Monitoring Period	Flow Rate ((1^.Ymin)	Liters of Air Sampled(L)	Mass in Sample (pg)	Weight Removed During Monitoring Period (lbs)	Mass in Sample (pg)	Weight Removed During Monitoring Period (lbs)	Weight Removed During Monitoring Period (Ibs)	Cumulative VOCs Removed (Ibs)
10/07/97	24	6570	10.04	7.4	6.75	48.0	43.78	50.53	115,679
11/01/97	20	6160	4.18	<4.4	0.00	22.0	39.49	39.49	115,719
12/05/97	23	6670	10.20	12.0	10.48	67.0	58.52	69.00	115,788
01/06/98	22	6610	11.52	14.0	10.26	78.0	57,18	67.44	115,855
02/01/98	21	6550	10.32	11.0	8.51	63.0	48.76	57.28	115,913
03/03/98	19	6130	11.52	12.0	7.05	61.0	35.42	12.86	115,955
01/07/98	25	6200	10.60	8.1	6.75	47.0	39.17	45.92	116,001
05/06/98	21	6440	11.52	11.0	7.50	61.0	41.59	49.09	116,050
06/02/98	19	6240	13.70	15.0	7.54	77.0	38.70	46.24	116,097
07/07/98	25	6230	10.86	12.0	9.99	64.0	53.30	63.30	116,160
08/01/98	20	6340	15.15	12.0	5.83	69.0	33.54	39.37	116,199
09/02/98	2	No Sample (i)	No Sample (2)	No Saniple (2)	No Sample (1)	No Sansple (2)	No Sample (i)	No Sample (2)	No Sample (

	· ·			1,1,1-Tri	hloroethane	1,1,2-Tric	hloroethlyene	cis-1,2-Dichl	oroethylene	Total VOCs	
Date	Days of Operation in Monitoring Period	Flow Rate (/1^Ymin)	l.llers of Air Sampled (L)	Mass in Sample (118)	Weight Removed During Monitoring Period (lbs)	Mass in Sample (11g)	Weight Removed During Monitoring Period (lbs)	Mass in Sample (µg)	Weight Removed During Monitoring Period (lbs)	Weight Removed During Monitoring Period (1bs)	Cumulative VOCs Removed (Ibs
10/07/97	24	7630	10.04	<4.4	0.00	7.7	8.16	<3.2	0.00	8.16	104,364
11/01/97	20	8360	4.18	<4.4	0.00	<4.2	0.00	<3.2	0.00	0.00	104,364
12/05/97	23	7530	10.20	<1.4	0.00	7.7	7.59	3.5	3.45	11.04	101,375
01/06/98	22	7340	11.52	<4.4	0.00	7,6	6.19	<3.2	0.00	6.19	101,382
02/01/98	21	7910	10.32	4.4	0.00	6.8	6.36	<3.2	0.00	6.36	101,388
03/03/98	19	7240	11.52	4.4	0.00	5.4	3.74	<3.2	0.00	3.74	101,392
01/07/98	25	5790	10.80	<1.4	0.00	5.6	4.36	<3.2	0.00	4.36	104,396
05/06/98	21	7240	11.52	4.4	0.00	6.5	4.98	<3.2	0.00	4.98	104,401
06/02/98	19	6720	17.40	<4.4	0.00	9.4	4.01	. 3.5	1.49	5.50	101,407
07/07/98	25	7240	10.86	<4.4	0.00	8.3	8.03	3.4	3.29	11.32	101,418
08/01/98	13	No Sample"	No Sample "	No Sample (1)	No Sample "	No Sample"	No Sample	No Sample ¹¹¹	No Semple "	No Sample "	No Sample

NOTES

1 Site D was shut down for evaluation on 07/21/98; therefore, no sample was taken in August. 2 Site D was shut down for evaluation on 08/06/98; therefore, no sample was taken in September

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Table 3-3

Site A Groundwater Pumping Data: FY 1998

Average Flow Rate (GPM)

Month	01U351	01U352	01U353	01U354	01U355	1-5 Subtotal	01U356	01U357	01U358	6-8 Subtotal	Total
Target GPM						15.0				10.0	25.0
Oct-97	4.7	4.0	4.3	4.1	4.6	21.7	4.8	1.6	4.6	11.0	32.7
Nov-97	4.4	3.7	4.1	3.4	4.2	19.8	3.4	1.5	4.5	9.4	29.2
Dec-97	3.3	2.8	4.1	3.5	4.1	17.8	4.2	1.3	4.2	9.7	27.5
Jan-98	1.4	3.6	4.5	4.2	4.6	18.3	3.8	1.5	4.5	9.8	28.1
Feb-98	3.1	3.7	4.3	3.8	4.3	19.2	4.5	1.6	4.3	10.4	29.6
Mar-98	4.4	3.0	4.0	3.6	4.4	19.4	4.3	1.8	5.2	11.3	30.7
Apr-98	4.1	3.4	3.6	4.2	4.3	19.6	4.0	1.2	4.2	9.4	29.0
May-98	5.0	3.7	3.9	4.8	3.6	21.0	4.5	1.5	5.1	11.1	32.1
Jun-98	4.4	3.6	3.2	4.2	3.4	18.8	4.2	1.3	4.6	10.1	28.9
Jul-98	2.7	3.7	3.6	4.5	3.4	17.9	4.3	1.5	4.5	10.3	28.2
Aug-98	3.5	3.3	3.6	3.8	3.6	17.8	4.8	1.6	5.5	11.9	29.7
Sep-98	2.8	3.7	4.3	3.9	3.2	17.9	4.2	1.6	4.1	9.9	27.8
FY98 Average	3.7	3.5	4.0	4.0	4.0	19.1	4.3	1.5	4.6	10.4	29.5

Table 3-4

Site A VOC Removal by Groundwater Pumping: FY 1998

Date	Water Pumped (gal)	Conversion Factor	1,2-DCE Effluent (µg/L)	1,2-DCE Removed (lbs)	TRCLE Effluent (µg/L)	TRCLE Removed (lbs)	Total VOCs Removed (lbs)
cumulative totals up to 09/02/97	58,513,015			19.93		0.64	20.57
10/07/97	1,345,740	8.35E-09	32.6	0.37	1.66	0.02	0.38
11/04/97	1,178,780	8.35E-09	47.2	0.46	1.40	0.01	0.48
12/02/97	1,355,040	8.35E-09	25.8	0.29	1.07	0.01	0.30
01/06/98	1,394,640	8.35E-09	43.8	0.51	2.48	0.03	0.54
02/03/98	993,110	8.35E-09	120.0	1.00	3.38	0.03	1.02
03/03/98	1,350,330	8.35E-09	27.0	0.30	1.04	0.01	0.32
04/07/98	1,572,520	8.35E-09	32.0	0.42	2.21	0.03	0.45
05/05/98	1,118,250	8.35E-09	32.4	0.30	1.72	0.02	0.32
06/02/98	1,295,250	8.35E-09	33.6	0.36	1.29	0.01	0.38
07/28/98	2,286,000	8.35E-09	31.7	0.61	1.08	0.02	0.63
08/04/98	315,900	8.35E-09	34.8	0.09	0.82	0.00	0.09
09/09/98	1,430,480	8.35E-09	38.8	0.46	1.67	0.02	0.48
09/30/98	917,830	8.35E-09	38.8	0.30	1.67	0.01	0.31
CUMULATIVE TOTALS:	75,066,885			25.41		0.87	26.28

TABLE 3-5

Site A Effluent Water Quality : FY 1998

Site ID	Sample Date	1,2- Dichloroethene (ug/l)	Tetrachloroethene (ug/l)	Trichloroethene (ug/l)	Mercury (ug/l)	Total Suspended Solids (ug/l)	Chemical Oxygen Demand (ug/l)
DISCHARGE CF	RITERIA	3,000	3,000	3,000	0.2	None	None
EFFLUENT-A	07-Oct-97	35.10	<0.75	1.82	<0.10		
EFFLUENT-A	04-Nov-97	50.80	<0.75	1.54	<0.10		
EFFLUENT-A	02-Dec-97	27.70	<0.75	1.18	<0.10		
EFFLUENT-A	06-Jan-98	47.10	<0.75	2.73	0.10		
EFFLUENT-A	03-Feb-98	129.00	<0.75	3.71	<0.10		
EFFLUENT-A	03-Mar-98	29.00	<0.75	1.14	<0.10		
EFFLUENT-A	07-Apr-98	34.40	<0.75	2.43	<0.10		
EFFLUENT-A	05-May-98	34.80	<0.75	1.89	<0.10		
EFFLUENT-A	02-Jun-98	36.10	<0.75	1.42	<0.10	<4000.00 JP	93100.00
EFFLUENT-A	07-Jul-98				<0.10		
EFFLUENT-A	28-Jul-98	34.10	<0.75	1.19	<0.10		
EFFLUENT-A	04-Aug-98	37.40	<0.75	0.91	<0.10		
EFFLUENT-A	08-Sep-98	41.70	<0.75	1.84	0.2		

Notes: JP = The value is below the method detection level, but above the instrument detection level.

Table 3-6

Summary of Monthly VOC Removal for Fiscal Year 1998: Site K Groundwater Pumping

Month	VOC Influent ^{1,2} (µg/L)	Water Treated ³ (million gallon)	Total VOCs Into Treatment Center (lbs/quarter)	VOC Effluent ¹ (µg/L)	Total VOCs Out Of Treatment Center ² (lbs/quarter)	Total VOCs Removed By Stripping Towers (lbs/quarter)
December	344.20	0.91662	2.63	0.0	0.000	2.63
March	257.40	1.17827	2.53	0.0	0.000	2.53
June	313.01	0.94963	2.48	0.0	0.000	2.48
September	346.50	0.89840	2.60	0.0	0.000	2.60

Notes:

¹ VOC concentrations do not include estimated concentrations for compounds detected below the reporting limit

² VOC influent and effluent data is collected in the third month of every quarter. Data is used to calculate VOC's removed for the quarter.

³ Number reflects quarterly volume.

Table 3-7

Fiscal Year 1998 Site K Groundwater Treatment System Concentrations (Organics), TCAAP

Sample Location	Date	CCL4	CHCL3	CH2CL2	C2H3CL	TCLEE	TRCLE	11DCE	11DCLE	111TCE	C12DCE	T12DCE	12DCLE	112TCE	12DCLP	TCLTFE
	10/2/02				0.22		0.22	0.06	0.20		0.00	0.24	0.22			
Effluent	10/7/97				< 0.33		< 0.32	< 0.36	< 0.30		<0.29	< 0.34	< 0.32			
Effluent	11/4/97				< 0.33		0.68 J	< 0.36	< 0.30		<0.29	< 0.34	< 0.32			
Effluent	11/4/97				<0.33 D		0.66 JD	<0.36 D	<0.30 D		<0.29 D	<0.34 D	<0.32 D			
Effluent	12/2/97				< 0.33		< 0.32	< 0.36	< 0.30		0.40 J	< 0.34	< 0.32			
Effluent	12/2/97				<0.33 D		0.32 JD	<0.36 D	<0.30 D		0.42 JD	<0.34 D	<0.32 D			
Effluent	1/6/98				< 0.15		< 0.14	< 0.16	< 0.08		<0.23	< 0.09	< 0.04			
Effluent	1/6/98				<0.15 D		<0. 14 D	<0.16 D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	2/3/98				< 0.15		< 0.14	< 0.16	< 0.08		< 0.23	< 0.09	< 0.04			
Effluent	2/3/98				<0.15 D		<0.14 D	<0.16 D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	3/3/98				< 0.15		0.64 J	< 0.16	< 0.08		< 0.23	< 0.09	< 0.04			
Effluent	3/3/98				<0.15 D		<0.14 D	<0.16 D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	4/7/98				< 0.15		< 0.14	< 0.16	$<\!0.08$		< 0.23	< 0.09	< 0.04			
Effluent	4/7/98				<0.15 D		<0.14 D	<0.16 D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	5/5/98				< 0.15		< 0.14	< 0.16	$<\!0.08$		< 0.23	< 0.09	< 0.04			
Effluent	5/5/98				<0.15 D		<0.14D	<0.16D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	6/2/98				< 0.16		0.33 J	< 0.16	$<\!\!0.08$		< 0.23	< 0.09	< 0.04			
Effluent	6/2/98				<0.17 D		0.29 JD	<0.16D	<0.08 D		<0.23 D	<0.09 D	<0.04 D			
Effluent	7/9/98	< 0.1	$<\!0.07$	< 0.1	< 0.18	< 0.1	0.23 JP	< 0.16	< 0.08	< 0.14	< 0.23	< 0.09	< 0.04	< 0.09	< 0.04	< 0.1
Effluent	7/9/98	<0.1D	<0.07 D	<0.1D	0.19 D	<0.1D	0.24 JPD	<0.16D	<0.08 D	<0.14 D	<0.23 D	<0.09 D	<0.04 D	<0.09 D	<0.04 D	<0.1 D
Effluent	8/4/98				< 0.20		0.61 J	< 0.16	< 0.08		0.44 J	< 0.09	< 0.04			
Effluent	8/4/98				< 0.21		0.60 JD	< 0.16	< 0.08		0.45 JD	< 0.09	< 0.04			
Effluent	9/8/98				< 0.22		< 0.14	< 0.16	< 0.08		<0.23	< 0.09	< 0.04			
Effluent	9/8/98				<0.23 D		<0.14D	<0.16D	<0.08D		<0.23D	<0.09 D	<0.04 D			
	10/0/07				1.0		0.00	0 55 1	0.00			10	0.00			
Influent	12/2/97				1.2		260	0.77 J	< 0.30		71	12	< 0.32			
Influent	3/3/98				0.89 J		200	< 0.156	< 0.08		49	8.4	< 0.04			
Influent	6/2/98				0.41		260	0.36 J	0.25 J		47	5.6	< 0.04			
Influent	9/11/98				1.1		280	0.67 J	0.32 J		56	9.4	< 0.04			

<u>Notes:</u>Concentrations in μ g/L.

D - Duplicate analysis.

J - Value is estimated.

P- Result is less than reporting level, but greater than instrument detection limit.

TABLE 3-8

FISCAL YEAR 1998 EXTRACTION WELL WATER PUMPED TGRS, TCAAP NEW BRIGHTON, MINNESOTA

Volume of Water Pumped (gallous)																		
	· · · · · · · · · · · · · · · · · · ·	B2	B3	B4	B5	B6	B7	B8	B9	B10	B11	B12	SC1	SC2	SC3	SC4	SC5	TOTAL
October 1997	B1 9.642,100	5,600,600	10,753,100	8,651,900	8,896,300	11,546,000	12,002,600	5,067,100	6,888,600	10,983,800	3,784,500	2,800	1,449,100	2,159,400	3,531,100	. 0	4,495,900	105,454,900
November 1997	9,292,200	5,468,000	10,479,400	8,410,800	8,706,500	11,224,400	11,721,000	5,359,800	6,736,700	11,032,400	2,828,200	0	1,398,700	1,777,900	3,670,200	0	4,351,400	102,457,600
December 1997	8,534,200	5,583,000	9,868,600	7,986,400	8,445,200	10,867,300	11,338,400	5,536,200	5,318,000	10,584,600	4,978,300	0	1,346,800	1,586,300	4,620,400	0	4,295,400	100,889,100
January 1998	8,418,700	5,923,800	10,500,500	7,711,800	9,053,500	11,293,100	11,717,700	5,677,700	5,702,500	10,906,000	4,707,100	0	1,400,700	1,205,000	4780000	0	4,573,100	103,571,200
February 1998	9,490,100	4,657,800	8,745,900	7,320,100	8,025,100	10,176,500	9,767,800	4,979,100	5,665,400	8,873,600	4,009,700	0	1,162,700	1,274,900	4,194,700	100	4,434,100	92,777,600
March 1998	10,660,600	5,251,200	10,619,600	8,260,800	9,015,800	11,389,900	11,836,100	5,662,800	6,492,400	10,621,200	4,853,300	0'	1,370,600	2,132,000	4,692,100	0	5,003,800	107,862,200
April 1998	10,161,900	4,938,700	10,212,100	6,624,100	8,646,800	10,842,600	11,320,800	5,381,800	6,178,700	10,305,000	4,606,500	0	1,296,800	2,118,400	4,490,000	0	4,690,200	101,814,400
May 1998	9,420,200	4,549,700	9,377,600	6,262,600	4,927,500	9,934,100	12,070,700	4,877,000	5,575,100	9,447,400	4,160,400	٥	1,184,900	2,565,800	4,873,900	0	4,887,300	94,114,200
June 1998	10,620,600	4,906,000	10,291,400	4,632,200	8,781,600	10,925,500	11,367,600	5,351,800	6,087,300	9,744,500	4,633,200	9,300	1,253,900	2,024,200	4,047,300	0	3,769,800	98,446,200
July 1998	10,354,800	4,328,800	9,601,900	7,684,500	9,903,000	10,403,200	10,803,300	5,090,500	5,392,500	9,855,800	4,449,100	0	1,200,900	1,250,600	4,304,400	100	3,396,000	98,019,400
August 1998	10,316,700	2,886,900	9,793,800	8,265,700	9,964,500	10,562,500	11,710,000	5,123,700	2,842,700	9,449,000	4,372,500	0	1,190,800	1,023,800	4,354,600	0	3,382,800	95,240,000
September 1998	8,771,900	4,377,000	8,967,800	6,577,100	10,068,900	10,544,400	11,685,100	5,024,600	6,570,600	8,569,200	4,010,800	0	1,123,900	2,296,700	4,088,400	0	2,684,700	95,361,100
TOTAL FY98	115,684,000	58,471,500	119,211,700	88,388,000	104,434,700	129,709,500	137,341,100	63,132,100	69,450,500	120,372,500	51,393,600	12,100	15,379,800	21,415,000	51,647,100	200.	49,964,500	1,196,007,900
																		
11 189	67,563,900	69,361,850	72,257,490	75,237,700	76,328,500	100,611,510	138,278,100	42,329,200	60,613,300	54,516,600	93,534,437	60,210,340	13,867,660	20,078,880	36,660,309	12,593,300	39,307,600	1,033,353,676
FY90	70,722,300	69,450,060	73,633,450	80,511,000	71,897,000	105,220,300	117,609,400	40,747,900	59,883,400	95,227,900	40,939,800	63,867,460	11,281,750	19,278,830	35,609,300	15,260,500	37,275,400	1,008,415,750
FY91	99,482,900	102,399,960	98,521,050	104,674,800	105,191,900	137,181,500	153,080,700	63,386,100	77,083,200	130,044,100	54,094,000	95,329,240	17,111,600	23,724,440	46,611,600	20,228,000	54,182,500	1,382,327,590
FY92	103,612,700	105,175,800	104,103,100	105,741,800	106,869,400	140,681,700	155,934,000	61,053,000	78,498,200	129,041,800	52,635,900	93,170,000		21,165,900				1,401,346,600
FY93	104,610,228	97,362,300	102,039,200	102,785,395	105,885,800	140,275,000	153,555,300	60,334,400		1 .		90,094,600		24,623,700				1,388,206,172
FY94	99,994,100	75,083,100	98,156,900	91,607,800	93,671,400	126,439,100	140,213,900			115,719,700	ł	87,868,300		19,244,100				
FY95	117,949,700	68,908,100	115,358,700	104,187,500	102,308,300	141,348,900	147,788,900	1		128,802,200		100,424,400		23,173,800			51,323,400	1,385,933,996
FY96	125,047,900	55,550,500	129,118,200	103,113,100	106,158,000	142,485,500	100,031,500	68,182,700	80,266,000		50,345,100	95,047,900	7,152,620	22,803,400			51,382,800	1,341,763,220
FY97	103,065,700	63,195,800	116,976,600	91,590,200	103,636,700	141,103,600	133,956,600		77,677,200		47,439,800	10,526,600	15,381,400	24,099,800	48,925,600	3,166,500	51,146,000	1,213,035,110
FY98	115,684,000	58,471,500	119,211,700	88,388,000	104,434,700	129,709,500	137,341,100	63,132,100	69,450,500	120,372,500	51,393,600	12,100	15,379,800	21,415,000	51,647,100	200	49,964,500	1,196,007,900

TABLE 3 - 9

VOC MASS LOADING SUMMARY TGRS, TCAAP NEW BRIGHTON, MINNESOTA

	% Contribution to VOC	FY 1998 Total Pounds VOC
Well	Mass Removal	Mass Romoved
B1	3.5	214
B2	0.4	22
B3	0.5	31
B4	20.3	1246
B5	21.7	1329
B6	6.6	406
B7	0.0	2
B8	0.3	17
B9	1.7	107
B10	0.1	7
B11	0.0	2
B12	(Shut down)	0
SC1	2.0	123
SC2	0.7	45
SC3	0.1	8
SC4	(Shut down)	0
SC5	41.9	2571
Fiscal Yea	ar 1998 Total (lbs)	6132
Daily Ave	rage (lbs/day)	17

HISTORICAL TOTAL

	Pounds VOC Mass
Fiscal Year	Removed
1998	6,132
1997	6,210
1996	10,655
1995	13,355
1994	15,070
1993	20,165
1992	24,527
1991	26,760
1990	18,005
1989 (First year of full scale system)	19,510
1988	4,800
1987	2,100
Total	167,289

TABLE 4 - 1

SUMMARY OF MONTHLY VOC REMOVAL FOR FISCAL YEAR 1998 PGRS, TCAAP NEW BRIGHTON, MINNESOTA

Month	VOC Influent ^{1,2} (µg/L)	Water Treated (million gallon)	Total VOCs Into Treatment Center (lbs)	VOC Effluent ¹ (µg/L)	Total VOCs Out Of Treatment Center (lbs)		Total VOCs Removed By Carbon System (lbs)
October	1.76	44.166	0.65	0.0	0.00		0.65
November	1.45	47.718	0.58	0.0	0.00		0.58
December	1.48	44.011	0.54	0.0	0.00		0.54
January	1.71	44.277	0.63	0.0	0.00		0.63
February	1.91	39.894	0.64	0.90	0.30		0.34
March	1.29	42.889	0.46	0.0	0.00		0.46
April	1.09	37.172	0.34	0.0	0.00		0.34
May	0.74	18.045	0.11	0.0	0.00		0.11
June	0.65	41.482	0.23	0.0	0.00		0.23
July	0.98	28.861	0.24	0.0	0.00		0.24
August	1.06	42.302	0.37	0.0	0.00		0.37
Setember	1.58	46.951	0.62	0.0	0.00		0.62
						Total	5.11

Notes:

¹ VOC concentrations do not include estimated concentrations for compounds detected below the reporting limit

² Concentration is an average, if more than one sample was collected during the month.

