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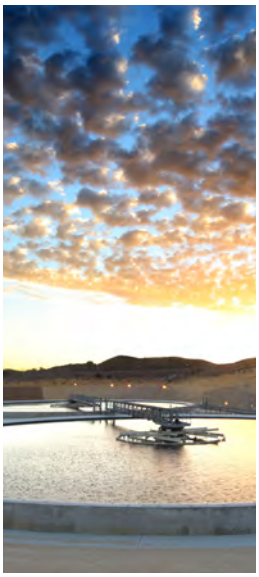
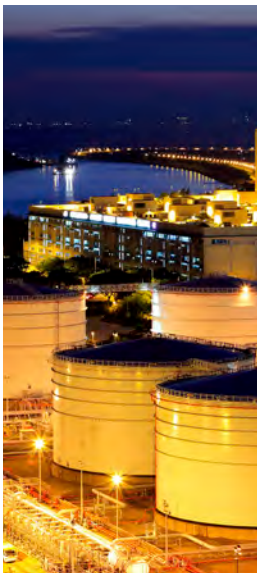


2015 Annual Monitoring Report

Highway 96 Site
White Bear Township, Minnesota

Highway 96 Group

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002012 | Report No 66 | March 14 2016

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1. Introduction

This report presents the results of the 2015 groundwater sampling program conducted at the Highway 96 Site (Site) pursuant to the requirements of the Response Action Plan (RAP), dated January 1994, as amended and referenced in the Consent Order.

This report covers the monitoring period from January 1, 2015 to December 31, 2015.

1.1 Site Description

The Site is located in White Bear Township, Minnesota. The Site location is shown on Figure 1.1. The Site operated as a local disposal area from the 1920s until 1973. Primarily residential wastes were received and burned at the Site. Some drummed wastes were disposed at the Site in the late 1960s and early 1970s. The Site was comprised of two disposal areas, the North and South Disposal Areas, which encompassed 4.5 and 1.5 acres, respectively. A Site Plan is presented on Figure 1.2.

1.2 Project Background

In 1986, a study was conducted at the Site by the United States Environmental Protection Agency (USEPA), which identified groundwater contamination by volatile organic compounds (VOCs). The Minnesota Pollution Control Agency (MPCA) subsequently issued a Request for Response Action (RFRA) to three potentially responsible parties (PRPs): Whirlpool Corporation (Whirlpool), Reynolds Metals Company (Reynolds) and Red Arrow Waste Disposal Services. GHD Services Inc. (GHD) [known as Conestoga-Rovers and Associates (CRA) prior to July 1, 2015] was retained by Reynolds and Whirlpool in 1986 to assist with the implementation of the RFRA.

On behalf of Reynolds and Whirlpool, CRA conducted a Remedial Investigation and Feasibility Study (RI/FS). The RI involved a review of the waste disposal history, installation of monitoring wells, excavation of test pits within the waste, and groundwater monitoring of monitoring wells and nearby residential wells. The results of the RI were submitted to the MPCA in March 1988 (Ref. 1).

In response to the confirmation of groundwater contamination at the Site, Whirlpool and Reynolds proposed an Interim Response Action Plan (IRAP) (Ref. 1) involving the removal of drums found during the investigation and the installation of a groundwater extraction system.

In May 1988, the MPCA approved the RI and IRAP.

The FS involved the evaluation of remedial alternatives, which were presented in the Alternatives Analysis Report (Ref. 2), and was submitted to the MPCA in October 1988. The MPCA approved the Alternative Analysis Report in February 1989. Whirlpool and Reynolds continued with the FS by evaluating potential remedial alternatives. A Detailed Analysis Report (DAR) was submitted to the MPCA in April 1989 (Ref. 3). This evaluation included a proposed remedial plan for the Site. The MPCA did not comment on the DAR until June 1992, and approved the DAR with modifications in June 1994.

In 1993, Reynolds and Whirlpool conducted a groundwater investigation in North Oaks, Minnesota. The groundwater investigation provided a general definition of the groundwater flow system in the vicinity of the Site and the southeast portion of North Oaks. This investigation also delineated the

extent of a remnant VOC plume. Vinyl chloride was the only VOC to exceed the Recommended Allowable Limit (RAL). The North Oaks Southeast Groundwater Investigation report was submitted to the MPCA in October 1993 (Ref. 4).

In January 1994, Whirlpool and Reynolds submitted the Phase I Response Action Plan (Ref. 5) to the MPCA. The Phase I Response Action Plan (Phase I RAP) outlined the activities required for the implementation of the final remedy at the Site. The MPCA approved the Phase I RAP with modifications by letter, dated March 1, 1994.

In May 1994, Whirlpool and Reynolds submitted the Phase II Response Action Plan (Ref. 6) to the MPCA. The Phase II Response Action Plan (Phase II RAP) provided additional construction details on the Phase I RAP and provided details on the installation of a dewatering sump and gas probes. The MPCA approved the Phase II RAP, with modifications by letter, dated October 3, 1994.

