



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

September 20, 2007

Reference No. 002012

Mr. Fred Campbell
MINNESOTA POLLUTION CONTROL AGENCY
Metro District Office
Site Remediation Section
520 Lafayette Rd.
St. Paul, MN 55155-4194

Dear Mr. Campbell:

Re: Annual Monitoring Well Sampling Event
Highway 96 Site - White Bear Township, Minnesota

In compliance with the Consent Order and on behalf of Whirlpool Corporation and Reynolds Metals Company, Conestoga-Rovers & Associates (CRA) is providing notice of the annual monitoring well sampling event associated with the Highway 96 Site in White Bear Township, Minnesota.

MONITORING WELL SAMPLING

On-Site Monitoring Network

The on-Site groundwater monitoring network is shown on Figure 1. The following on-Site monitoring wells will be sampled as part of the annual monitoring well sampling event:

- MW1S and MW1D;
- MW4U, MW4S, and MW4D;
- MW8B;
- MW10D and MW10B;
- MW11D;
- MW12D and MW12B;
- MW13D and MW13B;
- MW16D and MW16B;
- LW1;
- LW2;
- LW3;
- EW1A;
- EW2; and
- Dewatering Sump.

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REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN



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Off-Site Monitoring Network

The off-Site groundwater monitoring network is shown on Figure 2. The following off-Site monitoring wells will be sampled as part of the annual monitoring well sampling event:

- MW17A, MW17B, and MW17L;
- MW18A, MW18B, and MW18L;
- MW19B, MW19L; and
- MW20B.

The following former residential wells that have been converted to monitoring wells will also be sampled as part of the annual monitoring well sampling event:

- 6 Blue Goose;
- 1 Lily Pond;
- 11 Lily Pond; and
- 11 Robb Farm Road.

CRA will notify the above property owners prior to the sampling event.

General Sampling Protocols

During previous annual monitoring well sampling events, monitoring wells were sampled using standard bail/pump and well volume removal techniques, as outlined in the approved Quality Assurance Project Plan (CRA, 1994). However, to be consistent with the 2005 and 2006 annual monitoring well sampling events and recent vertical aquifer profiling (VAP) and monitoring well installation activities, monitoring wells and converted residential monitoring wells will be sampled using low flow groundwater purging and sampling techniques, in general accordance with USEPA guidance¹, as previously approved by the Minnesota Pollution Control Agency (MPCA).

Each monitoring well and converted residential well location will be sampled for volatile organic compounds (VOCs) and chloride. In addition, EW1A, EW2, and the dewatering sump will be sampled for pH, total suspended solids (TSS) and Chemical Oxygen Demand (COD) as required by the MCES Special Discharge Permit.

VOC samples collected from off-Site monitoring well locations and converted residential monitoring well locations will be analyzed by the Minnesota Department of Health (MDH) using methods 460/468. VOC samples collected from on-Site monitoring well locations will be analyzed by Test America (formerly known as Severn Trent Laboratories) in North Canton,

¹ Puls, Robert W. and Barcelona, Michael J., Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures, USEPA Office of Solid Waste and Emergency Response, EPA/540/S-95/504, April 1996.



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Ohio using USEPA method 8260. All chloride, pH, TSS, and COD samples will be analyzed by Test America.

RESIDENTIAL WELL SAMPLING

Residential well sampling associated with the Highway 96 Site is currently being conducted under the "Revised Residential Well Sampling Program", approved by the MPCA on October 2, 2006. The next residential well sampling event is scheduled for October 2007. A separate letter will be sent to the MPCA regarding this event.

SCHEDULE

The annual monitoring well sampling event is scheduled to be conducted the week of October 1, 2007.

If you have any questions or require additional information, please call me at (651) 639-0913.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in blue ink, appearing to read 'S. Illi', is written over the typed name.