² Number reflects quarterly volume.

Table 4-2

Fiscal Year 1998 Water Quality Data, PGRS, TCAAP

	Sample Date	111TCE 200.0	112TCE 3.0	11DCE 6.0	11DCLE 70.0	12DCE ¹ 70.0	12DCLE	12DCLP	C2H3CL	CCL4	CH2CL2	CHCL3	TCLEE	TCLTFE	TRCLE 5.0
ARAR															
Site ID															
NB13E	10/07/97	< 0.76	< 0.78	< 1.7	< 0.73	< 0.76	< 1.1	< 1 T	< 1.01	< 0.99	< 7.4	< 0.5	< 0.75	< 1 T	< 0.56
NB13E	11/4/97	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	12/2/97	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	1/6/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	2/3/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	0.899 ?
NB13E	3/3/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	4/7/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	5/28/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	6/2/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	7/7/98	< 0.76	< 0.78	< 1.7	< 0.73	< 0.76	< 1.1	< 1 T	< 1.01	< 0.99	< 7.4	< 0.5	< 0.75	< 1 T	< 0.56
NB13E	8/4/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13E	9/1/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	< 0.56 ?
NB13I	10/7/97	< 0.76	< 0.78	< 1.7	< 0.73	< 0.76	< 1.1	< 1 T	< 1.01	< 0.99	< 7.4	< 0.5	< 0.75	< 1 T	1.76
NB13I	11/4/97	< 0.76 D?	< 0.78 ?	< 1.7 D?	< 0.73 D?	< 0.76 ?	< 1.1 D?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 ?	< 0.5 D?	< 0.75 ?	< 1 DT?	1.36 ?
NB13I	11/4/97	< 0.76 ?	< 0.78 D?	< 1.7 ?	< 0.73 ?	< 0.76 D?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 D?	< 0.5 ?	< 0.75 D?	< 1 T?	1.54 D?
NB13I	12/2/97	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.54 ?
NB13I	12/2/97	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.42 ?
NB13I	1/6/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.84 ?
NB13I	1/6/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 D?	< 0.76 D?	< 1.1 D?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 D?	< 0.75 D?	< 1 DT?	1.57 D?
NB13I	2/3/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.91 ?
NB13I	3/3/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 ?	< 0.76 D?	< 1.1 D?	< 1 DT?	< 1.01 ?	< 0.99 D?	< 7.4 ?	< 0.5 D?	< 0.75 D?	< 1 T?	1.23 D?
NB13I	3/3/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 D?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 D?	< 0.99 ?	< 7.4 D?	< 0.5 ?	< 0.75 ?	< 1 DT?	1.34 ?
NB13I	4/7/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.07 ?
NB13I	4/7/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 D?	< 0.76 D?	< 1.1 D?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 D?	< 0.75 D?	< 1 DT?	1.11 D?
NB13I	5/28/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 ?	< 0.76 D?	< 1.1 ?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 ?	< 0.75 D?	< 1 DT?	0.729 D?
NB13I	5/28/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 D?	< 0.76 ?	< 1.1 D?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 D?	< 0.75 ?	< 1 T?	0.741 ?
NB13I	6/2/98	< 0.76 ?	< 0.78 D?	< 1.7 D?	< 0.73 D?	< 0.76 D?	< 1.1 D?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 D?	< 0.75 D?	< 1 DT?	0.621 D?
NB13I	6/2/98	< 0.76 D?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	0.681 ?
NB13I	7/7/98	< 0.76	< 0.78	< 1.7	< 0.73	< 0.76	< 1.1	< 1 T	< 1.01	< 0.99	< 7.4	< 0.5	< 0.75	< 1 T	1.01
NB13I	7/7/98	< 0.76 D	< 0.78 D	< 1.7 D	< 0.73 D	< 0.76 D	< 1.1 D	< 1 TD	< 1.01 D	< 0.99 D	< 7.4 D	< 0.5 D	< 0.75 D	< 1 TD	0.953 D
NB13I	8/4/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	0.98 ?
NB13I	8/4/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 D?	< 0.76 D?	< 1.1 D?	< 1 T?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 D?	< 0.75 D?	< 1 T?	1.14 D?
NB13I	9/1/98	< 0.76 ?	< 0.78 ?	< 1.7 ?	< 0.73 ?	< 0.76 ?	< 1.1 ?	< 1 T?	< 1.01 ?	< 0.99 ?	< 7.4 ?	< 0.5 ?	< 0.75 ?	< 1 T?	1.47 ?
NB13I	9/1/98	< 0.76 D?	< 0.78 D?	< 1.7 D?	< 0.73 D?	< 0.76 D?	< 1.1 D?	< 1 DT?	< 1.01 D?	< 0.99 D?	< 7.4 D?	< 0.5 D?	< 0.75 D?	< 1 DT?	1.68 D?

Notes:

Units in μ g/l.

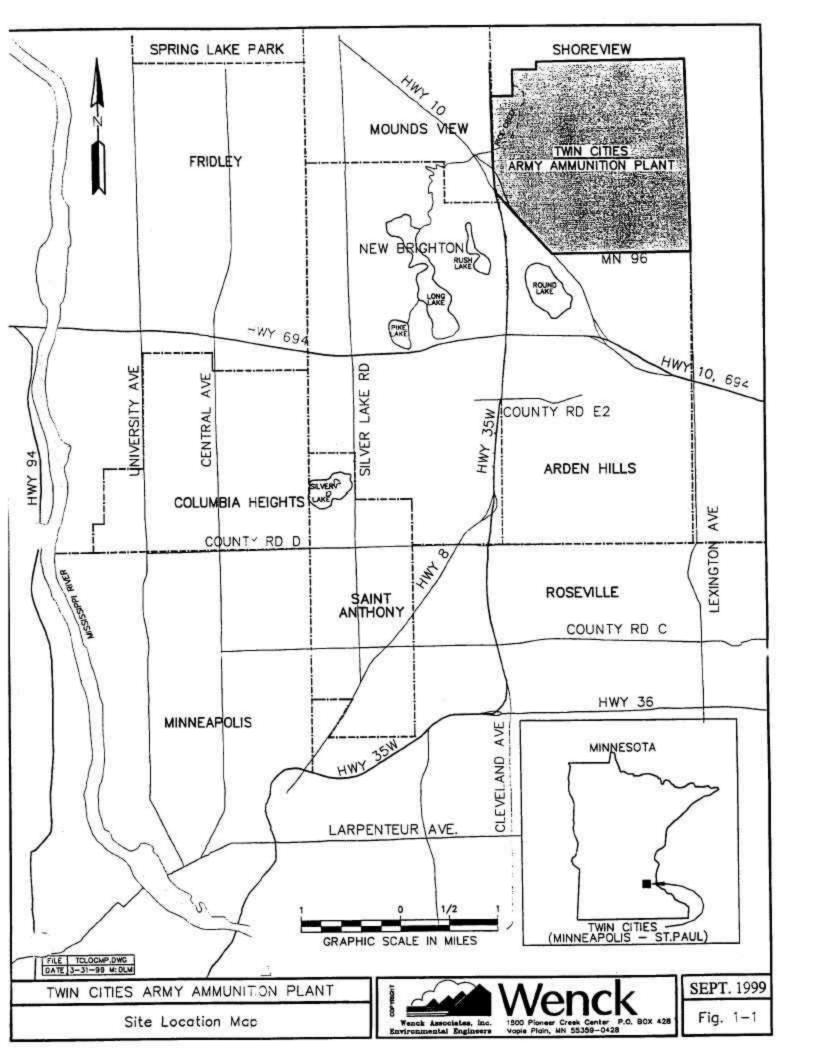
ARARs (Applicable or Relevant and Appropriate Regulation) from Table 2.2, TCAAP OU-3 Feasibility Study, July 1992

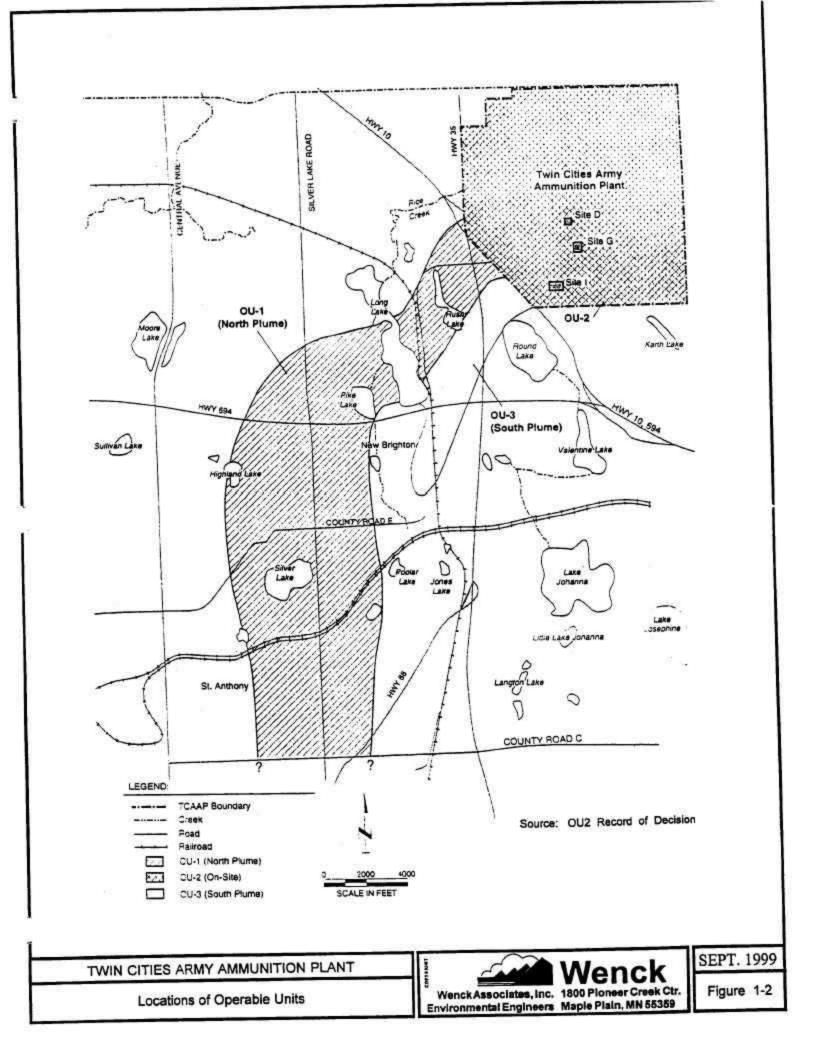
¹ - ARAR of 70 is for cis-1,2-dichloroethene

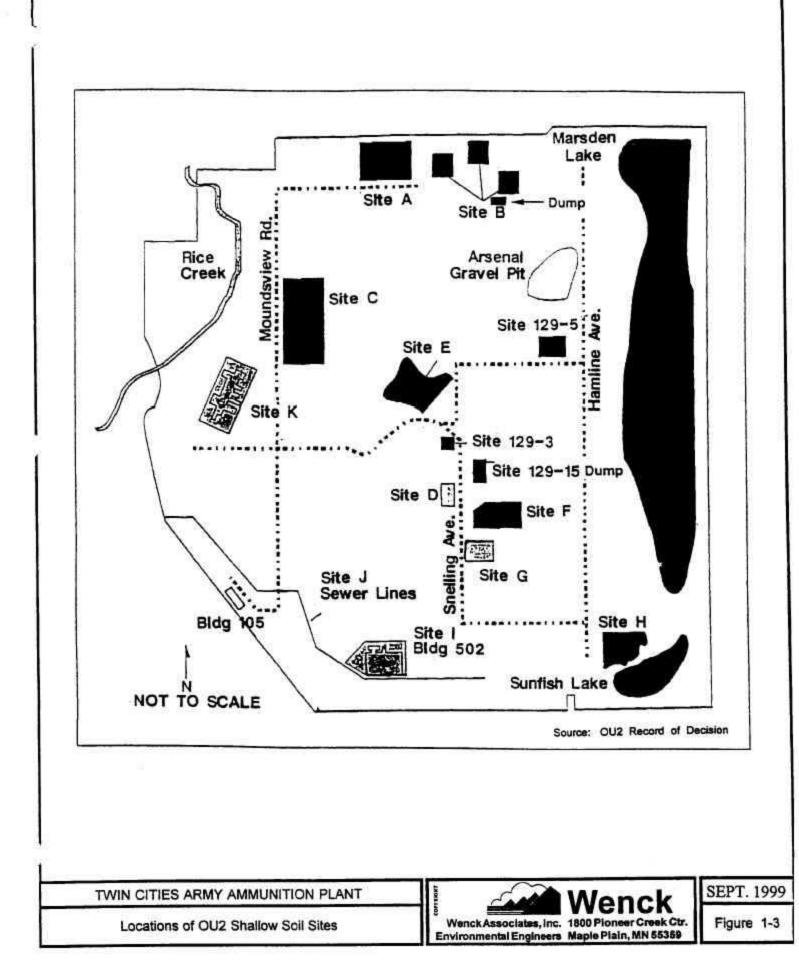
D - Duplicate analysis

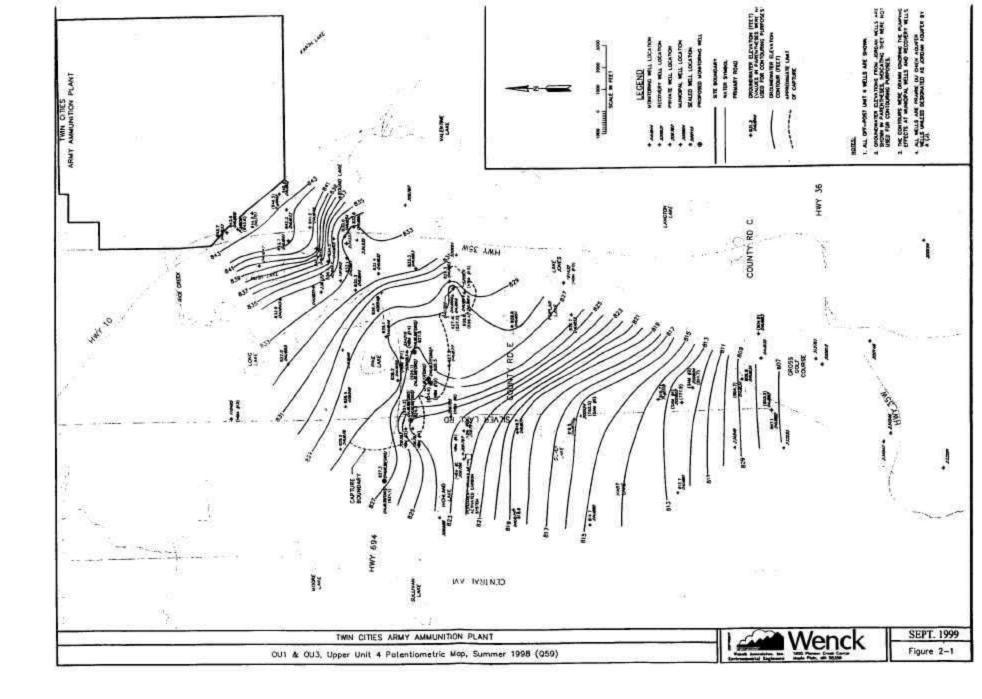
T - Non-target compound analyzed for but not detected (non-GC/MS methods)

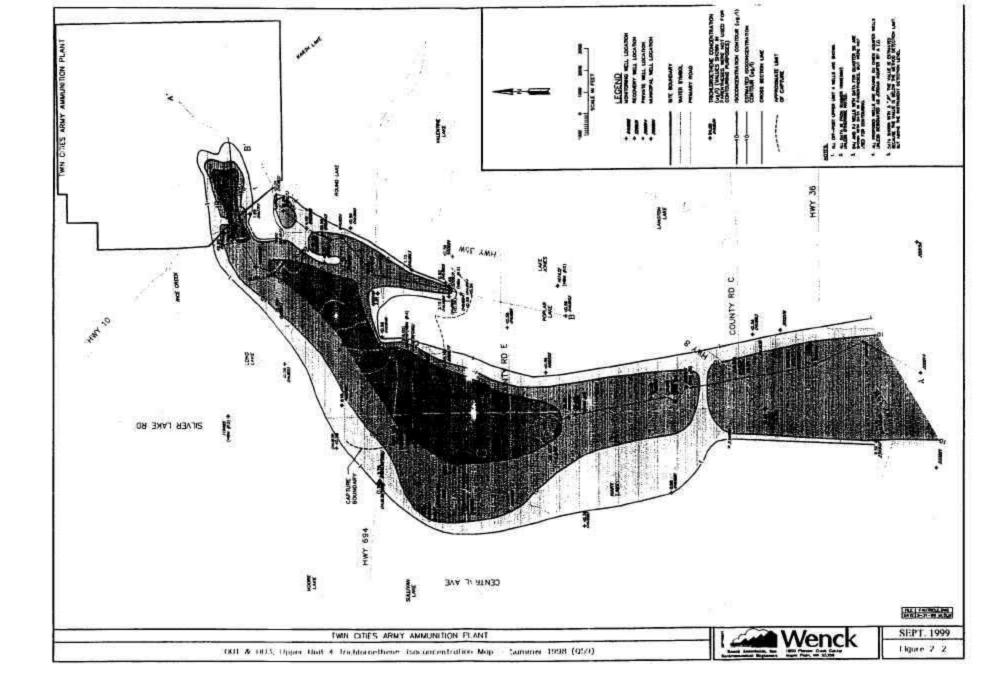
? - Control chart not yet approved by USAEC

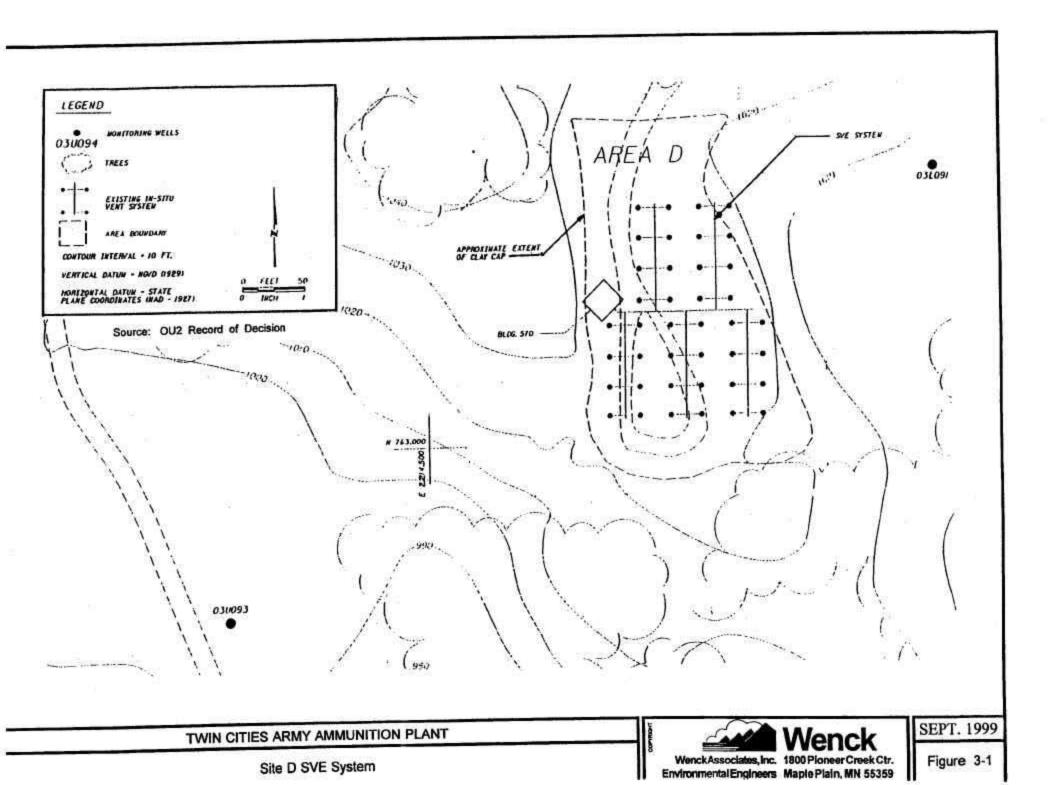


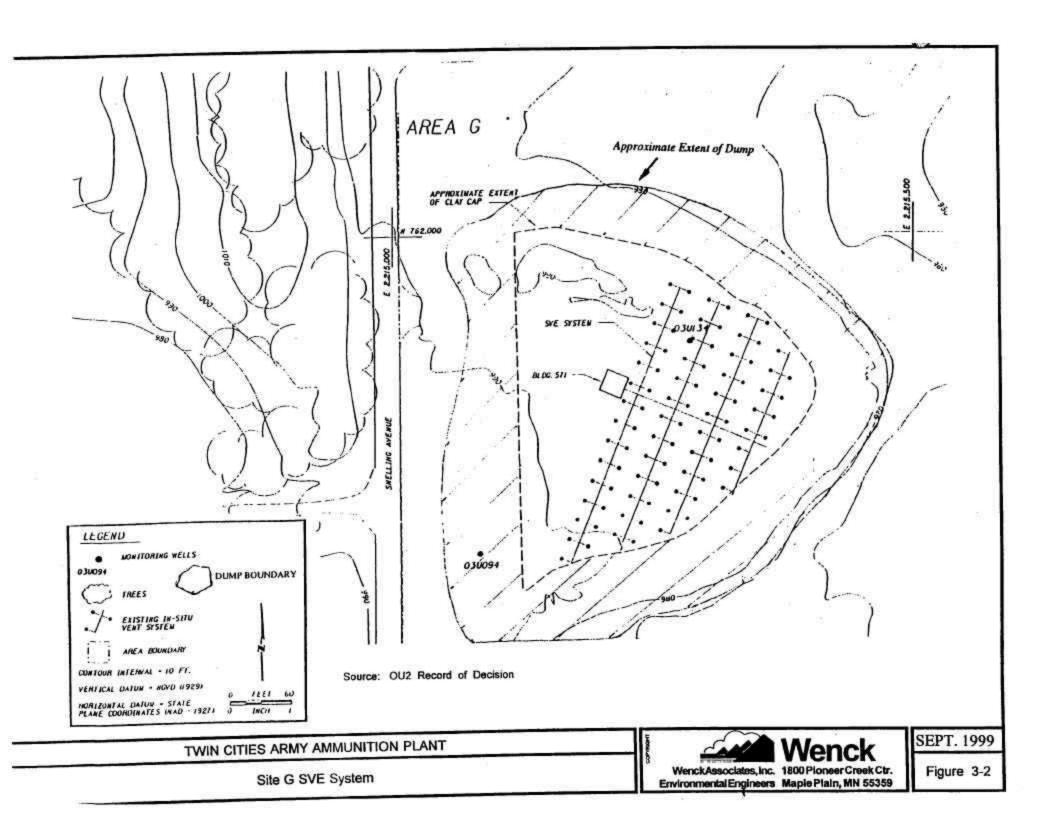


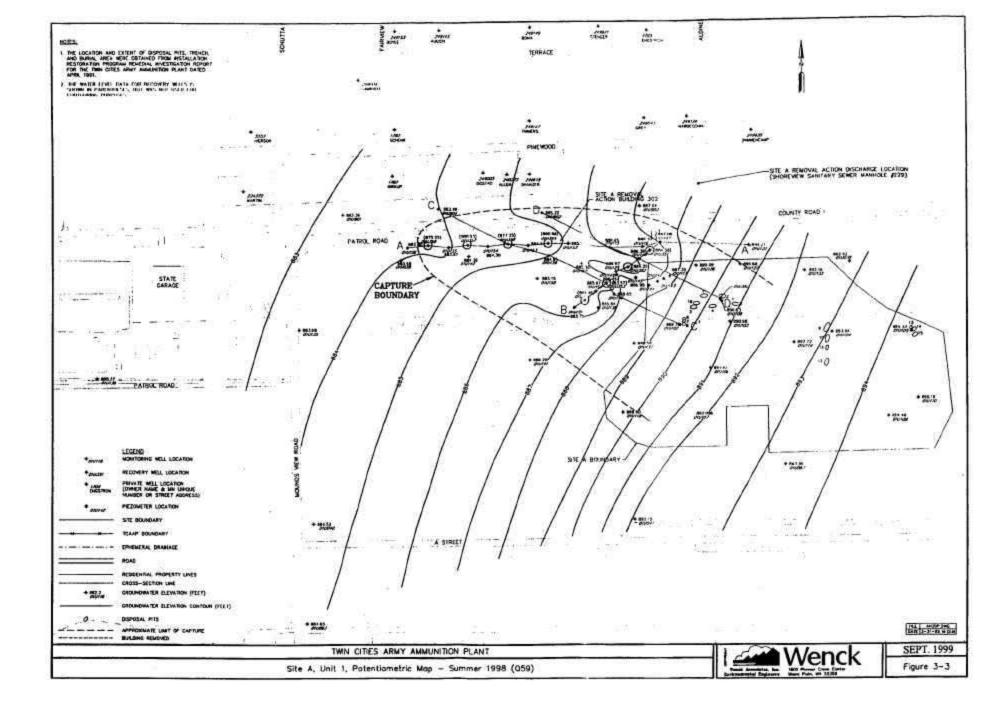


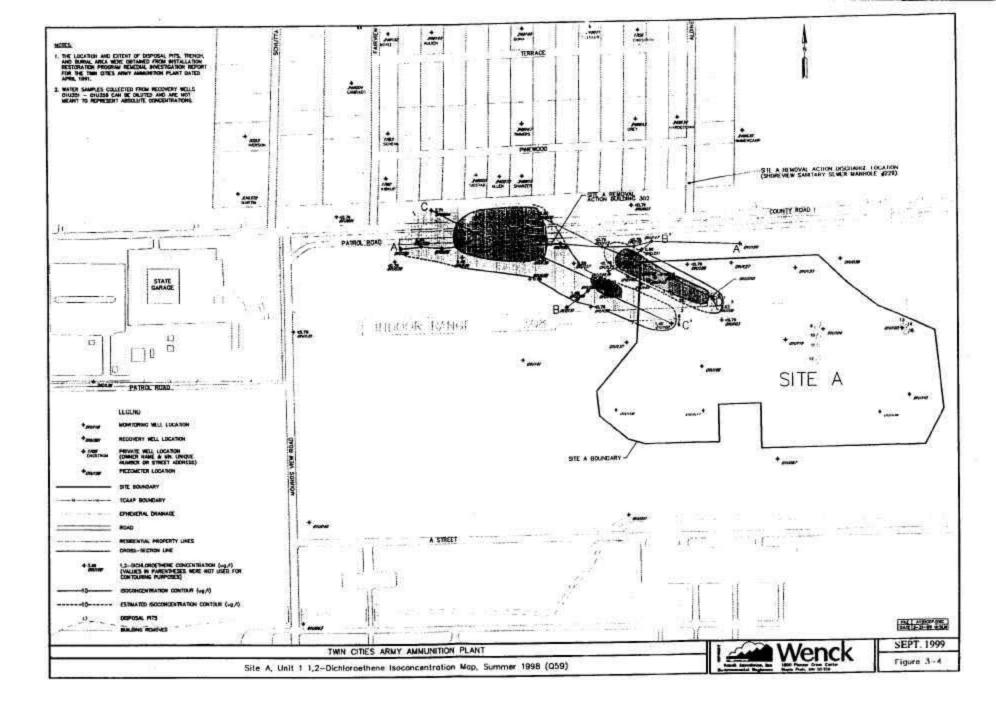


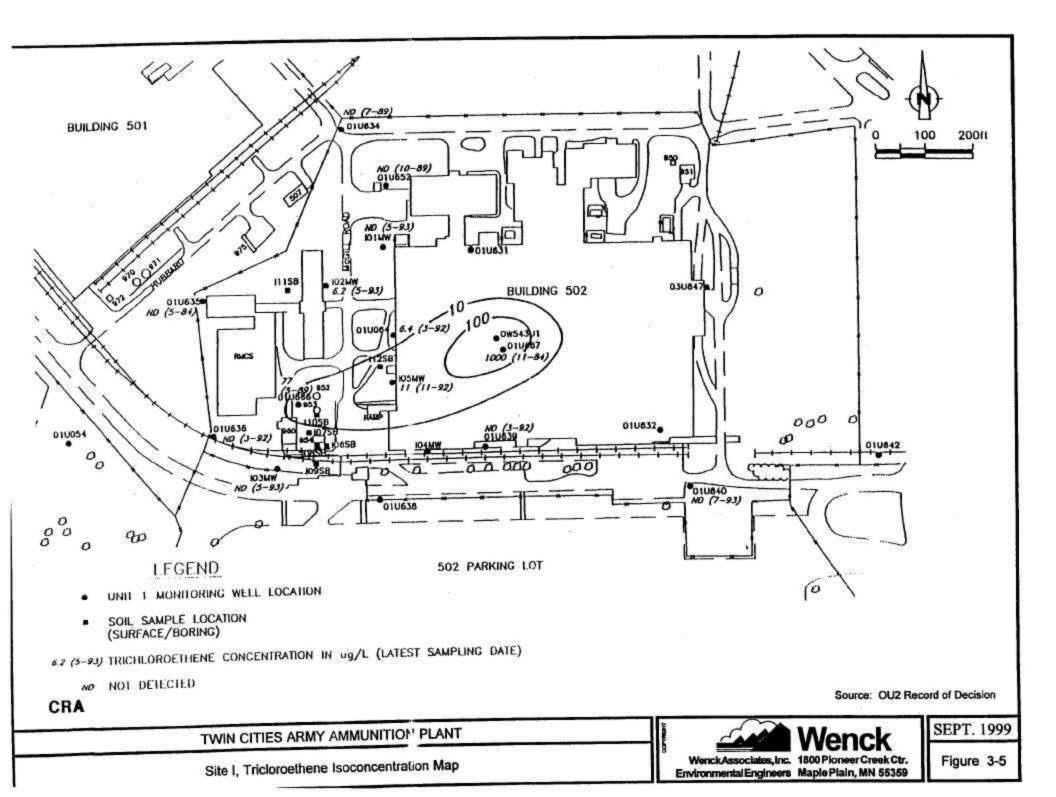


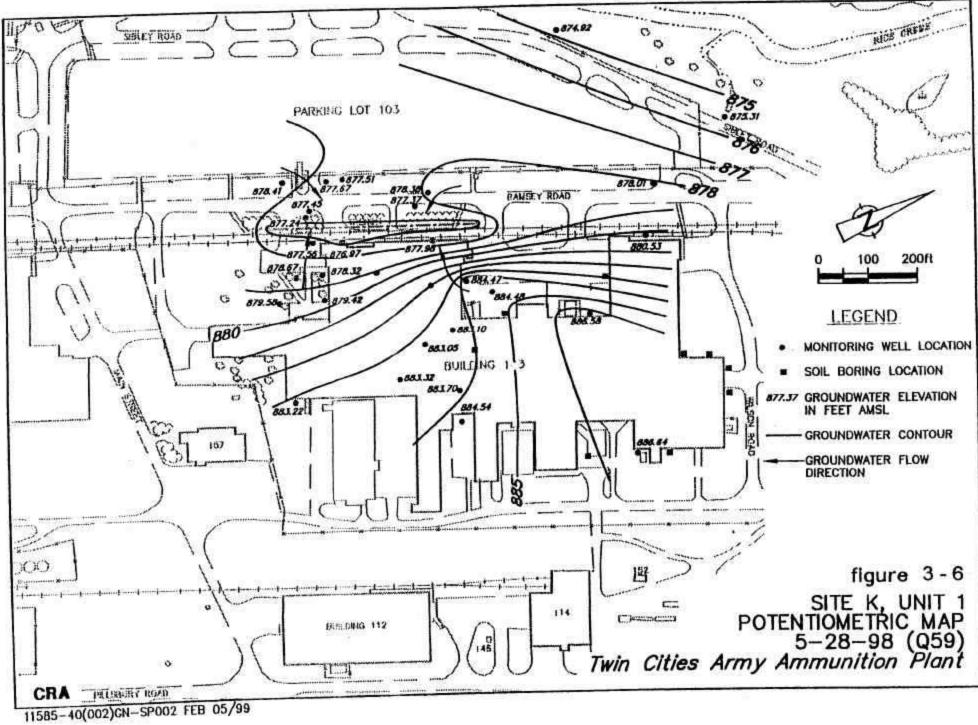


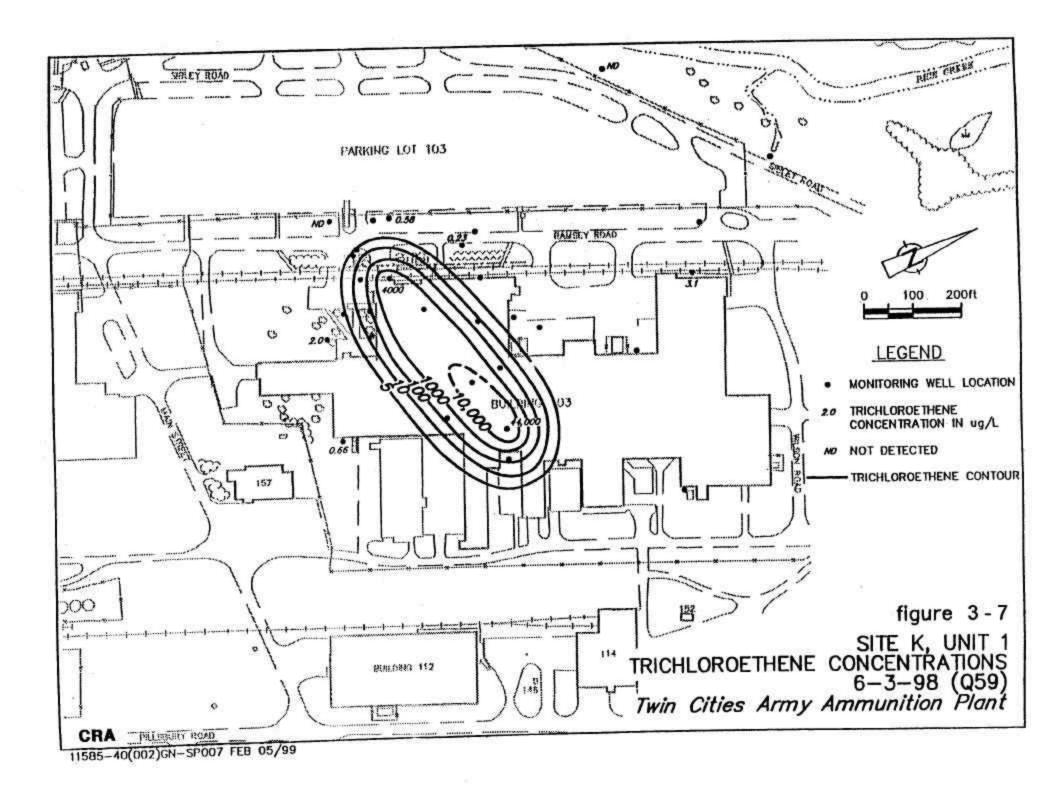


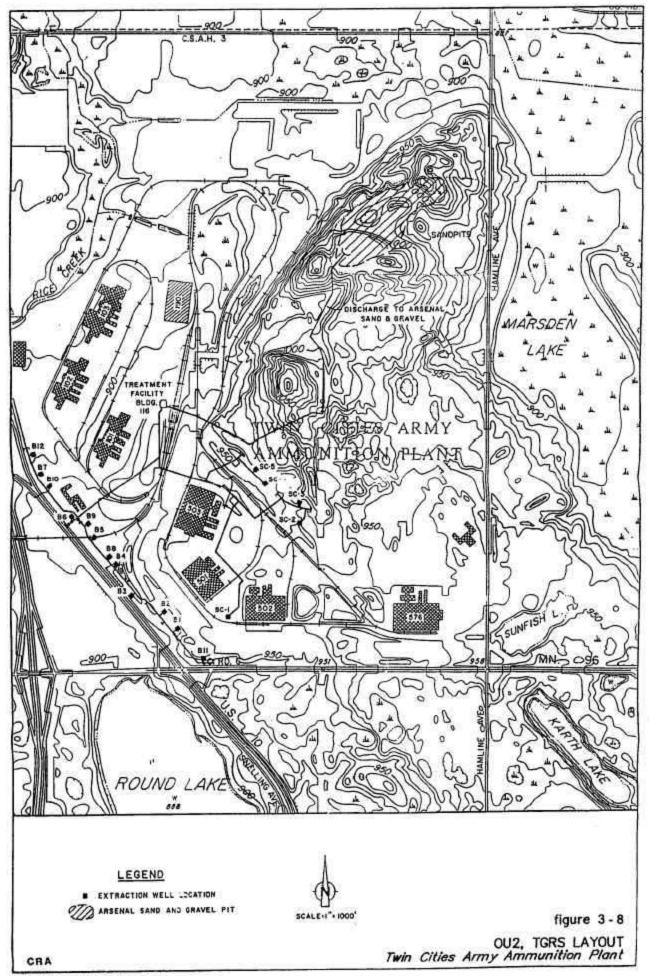




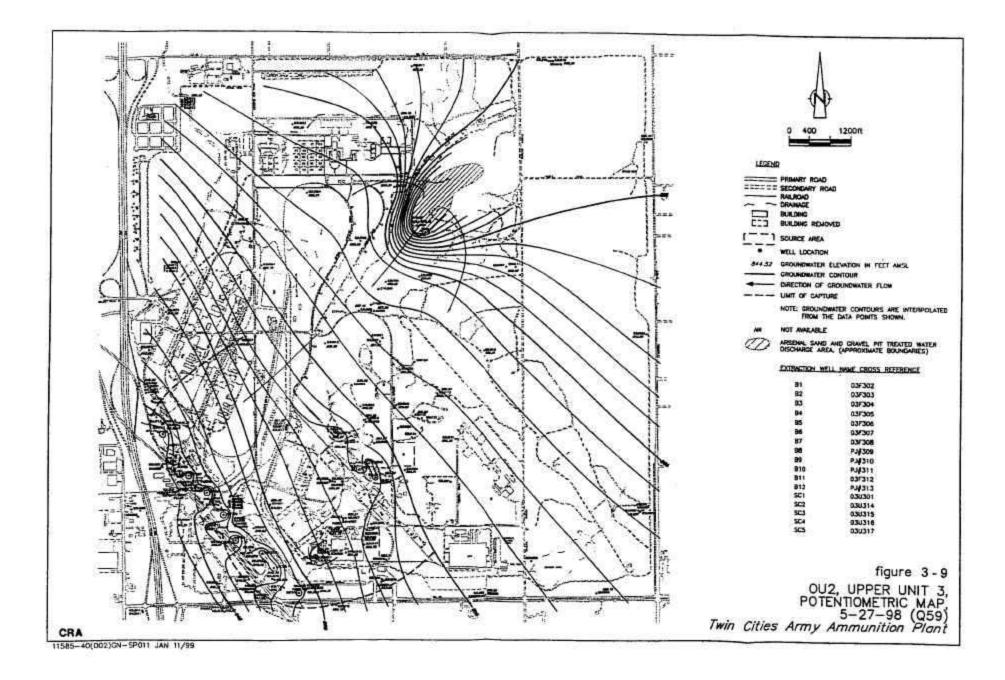


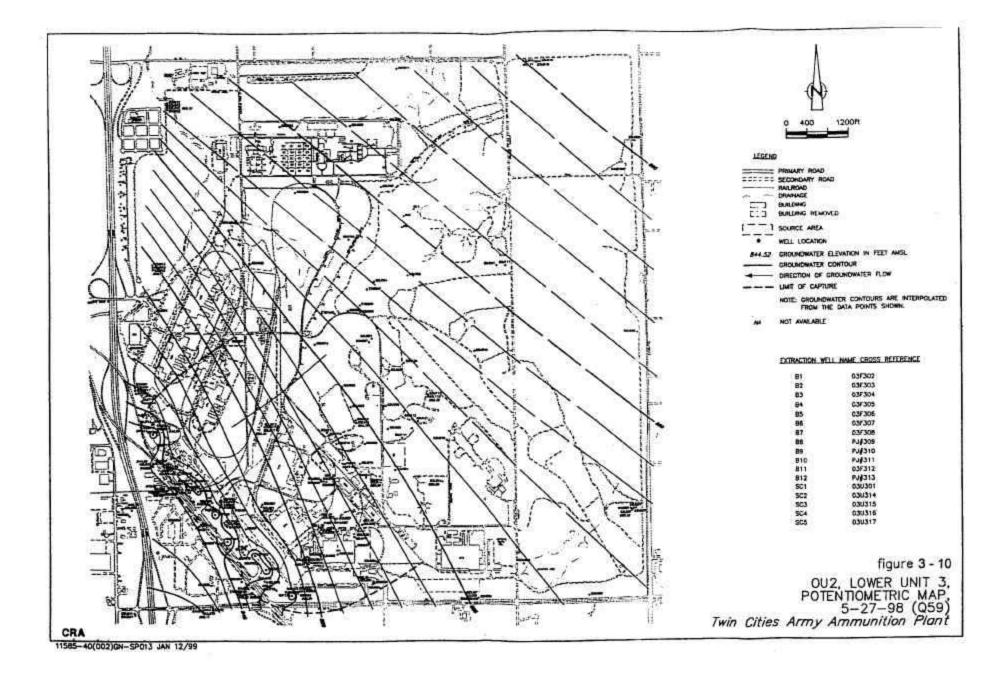


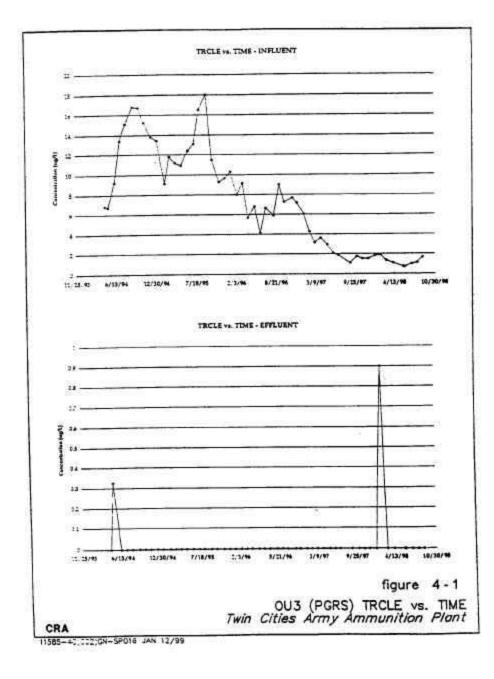


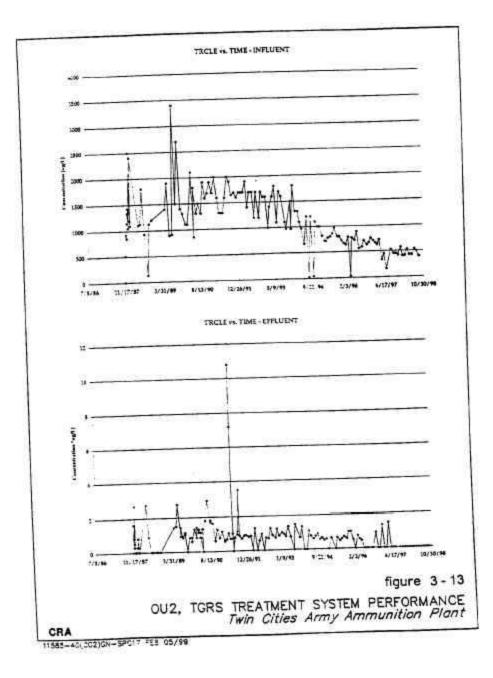


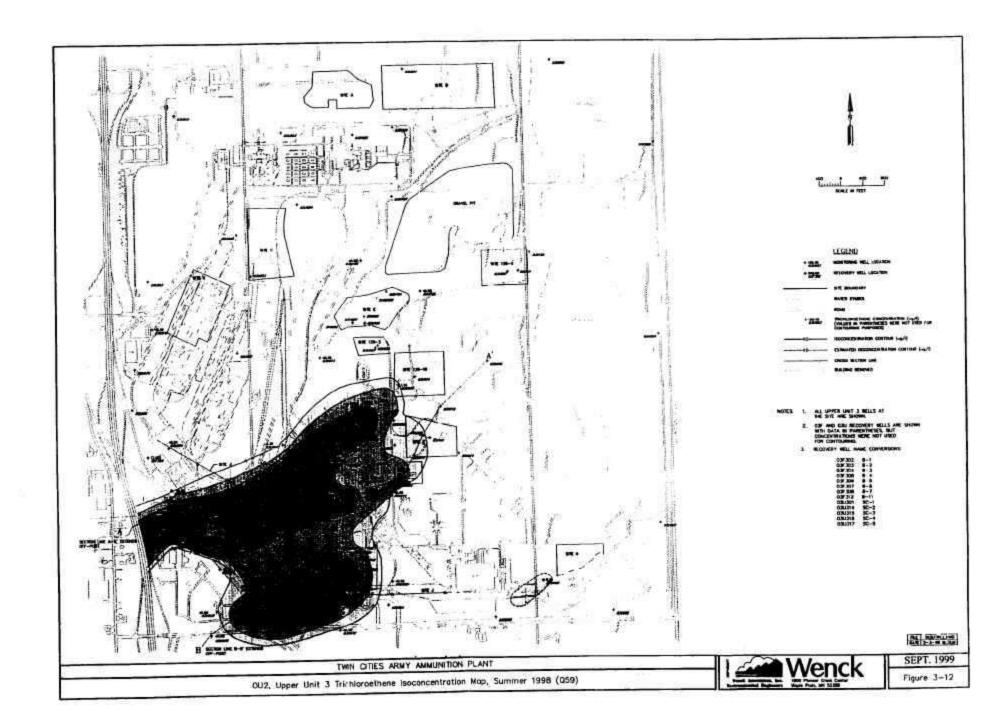
11585-40(002)GN-SP JAN 11/99

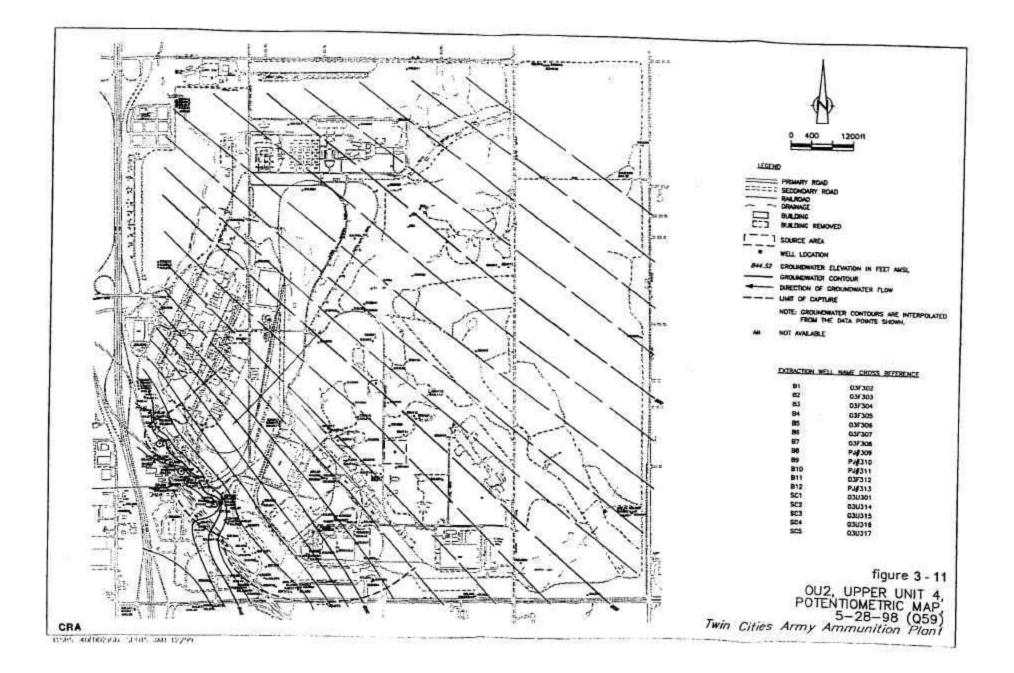












A.1 List of Attendees for Site Inspection

Five-Year Review Site Visits Tuesday, 16 March 1999 - 8:00 A.M. Government Conference Room - Bldg. 105

Name	<u>Organization</u>	Telephone No.
MATT BOWERS	WENCK	612-479-4230
Martin Miller	TCHAP	451-632-2001×1651
PETE RISSELL	USAEC	(410) 436 1603
DAVE Gostin	ATIC	612 931 6973
KETH Benker	WERK	612- 479- 4206
JIM SEABSRG	MPCA	657-296-7823
DAN GOR	CRA	651-639-0913
Morek Ferring	MPCA	651-296-7775
Tan BAROLEWIS	U.S. EPA	
Dagman Romany	HPCA	651-296-7776
Bank Gabboick	MPCA_	651-296-7745
Jim Kerson	Alleast	<u>151 - 133 - 2301 ×1631</u>
ASON TWADDLE	CRA	651- 6 39-0913
Charles F. Coste	L'RA	651-639-0913
Ken Christenson	USTCE.	(402) 221-7828
Paul Estresta	Moch	651-296-2997
· · · · · · · · · · · · · · · · ·		
		, ", "
		·····
,		

A.2 OU1

Five-Year Review Site Inspection Checklist

(Working document for site inspection. Information may be filled in by hand and attached to the fiveyear review report as supporting documentation of site status.)

FORMATION
Date of inspection: March 16, 1999
USEPA ID: MN 7213820908
Weather/temperature:
tached
(Check all that apply)
Public Works Superintendent N/A
Títle Date
by phone Phone no. <u>(651) 638-2113</u>
reatment Plant Operator 3/16/99
Title Date
by phone Phone no. <u>(651) 638-2065</u>

Name	-	Title	Date	
uggestions:	🖸 Report atta	ched		Phone no.
			·	
				<u> </u>
	-			Phone no.
uŝŝestrone" .				
Name	8	Title	Date	Phone no.
uggestions;	🖾 Report attac	:bed		·
		•		
Name	<u> </u>	Title		Phone no.
	_			
ierite (optional		ottoobad	·····	
				·
	Nam uggestions; Nam uggestions; uggestions; iews (optiona (4	Name uggestions;	Name Title uggestions; □ Report attached iews (optional) □ Report attached.	Name Name nggestions; Report attached Name Title Date uggestions; Report attached Name Title Date uggestions; Report attached iews (optional) Report attached.

	III. ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
1.	O&M Manual and As-Builts
	O&M Manual 🗈 Readily available 🔄 Up to date 🗖 N/A
	As-builts 🛛 🖪 Readily available 🖾 Up to date 🗖 N/A
	Maintenance Logs 🗉 Readily available 🖾 Up to date 🗖 N/A
	Remarks
-	Site Specific Health and Safety Plan 🖾 Readily available 🖾 Up to date 🗆 N/A
	□ Contingency plan/cmergency response plan □ Readily available □ Up to date N/A
	Remarks
3.	O&M and OSHA Training Records 🗵 Readily available 🖻 Up to date 🗆 N/A
	Remarks
4	Permits and Service Agreements
1	□ Air discharge permit □ Readily available □ Up to date 🗷 N/A
	□ Effluent discharge □ Readily available □ Up to date ⊠ N/A
	2 Waste disposal, POTW
	□ Other permits (see remarks) ☑ Other permits (see remarks) ☑ Readily available ☑ Up to date □ N/A
	Remarks
	1) A MDNR permit exists for groundwater appropriation.
ļ	2) A RCRA Hazardous Waste Generator permit exists for the spent granular activated carbon. Spent
	carbon is returned to the original, clean carbon supplier for regeneration.
Į –	
5	Gas Generation Records
1	Remarks
l	
6.	Settlement Monument Records 🔲 Readily available 🖾 Up to date 🖾 N/A
	Remarks
1.	Groundwater Monitoring Records Readily available Up to date N/A Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual
P	Remarks <u>Groundwater monitoring results are bocamented of the Fickart Fiscal Feat 1220 Allands</u>
18	Leachate Extraction Records
1	Remarks
9.	Discharge Compliance Records
ļ	□ Air □ Readily available □ Up to date □ N/A
	☑ Water (effluent) ☑ Readily available ☑ Up to date □ N/A
	Remarks
1	
1	

10. Daily Access/Security Logs	
Se Readily available 🗘 Up to date 🖾 N/A	
Remarks Dally Access is not logged but security alarms operable.	
IV. O&M COSTS	
1. O&M Organization	
□ State in-house □ Contractor for State	
PRP in-house Contractor for PRP	į
Other <u>City of New Brighton</u>	<u> </u>
2. OdeM Cost Records	<u> </u>
Readily available B Up to date	
B Funding mechanism/agreement in place	
• •	own attached
The state of the second st	ie den antrollên
Total annual cost by year for review period if available	
From Jan. 1994 To Dec. 1994 \$760.900.00 Bre	akdown attached
Dates Total cost	algown attached
	akdown attached
Dates Total cost	
From Jan. 1996 To Dec. 1996 \$672.259.00.	akdown attached
Dates Total cost	
From Jan. 1997 To Dec. 1997 \$1.076.812.00 @ Bre	akdown attached
Dates Total cost	
	akdown attached
Dates Total cost	
* This cost is misleading. No carbon changeout cost has been incurred in the first ha relatively large cost.	lf of 1998, which is a
3. Unanticipated or Unusually High O&M Costs During Review Period Describe costs and reasons:	<u> </u>
O&M costs appear to be slightly higher than the original estimate; however, carbo	n changes and now
occurring at 6 to 8 month intervals rather than the 12 month interval in the origin	al estimate. Also, two
carbon exchanges were paid for in 1997 and no carbon exchanges were paid for it	1996. resulting in the
significant cost difference between these two years.	
	•··•