Sarah Illi

SI/ma/32

Enc.

c.c.: Nile Fellows; MPCA
Mayor Tom Watson; City of North Oaks
Highway 96 Group

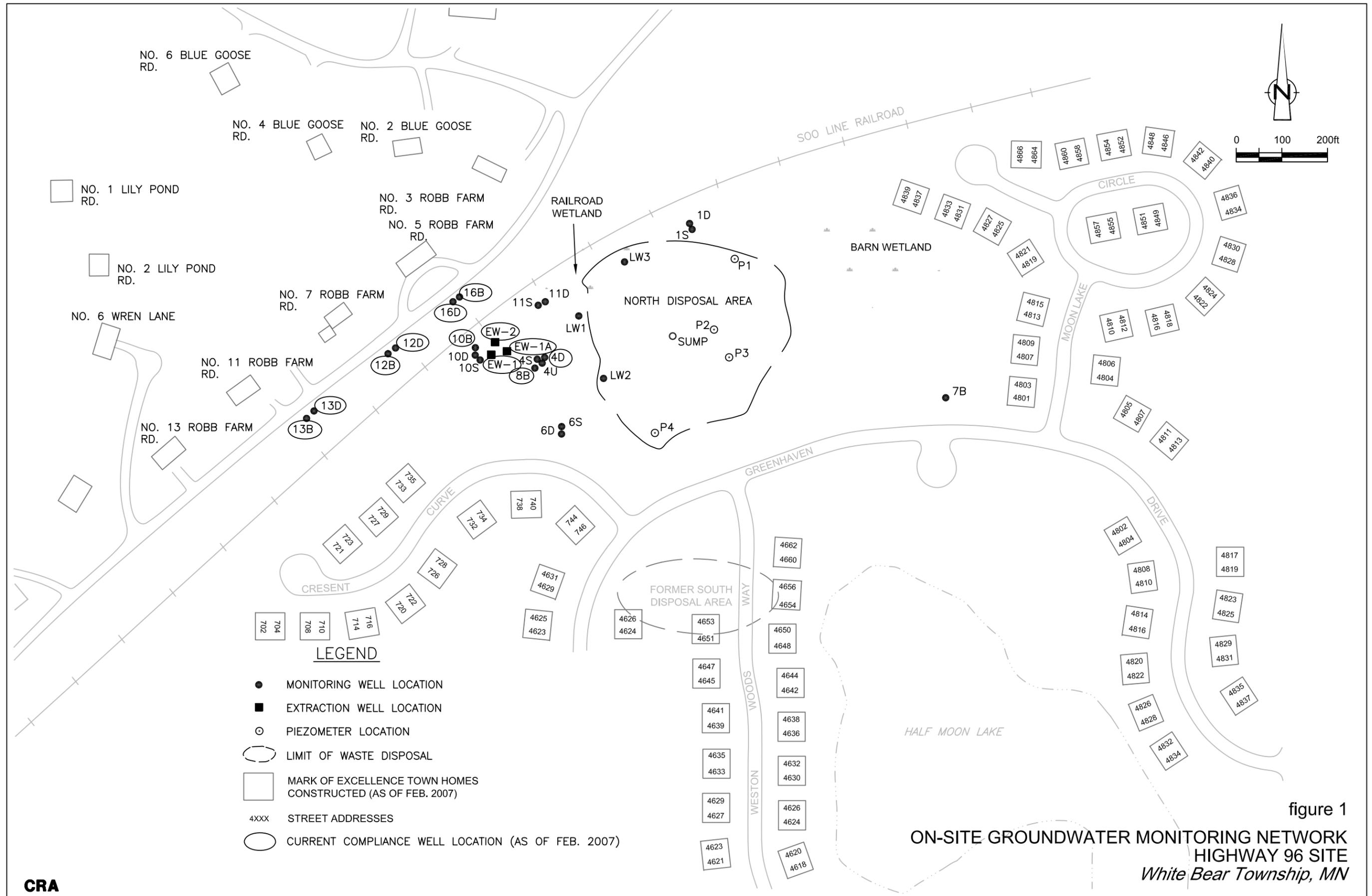