	· · · · · · · · · · · · · · · · · · ·

V. GENERAL SITE CONDITIONS
Whenever possible, actual site conditions should be documented with photographs.
A. Fencing
1. Fencing damaged Location shown on site map Gates secured N/A Remarks
B. Site Access
 Access restrictions, signs, other security measures I Location shown on map I N/A Remarks <u>When not attended</u>, treatment building is locked and also has security alarms.
C. Perimeter Roads
1. Roads damaged Remarks N/A
D. General
1. Vandalism/trespassing Location shown on site map No vandalism evident Remarks
2. Land use changes onsite E N/A Remarks
3. Land use changes offsite Z N/A Remarks
 Institutional controls (site conditions imply institutional controls not being enforced) Institutional controls are in place (see Section IX). Agency
Contact Title Date Phone no.
Problems; suggestions;
VI. LANDFILL COVER
VII. VERTICAL BARRIER WALLS
VIII. GROUNDWATER/SURFACE WATER REMEDIES E Applicable
A. Groundwater Extraction Wells, Pumps, and Pipelines
Applicable Not applicable I. Pumps, Wellhead Plumbing, and Electrical
Pumps, we need Fluinbing, and Electrical Societation Societation Societation Societation Remarks
 2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances [2] Good condition

B.	Surface Water Collection Structures, Pumps, and Pipelines
	□ Applicable 🗵 Not applicable
1.	Collection Structures, Pumps, and Electrical
	🗇 Good condition 🛛 🗁 Needs O&M
	Remarks
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances
F	Good condition 🛛 Needs O&M
ļ.	Remarks
C .	Treatment System B Applicable D Not applicable
1.	Treatment Train (Check components that apply)
1	□ Metals removal □ Oil/water separation □ Bioremediation
í	🖸 Air stripping 🛛 🖾 Carbon adsorbers
	Filters Others
	⊠ Good condition □ Needs O&M
ļ	Sampling ports properly marked and functional
1	Sampling/maintenance log displayed and-up to date (not displayed)
	Equipment properly identified
	Quantity of groundwater treated annually <u>Target Volume- 1.15 Billion gallans/year</u>
[Quantity of surface water treated annually <u>N/A</u>
	Remarks <u>Treatment system is referred to as the Permanent Granular Activated Carbon System</u>
ł	or "PGAC."
[
	Sampling and maintenance information is maintained in a computer database that is accessible via
	the computers in the PGAC treatment system office.
i i	
<u> </u>	
2.	Electrical Enclosures and Panels (properly rated and functional)
1	☑ Good condition □ Needs O&M
	Remarks
3.	Tanks, Vauits, Storage Vessels 🛛 N/A
	🖬 Good condition 🛛 📮 Proper secondary containment 🖓 🖬 Needs O&M
[Remarks
4.	Discharge Structure and Appurtenances 🔲 N/A.
1	🗷 Good condition 🛛 Directs O&M
	Remarks
5.	Treatment Building(s) 🗆 N/A
	Good condition
	E Chemicals and equipment properly stored
	Remarks

 6. Monitoring Wells (pump and treatment remedy) E Properly secured/locked E Functioning E Routinely sampled Good condition E All required wells located Needs O&M I N/A Remarks
D Needs O&M D N/A
D. Monitored Natural Attenuation
1. Monitoring Wells (natural attennation remedy) Properly secured/locked
Functioning Routinely sampled
□ Good condition □ All required wells located □ Needs O&M N/A
Remarks
IX. OTHER REMEDIES
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the
physical nature and condition of any facility associated with the remedy. An example would be soil vapor
extraction. (See additional remedy components below.)
A. Alternative Water Supply/Well Abandonment
1. Well Inventory Records 🖾 Readily available 🖾 Up-to-Date
Remarks
2. O&M Organization
□ State in-house □ Contractor for State
PRP in-house E Contractor for PRP
□ Other
3. Program Status
a. Number of well owners previously connected to an alternate water supply:
 b. Number of well owners currently scheduled to receive alternate water supply: <u>2</u> c. Number of wells previously abandoned: <u>8</u>
d. Number of wells currently scheduled to be abandoned: <u>2</u>
e. Number of well owners yet to be contacted to be offered an alternate water supply/well abandonment: _0
4. Groundwater Monitoring Network
a. Adequacy to detect plume size increase, if it occurred 🗷 Adequate 🗍 Not adequate
Remarks
B. Drilling Advisory
I. MDH Special Well Construction Area (MDH SWCA)
a. MDH SWCA currently in place 🛛 🖾 yes 🗖 no
b. MDH SWCA encompasses entire plume 🖾 yes 🗆 no
Remarks: <u>Revision of the MDH SB/CA boundary to more closely match the area of concern are</u>
anticipated to be completed in 1999.

	X. OVERALL OBSERVATIONS				
A.	Effectiveness of the Remedy				
	Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.). The OUI groundwater recovery system (New Brighton Municipal Wells NBM#4, NBM#14 and NBM#15 was completed in August 1998. Performance monitoring is currently underway. System effectiveness will be evaluated when initial performance monitoring has been completed.				
B .	Adequacy and the Continued Need for O&M Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy. O&M procedures are adequate to ensure the short- and long-term protectiveness of the remedy.				
	system operation has provided reliable treatment of the water to drinking water standards.				
C.	Early Indicators of Potential Remedy Failure				
	Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future. None.				

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. Optimization will be evaluated after initial performance monitoring is completed (see Item A above).

N:\0003\60\01\5YR_REV\OU1\OU1.DOC-rlb

ANNUAL FINANCIAL SUMMARIES WATER TREATMENT PLANT #1, FUND 206 3001 5th Street N.W.

				3001	5th Street N.W.					_	
1:\Shared\Army\1999\Plant1 July 29, 1998		1994 Actual	1995 Actual	1996 Actual	1997 Budget	1997 Actual	1998 Budget	Thru June	1999 Budget	Percent Change 98/99	2000 Budget
MATERIALS AND SUPPLIES		Actual	Actual	Actual	Budget	Actual	Budget	June	Duuget	98/99	Duugei
General Materials	2170	\$26,200	\$4,338	\$6,285	\$2,100	\$2,805	\$2,200	\$736	\$2,200	0.00%	\$2,30
Chemicals	2175	,	\$33,345	\$15,214	\$32,100	\$26,526	\$20,800	\$9,145	\$22,300	7.21%	\$23,00
1995 chem. correction.			,.	(\$5,751)	,			,	, ,		,
Small Equipment	2280	\$200	\$0	\$0	\$2,800	\$0	\$2,900	\$0	\$2,800	-3.45%	\$2,90
TOTAL		\$26,400	\$37,683	\$15,748	\$37,000	\$29,331	\$25,900	\$9,881	\$27,300	5.41%	\$28,20
CONTRACTUAL SERVICES Professional Services	3300										
Telephone	3310	\$1,100	\$2,206	\$6,510	\$6,600	\$7,077	\$6,800	\$3,527	\$7,400	8.82%	\$7,60
Utility Charges	3320	\$78,700	\$102,981	\$91,595	\$159,500	\$115,196	\$118,000	\$43,992	\$123,600	4.75%	\$127,30
Waste Removal	3350	\$78,700	\$102,981	\$609	\$139,300	\$115,190	\$118,000	\$228	\$123,000	-14.29%	\$127,30
Subscriptions &	3330	\$700	\$707	\$009	\$700	\$550	\$700	\$228	\$000	-14.2970	\$00
Memberships	3360		\$0	\$0	\$300	\$0	\$300	\$0	\$300	0.00%	\$30
Training	3370		\$0 \$0	\$0 \$0	\$300 \$300	\$0 \$0	\$300 \$300	\$0 \$0	\$300 \$300	0.00%	\$30
Travel	3370		\$0 \$44	\$0 \$0	\$300 \$0	\$0 \$0	\$300 \$100	\$0 \$0	\$300 \$100	0.00%	\$30
		¢0,000									
Insurance	3483	\$8,900 \$1,100	\$11,000	\$12,990 \$16,560	\$21,600	\$6,862 \$7,072	\$22,200	\$4,876 \$2,860	\$5,000	310.81%	\$5,20 \$70,50
Maint. of Buildings & Grounds	3510	\$1,100	\$1,536	\$16,560	\$2,300	\$7,973 \$55.076	\$2,400	\$2,860 \$0,502	\$68,400	2750.00%	\$70,50
Maint. of Equipment	3520	\$10,900	\$16,361	\$18,030	\$30,900	\$55,076	\$31,800	\$9,503	\$91,200	186.79%	\$93,90
Other Services	3590	\$5,600	\$8,811	¢2.225	.	¢4.025	¢5 400	¢.0	\$5,600	2.70%	ф <u>г</u> . с.
DNR App. Fee				\$3,235	\$6,700	\$4,825	\$5,400	\$0	\$5,600	3.70%	\$5,80
MCES Ind. Chg.			\$796	** * * **	\$100	\$150	\$100	\$150	\$900	800.00%	\$90
SAC				\$14,400	\$100,000	\$0	\$0	\$0	\$10,450		\$
Sanitary Sewer				\$22,541	\$30,000	\$10,269	\$30,900	\$2,402	\$12,000	-61.17%	\$12,40
RC/MPCA Fee				\$931	\$1,500	\$483	\$1,500	\$1,038	\$1,500	0.00%	\$1,50
Chemtrek, Misc.				\$2,568	\$1,500	\$500	\$1,500	\$0	\$1,500	0.00%	\$1,50
Miscellaneous						\$1,492		\$886	\$2,000		
Carbon Contracts	6751	\$187,800	\$191,581	\$6,167	\$390,000	\$379,320	\$401,700	\$0	\$375,000	-6.65%	\$386,30
City Services	6752										
Administration		\$89,900	\$99,000	\$102,700	\$100,457	\$103,104	\$103,500	\$0	\$106,600	3.00%	\$109,80
Operations		\$107,500	\$144,891	\$152,226	\$154,500	\$152,018	\$159,100	\$0	\$163,900	3.02%	\$168,80
Engineering	6752	\$166,600	\$175,999	\$178,691	\$240,000	\$187,266	\$247,200	\$59,426	\$200,000	-19.09%	\$206,000
Legal/Professional Services	6755	\$71,000	\$101,026	\$32,083	\$67,000	\$10,881	\$69,000	\$2,478	\$12,000	-82.61%	\$12,40
Auditing Services	6755	\$4,700	\$340	\$400	\$0	\$0	\$2,000	\$0	\$2,100	5.00%	\$2,20
Capital Outlay - 1/2 floor scrubber	6200		\$2,961								
Corrections				(\$5,725)		\$4,433					
TOTAL		\$734,500	\$860,240	\$656,511	\$1,313,957	\$1,047,481	\$1,204,500	\$131,366	\$1,190,450	-1.17%	\$1,213,40
TOTAL		\$760,900	\$897,923	\$672,259	\$1,350,957	\$1,076,812	\$1,230,400	\$141,247	\$1,217,750	-1.03%	\$1,241,60
Fridley Chemical Feed Project:											
Construction	6751				\$21,002	\$21,002					
Engineering	6752			\$2,497	φ21,002	φ21,002					
TOTAL	0752			\$2,497	\$21,002	\$21,002					
GRAND TOTAL		\$760,900	\$897,923	\$674,756	\$1,371,959	\$1,097,814	\$1,230,400	\$141,247	\$1,217,750	-1.03%	\$1,241,60

1997 Corrections

\$4,433.40 transfer from fund 207 to 206 to correct a 1996 miscoded legal charge

A.3 OU2 Shallow Soil Sites

Five-Year Review Site Inspection Checklist

(Working document for site inspection. Information may be filled in by hand and attached to the five-year review report as supporting documentation of site status.)

I. SITE INF	ORMATION
Site name: Operable Unit 2, Shallow Soll Sites (A, C, E, H, 129-3, 129-5, Dump Sites B and 129-15) New Brighton/Arden Hills Superfund Site	Date of inspection: March 16, 1999
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908
Agency, office or company leading the Five-Year Review: U.S. Army	Weather/temperature:
Remedy Includes (Check all that apply)	
Landfill cover/containment	1
Groundwater pump and treatment	1
Surface water collection and treatment	
Soft vapor extraction (Site A only)	P's CAMU, and off-site disposal
☑ Inspection team roster attached □ Site map atta	
II. INTERVIEWS (Check all that apply)
1. O&M site manager John Chinnock. Stone & Web.	ster Project Manager 3/26/99
Name	Title Date
Interviewed 🗆 at site 🔹 at office 🖾 b	y phone Phone no. (303) 741-7024
Problems, suggestions; Report attached	
2. O&M staff Sid Lambiotte, Stone & Webster Re	
Name	Title Date
1	y phone Phone no. (303) 741-7709
Problems, suggestions; 🛛 Report attached	

•		t of p	ublic health or en	vironmental heal	d tribal offices, emerge th, zoning office, recor	
		,	Fill in all that app	•		
Contact						
	Nan			Title	Date	Phone no.
Problems;	; suggestions;			······································		
Agency		_				
	Nat	à₽		Title	Date	Phone no.
	suggestions;		Report attached	<u> </u>		
Agency				. <u></u>		
Contact						
	Nan			Title	Date	Phone no.
Problems;	suggestions;	П Р	lepoπ strached _	·		
Agency						
+ -		<u> </u>	_ .			
	Nan	30		Title	Date	Phone no.
Problems;	suggestions;	ΠF	cepoπ attached _			
					······································	
			Report attach	ed.		
Other inte	rviews (option	al) —	- Vebou anacu			
		al)				
Other inte		al)				
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		al) ~~~~~				
		al)			· · · · · · · · · · · · · · · · · · ·	

HL ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
1. O&M Manual and As-Builts
O&M Manual 🖬 Readily available 📓 Up to date □ N/A
As-builts 🖬 Readily available 🖻 Up to date 🗆 N/A
Maintenance Logs 🗵 Readily available 🖾 Up to date 🗆 N/A
Remarks Addendum 1 - CAMU Design documents CAMU operational procedures and construction
drawings. The maintenance logs are the souting inspections of the Corrective Action Management Unit
(CAMU). None of the above are currently applicable to the Site A SVE system as it has not yet been
<u>constructed</u>
2. Site Specific Health and Safety Plan 🖾 Readily available 🖾 Up to date 🗆 N/A
Contingency plan/emergency response plan 🗵 Readily available 🗵 Up to date 🗆 N/A
Remarks
3. O&M and OSHA Training Records 🗵 Readily available 🗵 Up to date 🗆 N/A
Remarks The above item applies to the CAMU. It is not currently applicable to the Site A SVE system as it
has not vet been constructed.
4. Permits and Service Agreements
□ Air discharge permit □ Readily available □ Up to date 🖾 N/A
□ Effluent discharge □ Readily available □ Up to date ☑ N/A
Waste disposal, POTW Readily available Up to date N/A (Note 2)
Other permits <u>(Note 3)</u> Readily available 22 Up to date N/A
Remarks
1) The Site A SVE system, when operational, will not need an air discharge permit based on estimated mas
removal rates.
2) Stormwater falling on the CAMU area is contained, tested, and then discharged to sanitary sever.
ultimately being treated at the Metropolitan Council Environmental Services (MCES) Treatment Plant
located at 2400 Childs Road in St. Paul. Minnesota. Discharge is authorized under an MCES Special
Discharge Approval
3) Excavated soils that have been treated (stabilized) in the CAMU have been sent to a permitted landfill for
disposal Laidlaw Environmental Services, (Rosemount, Minnesota) Inc.
5. Gas Generation Records
Remarks
6. Settlement Monument Records
Remarks
7. Groundwater Monitoring Records 🖾 Readily available 🖾 Up to date 🗀 N/A
Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual
Performance Report.
8. Leachate Extraction Records 🔲 Readily available 🖾 Up to date 🖾 N/A
Remarks:
9. Discharge Compliance Records
□ Air □ Readily available □ Up to date ■ N/A
🛛 Water (effluent) 🖾 Readily available 🖾 Up to date 🖾 N/A
Remarks The above applies to discharges of stormwater from the CAMU (under the MCES Special
Discharge Approval).

			IV. Q& I	M COSTS		
	rganization					
 State in-house PRP in-house 		Contractor for State				
		E Contracto				
					· · · · · · · · · · · · · · · · · · ·	
] Readi	ost Records ly available	Up to date	1		as not yet been constructed and osts was not deemed necessary)	
	-	timate			Breakdown attached	
		Total annual	cost by year fo	or review period if	available	
rem _		_ To			_ D Breakdown attached	
	Dates	~		Total cost		
rom _	Dates	To		Total cost	_ 🗇 Breakdown attached	
From		_ To			_ 🛛 Breakdown attached	
	Dates	-		Total cost		
rom _	Dates	To		Total cost	Breakdown attached	
rom	1/40.5	. To			🗇 Breakdown attached	
_	Dates			Total cost		
				ing Review Perio		
lescribe	costs and rea	sons: <u>N/A</u>				
				· · · · · · · · · · · · · · · · · · ·		
	.			<u>, </u>		
				<u> </u>	······································	

V. GENERAL SITE CONDITIONS Whenever possible, actual site conditions should be documented with photographs.
. Fencing
Fencing damaged D Location shown on site map E Gates secured D N/A Remarks <u>TCAAP is a secured facility with restricted access. Fences and locked gates are in good</u> and ition.
. Site Access
Access restrictions, signs, other security measures Location shown on map N/A Remarks (see above comments on fencing)
Perimeter Roads
Roads damaged Location shown on site map Ranacks N/A Remarks
. General
Vandalism/trespassing 🖾 Location shown on site map 🗷 No vandalism evident Remarks
Land use changes onsite II N/A Remarks
Land use changes offsite III N/A Remarks
Institutional controls (site conditions imply institutional controls not being enforced) IZ N/A Agency Contact
Name Title Date Phone no. Problems; suggestions; C Report attached
VI. LANDFILL COVER 🗆 Applicable 🖻 Not applicable
VII. VERTICAL BARRIER WALLS 🖾 Applicable 🖾 Not applicable
VIIL GROUNDWATER/SURFACE WATER REMEDIES Applicable Not applicable

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical pature and condition of any facility associated with the remedy. An example would be soil vapor extraction. (See additional remedy components below.)

A. Soil Remediation

What is the current status of soil remediation:

Site A <u>10.761 tons of soil have been excavated, transported to the TCAAP Corrective Action Management</u> Unit (CAMU), treated (stabilized), and transported to a permitted off-site disposal facility. Work was suspended for the winter but will resume in spring 1999.

Site A SVE System <u>The Engineering Evaluation/Cost Analysis (EE/CA) for a soil vapor extraction (SVE)</u> system to be installed at this site was approved by the MPCA and the USEPA. The system is intended to remediate VOC-contaminated source-area soils and is scheduled to be installed in the latter part of 1999.

Site C <u>A phytoremediation demonstration project is currently underway of this site and is scheduled to</u> continue through FY 1999.

Site E Excavation has not yet been initiated.

Site H Excavation has not yet been initiated.

Site 129-3 <u>A phytoremediation demonstration project is currently underway at this site and is scheduled to</u> continue through FY 1999.

Site 129-5 Excavation has not vet been initiated.

What is the anticipated schedule for completion of soil remediation:

 Site A
 1999

 Site A (SVE)
 2003

 Site C
 2001

 Site E
 2000

 Site H
 2000

 Site 129-3
 2001

 Site 129-5
 2000

What is the present condition of the TCAAP Corrective Action Management Unit (CAMU):

Pad/berm condition Run-on/run-off control Materials storage

- good condition
- n □ needs O&M
- good condition
 good condition
- □ needs O&M □ needs O&M

Describe any significant problems that have occurred during remediation activities, and whether they will require changes to the remedial design.

There have not been any significant problems that would require changes to the remedial design.

. (Groundwater Monitoring
	Describe the status of the five-year period of groundwater monitoring that is intended to verify no adverse
	emediation impacts at Sites A, C, E, H, 129-3, and 129-5. The five-vear period is not scheduled to begin until soil excavation activities are complete.
. (Characterization of Dumps
Ī	Describe the status of dump characterization:
	Site B: <u>Characterization work was conducted in early FY 1999 and a documentation report is currently</u> et regulatory review.
	Site 129-15: <u>Characterization work was conducted in early FY 1999 and a documentation report is</u> ently under regulatory review.
	f characterization is complete, describe the remedy that will be implemented and its status.
	Site 129-15:
-	X. OVERALL OBSERVATIONS
. 1	ffectiveness of the Remedy
E	Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, ninimize infiltration and gas emission, etc.).
1	For the shallow soil sites, exclusive of the dump sites, the remedy that has been selected is intended to remove soils that are contaminated above the cleanup goals specified in the OU2 ROD, restoring the site reailability for industrial use. The soil excavation, treatment, and off-site disposal remedy effectively accomplishes this objective. The remedy is in the early stages of implementation. Site A will have an
	additional removal action: an SVE system that will remove VOC-contamination from source area soils a hus speed the restoration of impacted groundwater. The SVE system is to be constructed in the latter pa
ť	of 1999.

	Adequacy and the Continued Need for O&M					
_	• •					
	Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy. O&M procedures are limited to the CAMU O&M procedures. Current procedures are deemed advante.					
The CAMU is serving its intended purpose of providing an environmentally-protective working area for the staging and treatment of excavated soils prior to their being transported off-site to the permitted disposal						
	facility.					
	Early Indicators of Potential Remedy Failure					
	Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future. None.					
).	Opportunities for Optimization					
	Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.					
-						

A.4 OU2 Deep Soil Sites (D and G)

1, SITE INF	ORMATION
Site namo: Operable Unit 2, Deep Soll Sites (D and G) New Brighton/Arden Hills Superfund Site	Date of inspection: March 16, 1999
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908
Agency, office or company leading the Five-Year Review: U.S. Army	Weather/temperature:
Remedy Includes (Check all that apply) Landfill cover/containment Groundwater pump and treatment Surface water collection and treatment Other <u>Soil vapor extraction</u>	
Inspection team roster attached	ched
II. INTERVIEWS (Check all that apply)
1. O&M site manager Jim Persoon, Alliant Techsvste Name	ns Program Director <u>March 16, 1999</u> Title Date
Interviewed 🖾 at site 🗆 at office 🗍 by Problems, suggestions; 🖬 Report attached	y phone Phone no. <u>(651) 633-2301. ext. 1631</u>
	roject Engineer March 16. 1999
Name Interviewed 🖾 at site 🛛 at office 🗔 b Problems, suggestions; 🗖 Report attached	Title Date y phone Phone no. <u>(651) 639-6913</u>

Agency <u>N/A</u> Contact					
	Name		Title	Date	Phone no.
Problems; sug	gestions; [Report attached			·····
Agency					
Contact			Title		
				Date	Phone no.
	_ . _ .				
Contact	Name		Title	Date	Phone no.
Problems; sug	ggestions; [Report attached			
Agency					
Contact	_		-		
	Name		Title	Date	Phone no.
	ggestions; D	I Report attached		··· · - · ·	
Problems; sug			- · · · -	•••• ••	
					· · ·
Other intervie	ews (optional)) 🗋 Report attach	ed.		
	ews (optional)	Report attach	ed.		
Other intervie	ews (optional)) 🗆 Report attach	ed.		· · · · · · · · · · · · · · · · · · ·
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Other intervie	ews (optional)) [] Report attack	ecí.		- ',
Other intervie	ews (optional)) [] Report attach	ed.		

III. ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
 O&M Manual and As-Builts O&M Manual I Readily available I Up to date I N/A As-builts I Readily available I Up to date I N/A Maintenance Logs I Readily available I Up to date I N/A Remarks
 2. Site Specific Health and Safety Plan
3. O&M and OSHA Training Records 🖾 Readily available 🖻 Up to date 🗍 N/A Remarks
4. Permits and Service Agreements □ Air discharge permit □ Readily available □ Up to date ☑ N/A □ Effluent discharge □ Readily available □ Up to date ☑ N/A □ Waste disposal, POTW □ Readily available □ Up to date ☑ N/A □ Other permits □ Readily available □ Up to date ☑ N/A
5. Cas Generation Records 🖾 Readily available 🖾 Up to date 🗆 N/A
Remarks <u>Air monitoring records and mass removal calculations</u> .
6. Settlement Monument Records
7. Groundwater Monitoring Records Z Readily available Z Up to date I N/A Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual Performance Report.
8. Leachate Extraction Records
9. Discharge Compliance Records □ Air □ Readily available □ Up to date □ N/A (See Number 4 above) □ Water (effluent) □ Readily available □ Up to date ☑ N/A Remarks

t Records available g mechanism	⊠ C ⊠ U	FV. O& entractor for State entractor for PRP p to date nent in place		
-house house t Records available g mechanism	⊠ C ⊠ U	p to date		
house t Records available g mechanism	⊠ C ⊠ U	p to date		
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t Records available g mechanism	⊠ U √agreen	p to date nent in place		
available g mechanism	/agreen	p to date nent in place		
g mechanism	/agreen	nent in place		
			c	
&M cost esti	inate			Decelsory attended
			<u> </u>	Breakdown attached
	Tota	l annual cost by year	for review period if	available
	То			Breakdown attached
Dates		_ _	Total cost	-
	To			Breakdown attached
Dates	_		Total cost	
	. To		Treel ever	Breakdown anached
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Dates	- 10	<u> </u>	Total cost	
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	Dates Dates Dates une 1997 Dates	Dates To Dates To Dates To Dates <i>ine 1997</i> To Dates	Dates To Dates To Dates To Dates To Dates To Dates Dates Dates Dates Dates Dates	Dates Total cost To Total cost Dates Sil,000

V. GENERAL SITE CONDITIONS
Whenever possible, actual site conditions should be documented with photographs. A. Fencing
1. Fencing damaged
B. Site Access
 Access restrictions, signs, other security measures Location shown on map N/A Remarks (see above comments on fencing)
C. Perimeter Roads
1. Roads damaged Location shown on site map Roads adequate N/A Remarks
D. General
1. Vandalism/trespassing
2. Land use changes onsite E N/A Remarks
3. Land use changes offsite 🗷 N/A Remarks
4. Institutional controls (site conditions imply institutional controls not being enforced) N/A AgencyContact
Name Title Date Phone no. Problems; suggestions; Report attached
VI. LANDFILL COVER 🖾 Applicable 🗔 Not applicable
A. Landfill Surface
1. Settlement (Low spots) Location shown on site map Senlement not evident Areal extent Remarks
2. Cracks □ Location shown on site map ☑ Cracking not evident Lengths Widths Remarks Depths
3. Erosion 📫 Location shown on site map 🖾 Erosion not evident Areal extent Depth Remarks

4.	Ioles I Location shown on site map I Holes not evident treal extent Depth temarks	
5.	/egetative Cover 🖻 Grass 🖾 Cover properly established 🖾 No signs of stress Trees/Shrubs (indicate size and locations on a diagram) temarks	
б.	Iternative Cover (armored rock, concrete, etc.) 🗷 N/A Itemarks	
7.	Sulges Image: Location shown on site map Image: Bulges not evident Areal extent Height Lemarks	-
8.	Wet Areas/Water Damage S Wet areas/water damage not evident Wet areas Location shown on site map Areal extent Ponding Location shown on site map Areal extent Seeps Location shown on site map Areal extent Soft subgrade Location shown on site map Areal extent Kemarks Location shown on site map Areal extent	_
9.	ilope Instability 📑 Stides 🗖 Location shown on site map 🗷 No evidence of slope instability Areal extent Remarks	-
B.	Benches	
C	Letdown Channels	

D. Cover Penetrations 🖻 Applicable 🗆 Not applicable
 Gas Vents ☐ Active ☐ Passive ☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled ☑ Good condition ☐ Needs O&M ☐ Evidence of leakage at penetration ☐ N/A Remarks <u>SVE Vents currently not operating while testing results are being reviewed to determine if</u> <u>continued operation is necessary.</u>
 2. Gas Monitoring Probes
 Monitoring Weils (within surface area of landfill) Properly secured/locked Functioning Routinely sampled Good condition Needs O&M Evidence of leakage at penetration N/A Remarks
4. Leachate Extraction Wells □ Properly secured/locked □ Functioning □ Routinely sampled □ Good condition □ Needs O&M □ Evidence of leakage at penetration ☑ N/A Remarks
5. Settlement Monuments 🖾 Located 🖾 Routinely surveyed 🖾 N/A Remarks
E. Gas Collection and Treatment (see SVE system discussion, Section IX)
 1. Gas Treatment Facilities □ Flaring □ Thermal destruction □ Collection for reuse □ Good condition □ Needs O&M Remarks
2. Gas Collection Wells, Manifolds and Piping ☐ Good condition ☐ Needs O&M Remarks

F.	Cover Dr	ainage Layer 🖾 Applicable 🖾 Not applicable
G.	Detention	I/Sectimentation Ponds 🗋 Applicable 📓 Not applicable
Н.	Retaining	g Walls 🗆 Applicable 🖾 Not applicable
Ľ	Perimete	r Ditches/Off-Site Discharge 🗆 Applicable 🗟 Not applicable
		VII. VERTICAL BARRIER WALLS
	VIIL	GROUNDWATER/SURFACE WATER REMEDIES
		IX. OTHER REMEDIES
	physical r	e remedies applied at the site which are not covered above, anach an inspection sheet describing the nature and condition of any facility associated with the remedy. An example would be soil vapor . (See additional remedy components below.) em
1.	SVE Ven	ts, Piping, Valves, and Other Appurtenances
	Site D	Good condition C Needs O&M
	Site G Remarks	Good condition Needs O&M
2.	SVE Blov	NETS
	Site D	🖾 Good condition 🛛 💭 Needs O&M
	Site G	🖾 Good condition 🛛 Needs O&M
	Remarks	
3.	Ön-Gas	Treatment System
	Site D	🗀 GAC 🔲 Thermal Oxidation 🖾 Not Required
	Site G	🖸 GAC 🔲 Thermal Oxidation 🛛 🖾 Not Required
	Remarks	

4.	Electrical Enclosures and Panels
	Site D 🛛 🖾 Good condition 🛛 Needs O&M
	Site G 🖪 Good condition 🗇 Needs O&M
	Remarks
_	
\$.	Treatment Building
	Site D 🔄 Good condition 🛛 Needs Repair 🖾 Chemicals and Equipment Properly Stored
	Site G 🗷 Good condition 🗋 Needs Repair 🖾 Chemicals and Equipment Properly Stored Remarks
б.	Operational Status
	System Airflow:
	Site D approx_6500 cim
	Site G approx. 7500 cfm
	Remarks
	Mode of Operation:
	Site D 🗖 Continuous 🔲 Pulse
	Site G 🔲 Continuous 🔲 Pulse
	Remarks
	Site D and G SVE systems were shut down on July 24, 1998, and August 6, 1998, respectively, in order to
	perform additional system investigation to show that the systems should remain off. A report
	recommending that the systems remain off is currently under review.
B.	Characterize Site D Shallow Soils and Site G Dump
	Describe the status of characterization:
	Fits The Company statistics of the liter solid second as incident to down solid investigation as durated in
	Site D: Some characterization of shallow soils occurred coincident to deep soil investigation conducted in
	FY 1997. Additional characterization is still needed for non-VOC contaminants.
	Site G: Some characterization of shallow solls occurred coincident to deep soll investigation conducted in
	EY 1997 and EY 1998. Additional characterization is still needed for non-VOC contaminants.
	<u>E 1 1997 Bau E 1 1990. Auuntaan Lauralieraunta is sin needen joi non-vot toatununun.</u>
	If characterization is complete, describe the remedy that will be implemented and its status.
	It characterization is complete, besonice the relatedy that will be propietizented and its status.
	Site D: D No further action D Other
	Status
	Site G: 🗇 No further action 🗇 Other
	Status

X. OVERALL OBSERVATIONS

A. Effectiveness of the Remedy

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

The shallow SVE systems at Sites D & G were installed to remove VOCs from soil in the unsaturated zone. The systems have been very effective, removing over 220,000 pounds of VOCs from startup in 1986 through FY 1998. A report recommending that the systems remain off is currently under review.