figure 1

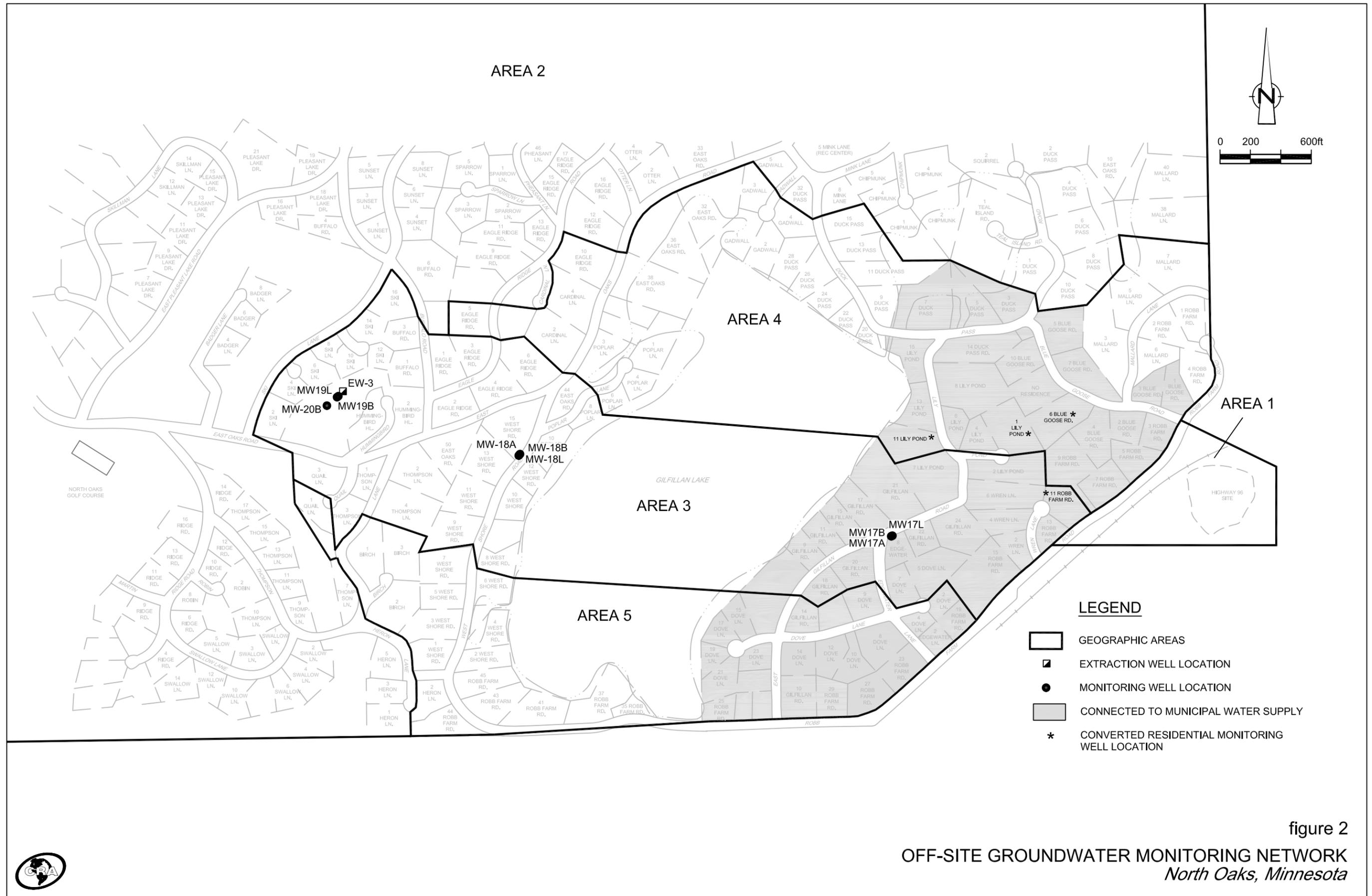


figure 2
OFF-SITE GROUNDWATER MONITORING NETWORK
North Oaks, Minnesota