In FY 1998, a pilot study was conducted at site D to evaluate the potential effectiveness of installing a deepvent SVE system to remove VOCs from deeper soils that are potentially present in soils between the water table and the lower reach of the existing shallow SYE systems. A pilot study report is currently being prepared.

B. Adequacy and the Continued Need for O&M

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

N/A. The shallow SVE systems are anticipated to be left off.

Deep SVE systems are currently being evaluated.

C. Early Indicators of Potential Remedy Failure

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future. *None*.

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. None. (Shallow SVE systems are anticipated to be left off as described in Item A above.)

A.5 OU2 Site A Shallow Groundwater

I. SITE I	FORMATION
Site name: OU2, Site A Shallow Groundwater New Brighton/Arden Hills Superfund Site	Date of inspection: March 16, 1999
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908
Agency, office or company leading the Five-Year Review: U.S. Army	Weather/temperature:
Remedy includes (Check all that apply)	
□ Landfill cover/containment	
Groundwater pump and treatment	
Surface water collection and treatment	
Other	
🗷 Inspection team roster attached 🛛 Site map a	ttached
II. INTERVEN	S (Check all that apply)
1. O&M site manager Jim Persoon, Alliant Techsy	stems Program Director March 16, 1999
Name	Title Date
Interviewed 🗉 at site 🛛 at office 🖸	by phone Phone no. (651) 633-2301 ext. 1631
Problems, suggestions;	
2. O&M staff Jason Twaddle, CRA	Project Engineer March 16, 1999
Name	Title Date
Interviewed 🗷 at site 🛛 at office 🔾	by phone Phone no. <u>(651) 639-0913</u>
Problems, suggestions; 🖸 Report attached	

Contact	<u>N/A</u>				
	Name		Title	Date	Phone no.
Problems:	suggestions;	Report attached			- · · · · · · · · · · · · · · · · · · ·
Agency					
Contact					
Problems;				Date	Phone no.
Agency Contact					
Comace .	Name		Title	Date	Phone no.
Problems;	suggestions; 🛛	Report attached			
Agency					
Contact	Name		Title	Date	Phone no.
Problems;		Report attached			
Other inter	rviews (optional)	Report attach	ed.		
N.	%A				
					· - · · -
ı					

III. ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
1. O&M Manual and As-Builts
O&M Manual 🛛 🖾 Readily available 🖾 Up to date 🗇 N/A
As-builts 🛛 🔀 Readily available 🖾 Up to date 🗇 N/A
Maintenance Logs 🐵 Readily available 🖻 Up to date 🗍 N/A Remarks
 Site Specific Health and Safety Plan
3. O&M and OSHA Training Records Z Readily available Z Up to date D N/A Remarks
4. Permits and Service Agreements
□ Air discharge petmit □ Readily available □ Up to date ☑ N/A.
Effluent discharge Readily available Up to date N/A
🗷 Waste disposal, POTW 🛛 🖻 Readily available 🖉 Up to date 🖾 N/A
□ Other permits □ Readily available □ Up to date 🖾 N/A
Remarks <u>Recovered groundwater is pumped into the sanitary sewer and is ultimately treated at the</u>
Metropolitan Council Environmental Services (MCFS) Treatment Plant located at 2400 Childs Road in SL Paul, Minnesota. Discharge is authorized under Industrial Permit Number 2194 from the MCES.
5. Gas Generation Records
6. Settlement Monument Records
 Groundwater Monitoring Records
8. Leachate Extraction Records Readily available Up to date N/A Remarks
9. Discharge Compliance Records
☐ Air □ Readily available □ Up to date ☑ N/A
E Water (effluent) E Readily available E Up to date □ N/A
Remarks
·

🗆 Rea	Access/Security adily available ks <u>TCAAP is a</u>	៍ 🗖 ្	<pre>>p to date ■ N/A i facility with restric</pre>	ied access.	
	• • • • <u>-</u> • = • • • •		IV. 0	&M COSTS	
□ Stat □ PR □ Oth	Organization te in-house P in-house er Cost Records	20	Contractor for State		
	dily available	B (p to date		
1	ding mechanist	-	•		
Ungins	al Oacm cost est			·	Breakdown attached
		Tota	l annual cost by year	r for review period i	f available
From	Dates	To .	<u> </u>	Total cost	Breakdown attached
From		To .	<u> </u>		Breakdown attached
From	Dates	То		Total cost	D Breakdown attached
1 1011	Dates		-	Total cost	
From	Dates	_ T0 .	· · · · · · · · · · · · · · · ·	Total cost	🛛 Breakdown attached
From	_ <u>10/1/97</u> Dates	To	9/30/98	S110.000 Total cost	_ D Breakdown attached
			High O&M Costs D	uring Review Perio	od
<u>A high</u> teplace	<u>rate of pump fi</u> ment comprise	nilur <u>e</u> h d <u>the m</u> a	tt been observed at Notity of repair cost	this site, apparently a for the system. If	due to iron fouling. Pump some of the recovery wells can be shut
					·····
		-			
		·			

V. GENERAL SITE CONDITIONS
Whenever possible, actual site conditions should be documented with photographs.
A. Fencing
 Fencing damaged Location shown on site map Gates secured N/A Remarks <u>TCAAP is a secured facility with restricted access. Fences and locked gates are in good condition. </u>
B. Site Access
1. Access restrictions, signs, other security measures Remarks <i>(see above comments on fencing)</i>
C. Perimeter Roads
1. Roads damaged Location shown on site map Roads adequate N/A Remarks
D. General
1. Vandalism/trespassing
2. Land use changes onsite E N/A Remarks
3. Land use changes offsite 🖾 N/A Remarks
 Institutional controls (site conditions imply institutional controls not being enforced) □ N/A Agency Institutional controls are in place for the plume area that is off-site (see Section IX). Contact
Name Tifle Date Phone no. Problems; suggestions; □ Report attached
VI. LANDFILL COVER
VIL VERTICAL BARRIER WALLS
VIIL GROUNDWATER/SURFACE WATER REMEDIES @ Applicable D Not applicable
A. Groundwater Extraction Wells, Pumps, and Pipelines
1. Pumps, Wellhead Plumbing, and Electrical If Good condition It all required wells located If Remarks
2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances E Good condition Needs O&M Remarks

B. Surface Water Collection Structures, Pumps, and Pipelines	
Applicable E Not applicable	
1. Collection Structures, Pumps, and Electrical	
□ Good condition □ Needs O&M	
Remarks	
2. Surface Water Collection System Pipelines, Vaives, Valve Boxes, and Other Appurtenances	
Good condition Deceds O&M	
Remarks	
C. Treatment System III Applicable 🖸 Not applicable	
1. Treatment Train (Check components that apply)	
□ Metais removal □ Oil/water separation □ Bioremediation	
🗖 Air stripping 🗖 Carbon adsorbers	
Filters E Others Direct discharge to sunitary sewer.	
Good condition Needs O&M	-
Sampling ports properly marked and functional	
Sampling/maintenance log displayed and up to date (not kept on-site)	
D Equipment properly identified	
Quantity of groundwater treated annually <u>Approx. 16 million gallons</u>	
Quantity of surface water treated annually <u>N/A</u>	
Remarks	
2. Electrical Enclosures and Panels (properly rated and functional)	
Second condition CI Needs O&M	
Remarks	
3. Tanks, Vaults, Storage Vessels 🛛 🖾 N/A	
□ Good condition □ Proper secondary containment □ Needs O&M	
Remarks	
4. Discharge Structure and Apportenances 🔲 N/A	
🗳 Good condition 🗆 Needs O&M	
Remarks	
5. Treatment Building(s) 🗆 N/A	
☑ Good condition □ Needs repair	
Chemicals and equipment properly stored	
Remarks	

 Monitoring Wells (pump and treatment remedy) Properly secured/locked
S Functioning E Routinely sampled E Good condition E All required wells located
□ Needs O&M □ N/A
Remarks
D. Monitored Natural Attenuation
1. Monitoring Wells (natural attenuation remedy) Properly secured/locked
□ Functioning □ Routinely sampled
□ Good condition □ All required wells located □ Needs O&M N/A
Remarks
EX. OTHER REMEDIES
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the
physical nature and condition of any facility associated with the remedy. An example would be soil vapor
extraction. (See additional remedy components below.)
A. Alternative Water Supply/Well Abandonment
The OUI Alternative Water Supply and Well Abandonment Program was expanded to cover the area
affected by the OU2 Site A shallow groundwater plume, both on-site and off-site. (See OU1 Site Inspection
for discussion of this remedy component.) The off-site plume area is included within the Special Well
Construction Area.
B. Source Characterization
Describe the status of source characterization:
A source characteritation investigation report was completed in FY 1998. Based upon review of results.
some follow-up characterization work is currently planned.
If characterization is complete, describe the remedy that will be implemented and its status:
□ No further action
Status
Excavation of metals-contaminated soils was initiated in FY 1998 but was suspended for the winter. Soils
are being treated (stabilized) in the TCAAP Corrective Action Management Unit (CAMU) prior to
transportation off-site to a permitted disposal facility. Soil excavation, treatment, and disposal will resume
In spring 1999. Excavation of the A-5 dump is also planned. An SVE system is scheduled to be constructed
in the latter part of 1999 to remediate VOC-contaminated solls.

	X. OVERALL OBSERVATIONS
	Effectiveness of the Remedy
•••	Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).
	The recovery well system contains the VOC plume and is restoring the aquifer to the cleanup goals established in the OU2 ROD. The system is pumping at a rate which exceeds the design system flowrate of 25 gpm. VOC concentrations in the plume generally show stable or decreasing trends. The four downgradient recovery wells show no VOCs above cleanup goals. Water discharged to the sanitary sewer has met the discharge requirements.
	Adequacy and the Continued Need for O&M
	Describe issues and observations related to the implementation and scope of O&M procedures. In particular discuss their relationship to the current and long-term protectiveness of the remedy.
	The O&M procedures are effective for providing short- and long-term protectiveness. The procedures have resulted in system operation that is providing adequate containment of the plume and restoration of the groundwater. The source removal work, particularly the planned SVE system, will shorten the time
	required to reach groundwater cleanup godis.
	Early Indicators of Potential Remedy Failure
	Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequer of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future <i>None</i>

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. Clean recovery wells should be shut off. Source removal should proceed as currently planned.

N:\0003\60\02\OU2SITA.DOC-rlb

A.6 OU2 Site I Shallow Groundwater

I. SITE IN	FORMATION
Site name: OU2, Site I Shallow Groundwater New Brighton/Arden Hills Superfund Site	Date of inspection: March 16, 1999
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908
Agency, office or company leading the Five-Year Review: U. S. Army	Weather/temperature:
Remedy Includes (Check all that apply)	
Landfill cover/containment	
Groundwater pump and treatment	
Surface water collection and treatme	nt
and treat system	t testing, design and installation of a groundwater pump
Inspection team roster attached Site map at	ttached
II. INTERVIEWS	5 (Check all that apply)
1. O&M site manager Dave Gosen. Alliant Techsys	
Name	Title Date
	by phone Phone no. <u>(612) 931-6973</u>
Problems, suggestions; 🖸 Report attached	· · · · · · · · · · · · · · · · · · ·
2. O&M staff	
Name	Title Date
Interviewed 🖸 at site 🗖 at office 📮	by phone Phone no.
Problems, suggestions; 🗇 Report attached	

Contact	N/A			
	Name	Title	Date	Phone no.
Problems; su	ggestions; 🛛 Report attached	i		
Agency				
Contact				
	Name	Title	Date	Phone no.
Problems; su	ggestions; 🛛 Report attached	·		
Agency				
Contact		Title		<u> </u>
n	Name		Date	Phone no.
	ggestions; 🛛 Report attached	····		
Agency				
Contact	Name			
			Date	Phone no.
Propiems; su	ggestions; 🗆 Report attached	······		
Other intervi	ews (optional) 🛛 🗔 Report atta	iched.		
N	И			_ _ · , _ ,
	·			

III. ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
1. O&M Manuat and As-Builts
O&M Manual 🔲 Readily available 🗖 Up to date 📓 N/A
As-builts 🛛 Readily available 🗂 Up to date 🗵 N/A
Maintenance Logs
Remarks The system is not designed or constructed.
2. Site Specific Health and Safety Plan 🗇 Readily available 🗇 Up to date 🖾 N/A
🗇 Contingency plan/emergency response plan 🖓 Readily available 🖓 Up to date 🖾 N/A
Remarks The system is not designed or constructed.
3. O&M and OSHA Training Records 🔲 Readily available 🗍 Up to date 🗷 N/A
Remarks The system is not designed or constructed.
4. Permits and Service Agreements
🖾 Air discharge permit 🗌 Readily available 🗔 Up to date 🖾 N/A
□ Effluent discharge □ Readily available □ Up to date ☑ N/A.
□ Waste disposal, POTW □ Readily available □ Up to date ☑ N/A
🖸 Other permits 🖸 Readily available 🗔 Up to date 🖾 N/A
Remarks The system is not designed or constructed.
5. Gas Generation Records 🛛 Readily available 🗔 Up to date 🗵 N/A
Remarks
6. Settlement Monument Records 🛛 Readily available 🗔 Up to date 🐵 N/A
Remarks
7. Groundwater Monitoring Records 🛛 B Readily available 🗷 Up to date 🗆 N/A
Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual
Performance Report.
8. Leachate Extraction Records 🛛 Readily available 🗌 Up to date 🖾 N/A
Remarks
9. Discharge Compliance Records
🗆 Air 🗆 Readily available 🗆 Up to date 🗵 N/A
🗆 Water (effluent) 🖽 Readily available 🗆 Up to date 🖾 N/A
Remarks The system is not designed or constructed.

State in-house □ Contractor for State PRP in-house □ Contractor for PRP Other <u>MA. The system is not designed or constructed.</u> &M Cost Records □ Readily available □ Up to date ⊡ N/A (System not constructed yet) Funding mechanism/agreement in place □ Breakdown attached riginal O&M cost estimate □ □ Total annual cost by year for review period if available □ form To □ Dates Total cost rom To □ Dates Total cost □ rom To □ □ Dates Total cost □ □ rom To □ □ rom To □ □ □	<u></u>		IV. O&M COSTS	
PRP in-house Contractor for PRP Other NA. The system is not designed or constructed. &M Cost Records Readily available Up to date Promoting mechanism/agreement in place riginal O&M cost estimate Image: Designed or review period if available Total annual cost by year for review period if available rom To Dates Total cost Image: To Image: Designed cost Image: To	O&M Organization			
Other N/A. The system is not designed or constructed. &M Cost Records Up to date @ N/A (System not constructed yet) Funding mechanism/agreement in place Image: Breakdown attached riginal O&M cost estimate Image: Breakdown attached Total annual cost by year for review period if available rom To Image: Dates Image: To Image: To Image: Total cost	State in-house			
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District Contraction of the Cont	Dates		Total cost	
nanticipated or Unusually High O&M Costs During Review Period				

V. GENERAL SITE CONDITIONS Whenever possible, actual site conditions should be documented with photographs.
A. Fencing
 Fencing damaged Location shown on site map
B. Site Access
1. Access restrictions, signs, other security measures Remarks (see above comments on fencing)
C. Perimeter Roads
1. Roads damaged Location shown on site map Roads adequate N/A Remarks
D. General
1. Vandalism/trespassing Location shown on site map No vandalism evident Remarks
2. Land use changes onsite IN/A Remarks
3. Land use changes offsite 🗵 N/A Remarks
 Institutional controls (site conditions imply institutional controls not being enforced) Agency Contact
Name Title Date Phone no.
Problems; suggestions; 🛛 Report attached
VL LANDFILL COVER 🖸 Applicable 🚇 Not applicable
VIL VERTICAL BARRIER WALLS 🗇 Applicable 🗷 Not applicable
VIII. GROUNDWATER/SURFACE WATER REMEDIES 🗆 Applicable 🛛 Sof applicable
(The system is not designed or constructed.)
A. Groundwater Extraction Wells, Pumps, and Pipelines
Applicable In Applicable In Pumps, Wellhead Plumbing, and Electrical Good condition All required wells located Needs O&M N/A Remarks

2.	struction System Pipelines, Valves, Valve Boxes, and Other Appurtenances
1	Good condition 🛛 Needs O&M
	emarks
B .	urface Water Collection Structures, Pumps, and Pipelines
	Applicable Z Not applicable
h	oliection Structures, Pumps, and Electrical
1	Good condition
	emarks
	urface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances
· - 1	Good condition \Box Needs O&M
	emarks
_	reatment System
ГC.	reatment System D Applicable D Not applicable The system is not besigned of constructed.
Ī.	reatment Train (Check components that apply)
	Metals removal 🛛 Oil/water separation 🗖 Bioremediation
	Air stripping 🛛 Carbon adsorbers
	Filters Others
	Good condition
ŀ	Sampling ports properly marked and functional
ļ	Sampling/maintenance log displayed and up to date
Ė	Equipment properly identified
1	Quantity of groundwater treated annually
1	Quantity of surface water treated annually
	emarks
]	
:	
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1	
2.	lectrical Enclosures and Panels (properly rated and functional) D N/A
	Good condition 🔲 Needs O&M
	emarks
1	
<u> </u>	anks, Vaults, Storage Vessels 🔲 N/A
3.	
	emarks
4.	Discharge Structure and Appurtenances 🛛 N/A
	3 Good condition 📫 Needs O&M
	temarks

5.	Treatment Building(s) 🗇 N/A					
	C Good condition D Needs repair					
	Chemicals and equipment properly stored					
	Remarks					
б.	Monitoring Wells (pump and treatment remedy)					
	B Functioning B Routinely sampled B Good condition B All required wells located					
	🗆 Needs O&M 🔲 N/A					
	Remarks					
D.	Monitored Natural Attenuation					
	Monitoring Wells (natural attenuation remedy) G Properly secured/locked					
1.	C Functioning C Routinely sampled					
	☐ Good-condition □ All required wells located □ Needs O&M ≧ N/A					
	Remarks					
	IX. OTHER REMEDIES					
	If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the					
	physical nature and condition of any facility associated with the remedy. An example would be soil vapor					
	extraction. (See additional remedy components below.)					
A.	Additional Investigation					
_	Describe the status of additional investigation					
	a titut. I timunaling dan manda in an indiana					
	Adactional Investigation work is complete.					
	If the additional investigation is complete, discuss whether the results have changed the remedy.					
	Results led to proposing a dual-phase extraction remedy (combining groundwater extraction and soil vapor					
	extraction). The proposed remedy has been approved and is scheduled to begin pilot testing in FV 1999. A					
	pilot study for dual-phase extraction will be conducted prior to system construction.					

	X. OVERALL OBSERVATIONS					
Α.	Effectiveness of the Remedy					
	Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.). The system is not designed or constructed. System is intended to contain the plume, remove VOCs from source area soils, and restore groundwater to the cleanup goals established in the OU2 ROD.					
	Adequacy and the Conunued Need for O&M					
	Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy. The system is not designed or constructed.					
<u> </u>	Early Indicators of Potential Remedy Failure					
. .	Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future. The system is not designed or constructed.					

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. The system is not designed or constructed.

A.7 OU2 Site K Shallow Groundwater

]	. SITE INFORMATION
Site name: OU2, Site K Shallow Groundwa New Brighton/Arden Hills Superfund Site	tter Date of inspection: March 16, 1999
Location and region: Arden Huls, MN, Reg	zion 5 EPA ID: MIN 7213820908
Agency, office or company leading the Five Review: U.S. Army	-Year Weather/temperature:
Remedy Includes (Check all that apply)	
Landfill cover/containment	
Groundwater pump and treatment	
Surface water collection and treatme	nt
🗖 Other	
Inspection team roster attached	Site map attached ERVIEWS (Check all that apply)
-	liant Techsystems Environmental Engineer N/A
Name	Title Date
	e 🗖 by phone Phone no. <u>(651) 639-3031</u>
Protiens, suggestions, 🗀 Report anac	ched
2. O&M staff Charles Cooke, CRA	Project Manager March 16, 1999
Name	Title Date
Interviewed 🗵 at site 🛛 🗘 at offic	e 🖸 by phone Phone no. <u>(651) 639-0913</u>
Problems, suggestions; 🖾 Report attac	ched

Contact					
	Name		Title	Date	Phone no.
Problems; sug	gestions; [Report attached			
Agency					
Contact					
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Agency					
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Igency					·· —
Contact					
	Name		Title	Date	Phone no.
roblems: sug	gestions; C	J Report attached			--
Other interview	ws (optional)	C Report attache	ed.		
N/A		·			<u> </u>
					, <u> </u>

	III. ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)
	O&M Manual and As-Builts O&M Manual Image: Contract of the second sec
	Site Specific Health and Safety Plan 🖾 Readily available 🖾 Up to date 🗔 N/A Contingency plan/emergency response plan 🗆 Readily available 🗖 Up to date 🖾 N/A Remarks
	O&M and OSHA Training Records 🖾 Readily available 🖾 Up to date 🗆 N/A Remarks
5.	Permits and Service Agreements Air discharge permit Readily available Up to date N/A (Note 1) Effluent discharge Readily available Up to date N/A Waste disposal, POTW Readily available Up to date N/A Other permits
6.	Settlement Monument Records
7.	Groundwater Monitoring Records Readily available Up to date N/A Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual Performance Report.
8.	Leachate Extraction Records Readily available Up to date N/A Remarks
9.	Discharge Compliance Records Air Readily available Up to date N/A Water (effluent) Readily available Up to date N/A Remarks

IV. O&M COSTS									
1 0.8M	1. O&M Organization								
	e in-house	Contractor f	for State						
	' in-house	Contractor f							
2. O&M	Cost Records	<u></u>	······································						
🗆 Rea	dily available	🗵 Up to date (4	costs are proprietary.)						
🗵 Fun	ding mechanism	n/agreement in plac	ce						
Origina	i O&M cost est	imate		🗆 Breakdown attached					
		Total annual co	ost by year for review period	l if available					
From		То		🛄 Breakdown attached					
	Dates		Total cost						
From	- <u></u>	_ To		Breakdown attached					
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From	Dates	To		Breakdown attached					
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110/11	Dates		Total cost						
Dates Total cost 3. Unanticipated or Unusually High O&M Costs During Review Period Describe costs and reasons: A new treatment system will be installed in FY 1999 to replace the existing system in order to lower the O&M costs. The existing air stripper is a packed-tower type that requires media replacement every 4 to 6 weeks due to iron fouling problems. The new air stripper is a fluidized bed type and is expected to minimize the fouling problems, thus reducing the O&M costs.									

	V. GENERAL SITE CONDITIONS
	Whenever possible, actual site conditions should be documented with photographs.
A.	Fencing
1.	Fencing damaged Location shown on site map Remarks <u>TCAAP</u> is a secured facility with restricted access. Fences and locked gates are in good condition.
B.	Site Access
1.	Access restrictions, signs, other security measures
C.	Perimeter Roads
١.	Roads damaged 🖬 Location shown on site map 🖾 Roads adequate 🗆 N/A Remarks
D.	General
1.	Vandalism/trespassing
2.	Land use changes onsite N/A Remarks
3.	Land use changes offsite IN/A Remarks
4.	Institutional controls (site conditions imply institutional controls not being enforced) IS N/A Agency Contact
	Name Title Date Phone no. Problems; suggestions; I Report attached
	VI. LANDFILL COVER 🖾 Applicable 🖾 Not applicable
	VIL VERTICAL BARRIER WALLS
	VIII. GROUNDWATER/SURFACE WATER REMEDIES 🖾 Applicable 🛛 Not applicable
	Groundwater Extraction Wells, Pumps, and Pipelines
1.	Pumps, Wellhead Plumbing, and Electrical
	E Good condition All required wells located I Needs O&M N/A Remarks Some items will be replaced when the new treatment system is installed.
2.	Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances
	☑ Good condition □ Needs O&M Remarks Some items will be replaced when the new treatment system is installed

B. Surface Water Collection Structures, Pumps, and Pipelines
Applicable 🛛 🖾 Not applicable
1. Collection Structures, Pumps, and Electrical
□ Good condition □ Needs O&M
Remarks
2. Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances
□ Good condition □ Needs O&M
Remarks
C. Treatment System 🖪 Applicable 🗆 Not applicable
1. Treatment Train (Check components that apply)
Metals removal Oil/water separation G Bioremediation
☑ Air stripping □ Carbon adsorbers
Filters Others
Good condition INeeds O&M
Sampling ports properly marked and functional
Sampling/maintenance log displayed and up to date (not displayed on-site)
Equipment properly identified
Quantity of groundwater treated annually <u>Approx. 4 million gallons</u>
Quantity of surface water treated annually <u>N/A</u>
Remarks
· · · · · · · · · · · · · · · · · · ·
2. Electrical Enclosures and Panels (properly rated and functional)
Good condition Needs O&M
Remarks
a manta Manta Otana IV
3. Tanks, Vaults, Storage Vessels 🖾 N/A
Good condition Proper secondary containment Decade O&M
Remarks
4. Discharge Structure and Appurtenances 🔲 N/A
☐ Good condition □ Needs O&M
Remarks
5. Treatment Building(s)
S Good condition S Needs repair
Chemicals and equipment properly stored (N/A)
Remarks

6. Monitoring Wells (pump and treatment remody) B Properly secured/locked
E Functioning E Routinely sampled E Good condition E All required wells located
D Needs O&M D N/A
Remarks
D. Monitored Natural Attenuation
I. Monitoring Wells (natural attenuation remedy)
Functioning Routinely sampled
🗖 Good condition 🛛 All required wells located 🗂 Needs O&M 🗷 N/A
Remarks
IX. OTHER REMEDIES
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing
physical nature and condition of any facility associated with the remedy. An example would be soil vapor
extraction. (See additional temedy components below.)
A. Additional Investigation
Describe the status of additional investigation
A work plan for additional investigation of the source area for VOC contamination has been approved.
Additional investigation for non-VOC contaminants will be conducted after removal of the building.
If the additional investigation is complete, discuss whether the results have changed the remedy.
X. OVERALL OBSERVATIONS
A. Effectiveness of the Remedy
Describe issues and observations relating to whether the remedy is effective and functioning as designed.
Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume,
minimize infiltration and gas emission, etc.).
The remedy is intended to provide containment of the groundwater plume and to restore the groundwate
the cleanup levels specified in the OU2 ROD. The currently planned additional investigation is intender
further define the VOC source area and determine if any additional remedies are necessary. The
groundwater recovery and treatment system is effective since it is containing the plume and since treater
water is in compliance with the discharge requirements.

<u>R.</u>	Adeouacy	and the	Continued	Need	for O&M
	A A CHARGE				

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

O&M procedures are deemed adequate to ensure short- and long-term protectiveness of the remedy. Containment is being achieved and discharge requirements are consistently met.

C. Early Indicators of Potential Remedy Failure

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remody may be compromised in the future.

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy, None.

A.8 OU2 Deep Groundwater

Five-Year Review Site Inspection Checklist

(Working document for site inspection. Information may be filled in by hand and attached to the five-year review report as supporting documentation of site status.)

I. SITE I	INFORMATION
Site name: OU2 Deep Groundwater New Brighton/Arden Hills Superfund Site	Date of inspection: March 16, 1999
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908
Agency, office or company leading the Five-Year Review: U.S. Army	Weather/temperature:
Remedy Includes (Check all that apply)	
Landfill cover/containment	
B Groundwater pump and treatment	
Surface water collection and treatment	
Other	
Inspection team roster attached D Site map a	attached
T. INTERVIEW	VS (Check all that apply)
	······································
1. O&M site manager Jim Persoon. Alliant Techs	wstems Program Director March 16. 1999
Name	Title Date
Interviewed 🖼 at site 🛛 at office 🗂	by phone Phone no. <u>(612) 931-6973</u>
Problems, suggestions; 🛛 Report attached	
	Project Manager March 16, 1999
Name	Title Date
Interviewed 🖾 at site 🗆 at office 🗖] by phone Phone no. <u>(651) 639-0913</u>
Problems, suggestions; 🛛 Report attached	· · · · · · · · · · · · · · · · · · ·

Contact					Phone no.
Problems; su					
Contact	Nam Nam	t C Report attached	Title	Date	Phone no.
Agency Contact					
Problems; su	Nam aggestions:	-	Title	Date	Phone no.
Contact	Nam		Title	Dare	Phone no.
Problems: su		Report attached			·
Other interv	ews (optiona	al) 🖸 Report attach	ed.		
NI)			•		

	ITE DOCUMENTS & RECORDS V	ERIFIED (Check an inge apply)
O&M Manual and A		
		te 🖸 N/A
	• •	te 🗆 N/A
	• •	te 🗆 N/A.
Remarks		
Site Specific Health	and Safety Plan 🛛 🗷 Readily availab	ie 🗷 Up to date 🗆 N/A
		y available 🛛 Up to date 🗷 N/A
Remarks		
O&M and OSHA T	aining Records 🛛 🗷 Readily avail	able 🖾 Up to date 🗆 N/A
	4	
Permits and Service	ajt 🛛 Readily available 🗔	Un to date 🖾 N/A
All utscharge pen Fffluent discharm	Readily available	Up to date 🖾 N/A
		Up to date S N/A
□ other nermits		y available 🖸 Up to date 🗷 N/A
Remarks		,
Gas Generation Re		ip to date 🖾 N/A
Gas Generation Re Remarks	ords	p to date 🖾 N/A
Gas Generation Re Remarks Settlement Monum Remarks Groundwater Mon	ords	ip to date IN/A
Gas Generation Re Remarks Settlement Monum Remarks Groundwater Mon	ords	ip to date IN/A
Gas Generation Re- Remarks Settlement Monum Remarks Groundwater Mon Remarks <u>Groundw</u>	ords	p to date IN/A Up to date IN/A ble Up to date IN/A d in the TCAAP Fiscal Year 1998 Annual
Gas Generation Re- Remarks	ords	ip to date IN/A Up to date IN/A ble Up to date IN/A d in the TCAAP Fiscal Year 1998 Annual Up to date IN/A
Gas Generation Re Remarks Settlement Monum Remarks Groundwater Mon Remarks <u>Groundw</u> erformance Report. Leachate Extractio Remarks	ords	ip to date IN/A Up to date IN/A ble Up to date IN/A d in the TCAAP Fiscal Year 1998 Annual Up to date IN/A
Gas Generation Re Remarks Settlement Monum Remarks Groundwater Moni Remarks <u>Groundw</u> erformance Report. Leachate Extractio Remarks Discharge Complia	ords	p to date IN/A Up to date IN/A ble Up to date IN/A in the TCAAP Fiscal Year 1998 Annual Up to date IN/A
Gas Generation Re Remarks Settlement Monuta Remarks Groundwater Mon Remarks <u>Groundw</u> erformance Report. Leachate Extractio Remarks Discharge Complia Q Air	ords	p to date IN/A Up to date IN/A ble Up to date IN/A d in the TCAAP Fiscal Year 1998 Annual Up to date IN/A (See Number 4 above)
Gas Generation Re- Remarks	ords Readily available ords Readily available toring Records Readily available ner monitoring results are documente n Records Records Readily available Rea	ip to date IN/A Up to date IN/A ble Up to date IN/A <i>d in the TCAAP Fiscal Year 1998 Annual</i> Up to date IN/A <i>(See Number 4 above)</i> ate IN/A
Gas Generation Re- Remarks Settlement Monum Remarks Groundwater Moni Remarks <u>Groundw</u> erformance Report. Leachate Extractio Remarks Discharge Complia [] Air [] Readif E Water (effluent)	ords	ip to date IN/A Up to date IN/A ble Up to date IN/A <i>d in the TCAAP Fiscal Year 1998 Annual</i> Up to date IN/A <i>(See Number 4 above)</i> ate IN/A

			11	. O&M COSTS	
O&M	Organization				
	te in-house		Contractor for Sta	ate	
🗅 PRI	P in-house		Contractor for PF	up l	
	utar				
0&M	Cost Records				
	adily available		Jp to date		
	ading mechanist		•		
Örigin	al O&M cost es	timate	\$732.700 (OU2	<u>ROD. 1997 dallars)</u> 🛛 🗆	Breakdown attached
				year for review period if	
From		_ To	· · •		Breakdown attached
	Dates	т.		Total cost	🗋 Breakdown attached
From	Dates	_ 10		Total cost	_ Dreakdown adached
From	Dates	То		1040 003.	Breakdown attached
	Dates			Totai cost	
	6/84-2				_
From	Land	_ To		_	Breakdown attached
From	Dates	_ To	<u> </u>	Total cost	Breakdown attached
From From			<u>-9/31/98</u>	Total cost <u> \$700.000</u> Total cost	 Breakdown attached Breakdown attached

-

V. GENERAL SITE CONDITIONS
Whenever possible, actual site conditions should be documented with photographs.
A. Fencing
 Fencing damaged Location shown on site map
B. Site Access
1. Access restrictions, signs, other security measures
C. Perimeter Roads
1. Roads damaged Location shown on site map Roads adequate N/A Remarks
D. General
1. Vandalism/trespassing Location shown on site map No vandalism evident Remarks
2. Land use changes onsite II N/A Remarks
3. Land use changes offsite N/A Remarks
 Institutional controls (site conditions imply institutional controls not being enforced) N/A (see Section IX). Agency Contact
Name Title Date Phone no. Problems; suggestions: П Report attached
VL LANDFILL COVER
VII. VERTICAL BARRIER WALLS 🗆 Applicable 🗐 Not applicable
VIII. GROUNDWATER/SURFACE WATER REMEDIES 🗷 Applicable 🛛 Not applicable
A. Groundwater Extraction Wells, Pumps, and Pipelines
1. Pumps, Wellbead Plumbing, and Electrical
Good condition
2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances
Z. Entraction System Pipennes, Valves, Valve Boxes, and Other Appurtenances El Good condition

B. Surface Water Collection Structures, Pumps, and Pipelines	
Applicable 🗷 Not applicable	
1. Collection Structures, Pumps, and Electrical	
🗆 Good condition 🖾 Needs O&M	
Remarks	
2. Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances	
Good condition 🖸 Needs O&M	
Remarks	
C. Treatment System 🗷 Applicable 🗆 Not applicable	
1. Treatment Train (Check components that apply)	
Metals removal Oil/water separation Define Bioremediation	
🗵 Air stripping 🔲 Carbon adsorbers	
Filters Others	
🖾 Good condition 🛛 🗆 Needs O&M	
Sampling ports properly marked and functional	
Sampling/maintenance log displayed and up to date	
Equipment properly identified	
Quantity of groundwater treated annually <u>Approx. 1.2 Billion gallons</u>	
Quantity of surface water treated annually <u>N/A</u>	
Remarks	
	<u> </u>
· · · · · · · · · · · · · · · · · · ·	
2. Electrical Enclosures and Panels (properly rated and functional)	·
Good condition C Needs O&M	
Remarks	
3. Tanks, Vaults, Storage Vessels 🔲 N/A	
☑ Good condition □ Proper secondary containment □ Needs O&M	
Remarks Maintenance painting is currently planned for the exterior of the air stripping towers.	
4. Discharge Structure and Appurtenances 🛛 N/A	
☑ Good condition □ Needs O&M	
Remarks	
5. Treatment Building(s)	
Good condition D Needs repair	
E Chemicals and equipmont properly stored	
Remarks	

6.	Monitoring Wells (pump and treatment temedy) 🗵 Properly secured/locked
	E Functioning E Routinely sampled E Good condition E All required wells located
	□ Needs O&M □ N/A
	Remarks
D .	Monitored Natural Attenuation
ι.	Monitoring Wells (natural attenuation remedy)
	Functioning Routinely sampled
	📮 Good condition 🛛 All required wells located 🖓 Needs O&M 🖾 N/A
	Remarks
┡	IX. OTHER REMEDIES
	If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the
	physical nature and condition of any facility associated with the remedy. An example would be soil vapor
	extraction. (See additional remedy components below.)
A .	Institutional Controls
	The Special Well Construction Area does not include the TCAAP facility; however, the OUI Alternative
{	Water Supply and Well Abandonment Program does include the TCAAP facility. (See OU1 Site Inspection
	for discussion of this remedy component.)
	jot the most of this remain componently
B.	Review of New Technologies
⊢	Are reviews conducted Z Yes C No
	Remarks Natural attenuation is being reviewed. Also, APR includes review of new technologies, as
	applicable
 -	X. OVERALL OBSERVATIONS
A	Effectiveness of the Remedy
⊢	Describe issues and observations relating to whether the remedy is effective and functioning as designed.
	Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume,
ĺ	minimize infiltration and gas emission, etc.).
	The TCAAP Groundwater Recovery System (TGRS) provides containment of the VOC plume (above the
<u>ا</u>	cleanup goals) and provides contaminant removal from the highest groundwater contamination areas
	(source areas). The system is shrinking the size of the plume. The system has been effective at mass
	removal. Since system start-up in 1987, the TGRS has removed 167,289 pounds of VOCs. In FY 1998, the
i i	TGRS removed 6.132 pounds of VOCs. The annual mass removal has generally been declining since FY
	1992, but continues to temove a relatively large mass of VOCs each year. The treatment componentials
1	stripping) is effective because discharge requirements are consistently met.

B. Adequacy and the Continued Need for O&M

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

O&M procedures are providing short- and long-term protectiveness of the remedy. The system has run without significant problems and in a manner that provides the desired containment and level of treatment prior to discharge.

C. Early Indicators of Potential Remedy Failure

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future. *None.*

D. Opportunities for Optimization

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. The system could potentially be modified in two ways. First, extraction wells located on the "shrinking edge" of the plume could potentially be shut off as it is now pumping water that is below the cleanup goals specified in the OU2 ROD. Second, the pumping scheme could potentially be altered to better maximize mass removal (while still maintaining containment). System optimization is being studied now with a report expected in FY 1999.

A.9 OU3

Five-Year Review Site Inspection Checklist

(Working document for site inspection. Information may be filled in by hand and attached to the five-year review report as supporting documentation of site status.)

I. SITE I	NFORMATION								
Site name: Operable Unit 3 New Brighton/Arden Hüls Superfund Site	Date of inspection: March 16, 1999								
Location and region: Arden Hills, MN, Region 5	USEPA ID: MN 7213820908								
Agency, office or company leading the Five-Year Weather/temperature: Review: U. S. Army									
Remedy Includes (Check all that apply)									
Landfill cover/containment									
Groundwater pump and treatment									
Surface water collection and treatment									
• Other									
Inspection team roster attached Isite map attached II. INTERVIEWS (Check all that apply)									
1. O&M site manager Dave Olson, City of N.B	Public Works SuperintendentN/A								
Name	Title Date								
Interviewed 🗆 at site 🛛 at office 🗖	by phone Phone no. <u>(651) 638-2113</u>								
Problems, suggestions; 🛛 Report attached	· · · · · · · · · · · · · · · · · · ·								
······································									
2. O&M staff Bob Hertenstein, City of N.B.	Treatment Plant Operator 3/16/99								
Name	Title Date								
	by phone Phone no. <u>(651) 638-2965</u>								
Problems, suggestions; 🛛 Report attached									

a	N/A	c.) Fili in all that ap			
	Name	•	Title	Date	Phone no.
Problems; si	iggestions;	Report attached			
Agency _					
Contact		••••••••••••••••••••••••••••••••••••••	Title	 	
				Date	Phone no.
Agency	_	·····		·	
Contact	Name		Title	Date	Phone no.
Problems: si	uggestions;				
	···				·
Problems: s		Report attached		Date	Phone no.
Other interv	iews (optional	l) 🗆 Report attac	hed.		
NA					
			·		
				__	
·					·····
		····			

IIL ONSITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)									
1. O&M Manual and As-Builts									
O&M Manual 🛛 🖾 Readily available 🗔 Up to date 🗔 N/A									
As-builts 🛛 🖾 Readily available 🖾 Up to date 🗂 N/A									
Maintenance Logs 🖾 Readily available 🖾 Up to date 🗔 N/A									
Remarks Complete OU3 (PGRS) manuals are located at the PGAC (OUI treatment plant).									
2. Site Specific Health and Safety Plan 🖾 Readily available 🖾 Up to date 🗔 N/A									
Contingency plan/emergency response plan C Readily available Up to date Z N/A Remarks									
3. O&M and OSHA Training Records 🗵 Readily available 🖻 Up to date 🗆 N/A									
Remarks									
4. Permits and Service Agreements									
 □ Air discharge permit □ Readily available □ Up to date ☑ N/A 									
□ Effluent discharge □ Readily available □ Up to date □ N/A									
S Waste disposal, POTW S Readily available S Up to date I N/A									
A Other permits (see remarks)									
Remarks									
1) A MDNR permit exists for groundwater appropriation.									
2) A RCRA hazardous waste generator permit exists for the spent granular activated carbon. Spent carbon									
is returned to the original, clean carbon supplies for regeneration.									
5. Gas Generation Records 🛛 Readily available 🗍 Up to date 🖾 N/A									
Remarks									
6. Settlement Monument Records									
7. Groundwater Monitoring Records 🖾 Readily available 🖾 Up to date 🖾 N/A									
Remarks Groundwater monitoring results are documented in the TCAAP Fiscal Year 1998 Annual									
Performance Report.									
8. Leachate Extraction Records 🛛 Readily available 🗖 Up to date 🗷 N/A									
Remarks									
9. Discharge Compliance Records									
□ Air □ Readily available □ Up to date N/A									
22 Water (effluent) 23 Readily available 28 Up to date 1 N/A									
Remarks									

10	Daily	Access/Security	Logs											
	Readily available D Up to date D N/A													
	Remarks Dally access to site is not logged, but security alarms are operable.													
İ.														
1.	O&M Organization													
1	State in-house Contractor for State													
!	PRP in-house Contractor for PRP													
:	32 Other City of New Brighton													
2.	2. O&M Cost Records													
!	Readily available B Up to data													
ł	E Funding mechanism/agreement in place													
ļ	Original O&M cost estimate _ <u>\$276,000 (OU3 ROD, 1992 dollars)</u> D Breakdown attached													
: 														
	Total annual cost by year for review period if available													
	From	<u>June 1994</u>	To	Dec. 1994	<u>\$94.300</u>	Breakdown attached								
	-	Dates	.	D 1054	Total cost									
	From	Jan. 1995 Dates	. 10	Dec <u>. 1995</u>	<u>\$245.897</u> Total cost	🛛 🖾 Breakdown attached								
	÷	Jan. 1996	T.	Dec. 1996										
	From	Dates	10	Dec. 1990.	<u>\$237,276</u> Total cost	🛛 🗷 Breakdown attached								
	From	Jan. 1997	Та	Dec. 1997	*193.598	Breakdown attached								
	FIOLE	Dates	10	DEG 172(Total cost	tel Dreakuu wii auachea								
	From	Jan. 1998	To	June 1998	566.628	B Breakdown attached								
ļ	11001	Dates	- 10	0k/(c.1770	Total cost	B Dicardown statuen								
f		1.440			101110051									
3.	Unant	icinated or Unu	sually	High O&M (Costs During Review Period									
ţ .														
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i														
	-													
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L		•• ••			····									

V. GENERAL SITE CONDITIONS
Whenever possible, actual site conditions should be documented with photographs. A. Fencing
A. Fedelag
1. Fencing damaged Location shown on site map Gates secured N/A Remarks
B. Site Access
1. Access restrictions, signs, other security measures Remarks <u>When not attended</u> , treatment building is locked and also has security alarms.
C. Perimeter Roads
1. Roads damaged C Location shown on site map E Roads adequate C N/A Remarks
D. General
 Vandalism/trespassing Location shown on site map E No vandalism evident Remarks
2. Land use changes onsite I N/A Remarks
3. Land use changes offsite 🗵 N/A Remarks
 Institutional controls (site conditions imply institutional controls not being enforced) □ N/A Agency <u>Institutional controls are in place (see Section DX).</u> Contact
Name Title Date Phone no. Problems: suggestions; I Report attached
VI. LANDFILL COVER
VII. VERTICAL BARRIER WALLS 🗖 Applicable 🖼 Not applicable
VIIL GROUNDWATER/SURFACE WATER REMEDIES 🔞 Applicable 🗆 Not applicable
A. Groundwater Extraction Wells, Pumps, and Pipelines Applicable
1. Pumps, Wellhead Plumbing, and Electrical
Z Good condition Z All required wells located Needs O&M N/A Remarks
2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appartenances S Good condition I Needs O&M Remarks

B. Surface Water Collection Structures,	Pumps, and Pipelines										
🗆 Applicable 🗵 Not applicable											
1. Collection Structures, Pumps, and El											
📔 🖬 Good condition 🗖 Needs O&M											
Remarks											
· _ ·	clines, Valves, Valve Boxes, and Other Appurtenances										
☐ Good condition ☐ Needs O&M											
Remarks											
C. Treatment System 🛛 Applicable	e 🛛 Not applicable										
1. Treatment Train (Check components t	hat apply)										
Meials removal	Oil/water separation Difference Bioremediation										
📮 Air stripping	🖾 Carbon adsorbers										
G Filters	Others										
🗷 Good condition	Needs O&M										
Sampling ports properly marked and	i functional										
Sampling/maintenance log displayed											
Equipment properly identified											
Quantity of groundwater treated ann	ually <u>Target: 525 million gallons per year</u>										
	nually <u>N/A</u>										
Remarks Sampling and maintenance i	information is maintained in a computer database that is accessible.										
via computers in the PGAC treatment ;	tystem affice.										
·····											
2. Electrical Enclosures and Panels (pro	perly rated and functional)										
R Good condition D Needs O&M											
Remarks											
3. Tanks, Vaults, Storage Vessels	N/A										
Good condition D Proper second	ndary containment 🛛 Needs O&M										
Remarks											
4. Discharge Structure and Appurtenar	nces 🗇 N/A										
E Good condition D Needs O&M											
Remarks											
5. Treatment Building(s) D N/A											
Good condition Needs repaired in the second sec	r										
Chemicals and equipment properly											
Remarks											

6. Monitoring Wells (pump and treatment remedy) 🗵 Property secured/locked
E Functioning E Routinely sampled E Good condition E All required wells located
□ Needs O&M □ N/A
Remarks
D. Monitored Natural Attenuation
 Monitoring Wells (natural attenuation remedy) Property secured/locked
Functioning Routinely sampled
🗆 Good condition 🔲 All required wells located 🔲 Needs O&M 🔳 N/A
Remarks
IX. OTHER REMEDIES
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the
physical nature and condition of any facility associated with the remedy. An example would be soil vapor
extraction, (see additional remedy components below.)
A. Institutional Controls
The OUI Alternative Water Supply and Well Abandonment Program was expanded to cover the OU3
groundwater plume. (See OUI Site Inspection for discussion of this remedy component.)
X. OVERALL OBSERVATIONS
A. Effectiveness of the Remedy
Describe issues and observations relating to whether the remedy is effective and functioning as designed.
Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume,
minimize infitration and gas emission, etc.).
The OU3 groundwater recoverv system (PGRS) is intended to provide containment of the plume (prevent
any plume migration beyond the pumping well, NBM#13). The PGRS is providing the intended plume
capture.
B. Adequacy and the Continued Need for O&M
Describe issues and observations related to the implementation and scope of O&M procedures. In particular,
discuss their relationship to the current and long-term protectiveness of the remedy.
O&M procedures are adequate to ensure the short- and long-term protectiveness of the remedy. The PGRS
Other procedures are adequate to ensure the anort- and arrest protective resteries of the resteries and
operation has provided reliable treatment of the water to drinking water standards and has provided the
operation has provided reliable treatment of the water to drinking water standards and has provided the intended plume containment. The influent to the treatment system has been consistently below MCLs for
operation has provided reliable treatment of the water to drinking water standards and has provided the
operation has provided reliable treatment of the water to drinking water standards and has provided the intended plume containment. The influent to the treatment system has been consistently below MCLs for trichloroethene and other VOCs since January 1997 (26 months). This suggests that the need for continued
operation has provided reliable treatment of the water to drinking water standards and has provided the intended plume containment. The influent to the treatment system has been consistently below MCLs for trichloroethene and other VOCs since January 1997 (26 months). This suggests that the need for continued

C. Early Indicators of Potential Remedy Failure

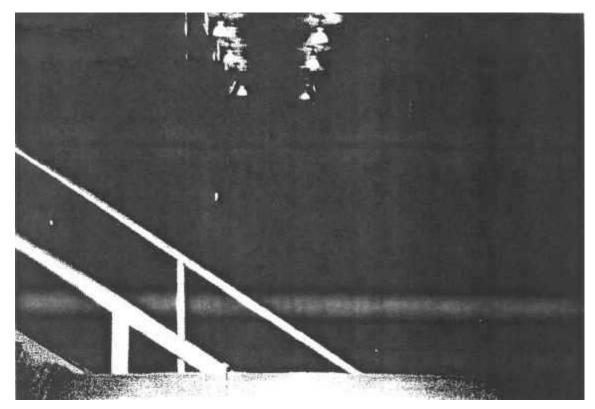
Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency is of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.

D. Opportunities for Optimization

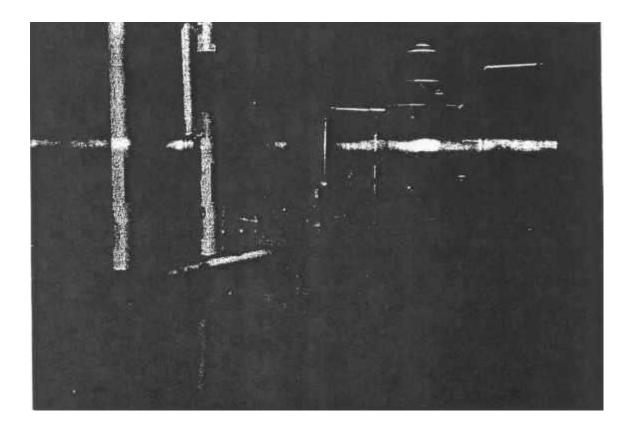
Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. The VOC plume in OU3 appears to be stable or shrinking with time. This, and the declining influent concentrations discussed above, suggest that the need for the current level of hydraulic containment within OU3 should be re-evaluated. Natural attenuation may be responsible for the plume stability and also warrants further evaluation.

ANNUAL FINANCIAL SUMMARIES WATER TREATMENT PLANT #2 680 5th Street NW

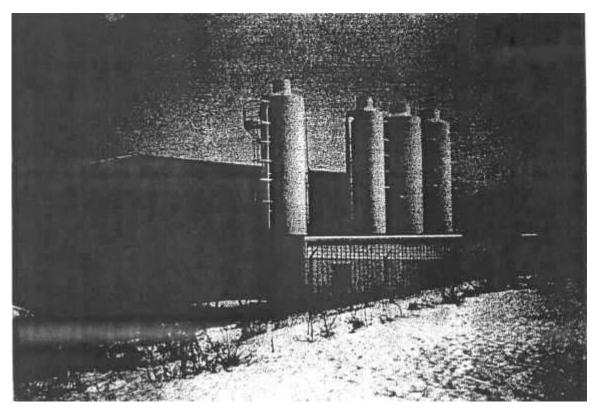
					680 5th Street NV	N						
I:\shared\Alliant\1999\plant 2b										Percent		
31-Jul-98		1994	1995	1996	1997	1997	1998	Thru	1999	Change	2000	2001
		Actual	Actual	Actual	Budget	Actual	Budget	June 98	Budget	98/99	Budget	Budget
REVENUES	_											
U.S. Army		\$215,671	(\$115,254)			\$4,433						
City (2)		\$5,050										
Alliant Tech Used		(\$129,356)	\$356,480	\$232,689	\$252,340	\$181,089	\$227,600	\$53,443	\$204,350	-11.38%	\$200,200	\$210,800
Insurance Dividend			\$879	\$1,260		\$778						
City Contribution		\$2,000	\$3,000	\$3,000	\$3,000		\$6,000	\$6,000	\$3,000	-100.00%	\$3,100	\$3,000
Interest Earnings		\$3,935	\$18,894	\$14,179		\$19,182	\$18,000	\$12,650	\$10,000		\$10,000	\$10,000
TOTAL		\$97,300	\$263,999	\$251,128	\$255,340	\$205,482	\$251,600	\$72,093	\$217,350	-15.76%	\$213,300	\$223,800
MATERIALS AND SUPPLIES												
General Materials	2170	\$3,000	\$978	\$3,996	\$1,000	\$3,097	\$1,000	\$826	\$1,000	0.00%	\$1,000	\$1,000
Chemicals	2175		\$16,779	\$9,647	\$10,220	\$8,787	\$8,500	\$4,639	\$8,500	0.00%	\$8,800	\$9,100
Small Equipment	2280		\$345	\$210	\$100	\$0	\$100	\$0	\$100	0.00%	\$100	\$100
TOTAL		\$3,000	\$18,102	\$13,853	\$11,300	\$11,884	\$9,600	\$5,465	\$9,600	0.00%	\$9,900	\$10,200
CONTRACTUAL SERVICES												
Telephone	3310	\$2,600	\$2,130	\$1,689	\$1,600	\$1,369	\$1,600	\$693	\$1,600	0.00%	\$1,600	\$1,600
Utility Charges	3320	\$27,200	\$39,238	\$37,900		\$41,941		\$17,373			\$0	\$0
NSP Gas					\$5,500		\$4,400		\$2,000	-120.00%	\$2,100	\$6,200
NSP Electric					\$39,000		\$39,500		\$38,600	-2.33%	\$39,800	\$41,000
Insurance	3483		\$3,435	\$3,181	\$5,300	\$1,699	\$4,500	\$776	\$1,000	-350.00%	\$1,000	\$1,000
Building Maintenance	3510		\$3,033	\$4,008	\$1,000	\$1,377	\$1,000	\$577	\$2,500	60.00%	\$2,600	\$2,700
Equipment Maintenance	3520		\$18,453	\$18,950	\$10,000	\$23,891	\$10,300	\$20,222	\$8,000	-28.75%	\$8,200	\$8,400
Other Services	3590							\$142				
Miscellaneous			\$9,352	\$1,194		\$1,520	\$2,500		\$2,500	4.00%	\$2,600	\$2,700
DNR App. Fee				\$2,084	\$2,400	\$2,391	\$2,400		\$2,400		\$2,500	\$2,600
MCWS Industrial Strength charge												
Other				** * * * * *	618 000	60.0F.	AF 000	00.51	AF 000	0.0004	A	A
Sanitary Sewer			\$21,702	\$14,402	\$13,000	\$3,276	\$5,000	\$256	\$5,000	0.00%	\$5,200	\$5,400
SAC City Services	6752			\$14,400		\$0	\$0		\$10,450			
Administartion	0732	\$5,500	\$14,900	\$14,200	\$15,200	\$11,600	\$15,700	\$0	\$16,200	3.09%	\$16,700	\$17,200
Administration		\$5,500	\$10,000	\$14,200	\$15,200	\$11,000	\$15,700	50	\$10,200	5.0570	\$10,700	\$17,200
Administration Correction			\$10,000	(\$10,600)								
Operations		\$59,000	\$77,173	\$62,327	\$78,000	\$56,080	\$80,300	\$0	\$60,000	-33.83%	\$61,800	\$63,700
Engineering	6752		\$41,507	\$64,355	\$61,800	\$47,485	\$63,700	\$25,885	\$55,000	-15.82%	\$56,700	\$58,400
Legal	6755		\$4,674	\$8,936	\$4,800	\$969	\$10,600	\$704	\$2,000	-430.00%	\$2,100	\$2,200
Auditing Services	6755			\$250	\$0	\$0	\$500	\$0	\$500	0.00%	\$500	\$500
TOTAL		\$94,300	\$245,897	\$237,276	\$237,600	\$193,598	\$242,000	\$66,628	\$207,750	-16.49%	\$203,400	\$213,600
D.S.I. CHANGE ORDER 6A					\$23,890 (se	ee 3520)						
TOTAL		\$97,300	\$263,999	\$251,129	\$272,790	\$205,482	\$251,600	\$72,093	\$217,350	-15.76%	\$213,300	\$223,800
Alliant Tech Year-End Payment		\$146,703	\$366,440	\$271,700	\$227,600	\$252,340	\$204,350		\$155,200		\$165,800	\$165,800
Unused Alliant Tech Balance		\$276,059	\$286,019	\$325,030	\$300,290	\$396,281	\$373,031	\$342,838	\$323,881		\$289,481	\$244,481



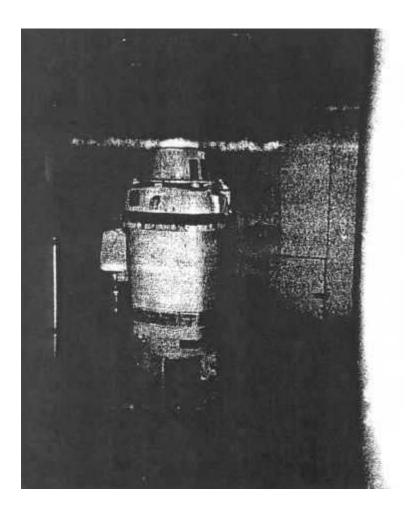
Photograph #1: PGAC Water Treatment Facility (OU1)



Photograph #2: Well NBM #15 Pumphouse (OU1)



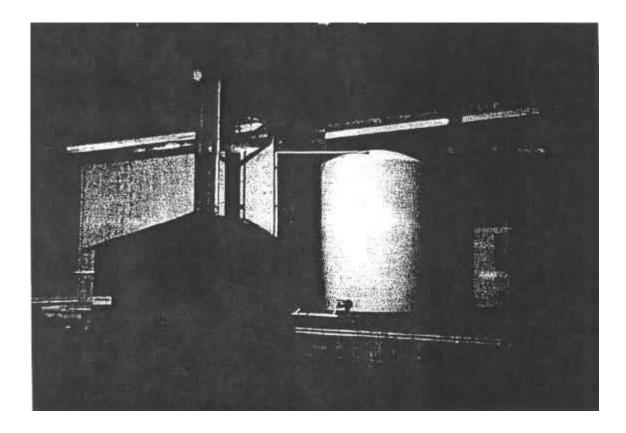
Photograph #3: TGRS Water Treatment Plant (OU2)



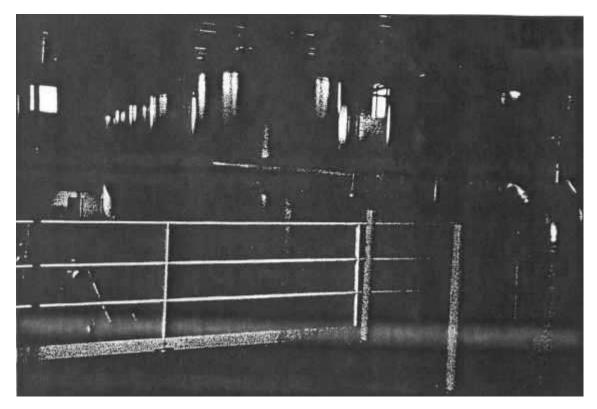
Photograph #4: TGRS Wet Well Pump (OU2)



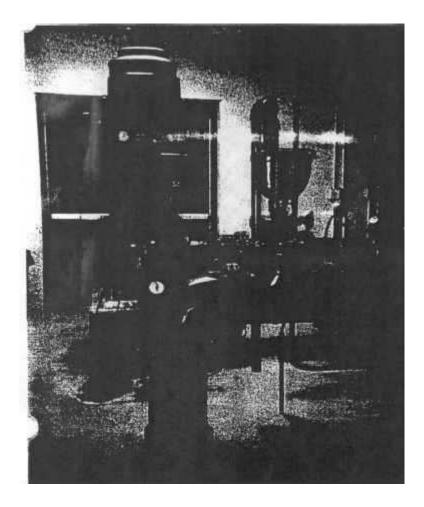
Photograph #5: Site D Shallow Soil SVE System (OU2)



Photograph #6: Site A Groundwater Treatment System (OU2)



Photograph #7: PGRS Water Treatment Facility (OU3)



Photograph #8: Well NBM #13 (OU3) (located inside PGRS building)



Photograph #9: Site Inspection Team