1.3 Remedial Actions

As a parallel activity to the RI/FS, interim remedial actions were implemented by Whirlpool and Reynolds. These actions included drum removal, groundwater extraction system installation, North Oaks groundwater investigation, and South Disposal Area investigation. The final remedy for the Site is divided into four operable units: Operable Unit 1 - Source Control, Operable Unit 2 - Groundwater Remediation, Operable Unit 3 - Residential Drinking Water (east of Gilfillan Lake), and Operable Unit 4 - Residential Drinking Water (west of Gilfillan Lake).

1.3.1 Operable Unit 1 - Source Control

During 1987 and 1988, contractors for the responsible parties removed drums containing hazardous substances from the North Disposal Area (NDA). In 1993, additional drums were removed from the South Disposal Area (SDA). In 1994, waste from the NDA and SDA were screened using a backhoe to look for any remaining drums. Drums and drum-related waste identified during the screening process were removed and transported off-Site for disposal. The contractors also drained the pond located within the NDA. All the pond water was discharged to the sanitary sewer, the sediment and material from the pond bottom were screened, and drums of waste were removed. The drums were disposed at licensed facilities in the fall of 1995.

After screening the NDA and the pond, the contractors transferred all waste material from the SDA to the NDA. Tests of the soils underlying the SDA showed no residual contamination, and the SDA was backfilled with clean soil. The results of the SDA investigation were submitted to MPCA in January 1994 (Ref. 7). All waste material at the NDA, including the waste material transferred from the SDA, was compacted, graded, and capped with two feet (ft.) of clean soil and remains on the property. Since the waste areas were combined, the NDA has been referred to as the Consolidated Waste Area (CWA).

In the spring of 1995, a total of six gas probes were installed in the CWA for methane monitoring, in accordance with the Post Closure Operation and Maintenance Plan (O&M Plan) (Ref. 8). The installation and gas probe monitoring conducted in 1995 are discussed in further detail in the Remedial Action Final Report (Ref. 9).

The Source Control Operable Unit remedy was completed in the fall of 1995 and is discussed in further detail in the Remedial Action Final Report (Ref. 9).

In response to the MPCA's comments to the Remedial Action Final Report, three passive methane vents were installed in the CWA in November of 1996 as shown on Figure 1.3. The vents were screened across the entire thickness of the waste to allow for future drawdown due to the operation of the dewatering sump.

1.3.2 Operable Unit 2 - Groundwater Remediation

The Groundwater Remediation Operable Unit began as an interim remedial action and consists of continued operation of the groundwater extraction system and groundwater monitoring.

1.3.2.1 Groundwater Extraction System

Since June 1989, a groundwater extraction system has been in operation at the Site. The extraction system collects groundwater from the Lower Sand and St. Peter Sandstone aquifers; it effectively limits the spread of contamination and removes contaminated groundwater. The contaminated groundwater is discharged directly to the sanitary sewer under a Metropolitan Council Environmental Services (MCES) special discharge permit.

In late 1994, after the consolidation of the NDA and SDA, a dewatering sump was installed directly into and under the CWA. The dewatering sump collects leachate and discharges it to the sanitary sewer. Leachate is produced when rain and melting snow filter through the waste and dissolve chemicals from the waste. The responsible parties operate the dewatering sump to reduce the potential for degradation of the groundwater in the deeper, drinking-water aquifers.

1.3.2.2 Groundwater Monitoring Program

On-Site Monitoring

The on-Site groundwater-monitoring network includes 29 monitoring wells and 3 extraction wells screened in the perched groundwater, the unconsolidated glacial drift aquifer (Lower Sand aquifer), and the St. Peter Sandstone aquifer. The on-Site groundwater monitoring network is shown on Figure 1.2.

Groundwater samples are collected from on-Site extraction wells and select monitoring wells on an annual basis. Additional groundwater samples are collected from the on-Site extraction wells in accordance with the MCES discharge permit requirements. Seven of the 29 on-Site monitoring wells (MW10B, MW12B, MW12D, MW13B, MW13D, MW16B, and MW16D) are designated as compliance wells.

Off-Site Monitoring

The off-Site groundwater-monitoring network includes residential wells, former residential wells that have been converted to monitoring wells, and monitoring wells that have been installed by the responsible parties. The off-Site groundwater monitoring network is shown on Figure 1.4.

Eleven monitoring wells and one test extraction well have been installed off-Site to monitor groundwater conditions downgradient from the Highway 96 Site in the Glacial Drift/Lower Sand, St. Peter Sandstone, and Prairie du Chien aquifers. Groundwater samples are collected from these monitoring wells on an annual basis.

Five former residential wells located east of Gilfillan Lake were converted to monitoring wells following installation of the municipal water system in 1994 (see Section 1.3.3). The five converted residential monitoring wells are located at 6 Blue Goose Road, 1 Lily Pond Road, 11 Lily Pond Road, 11 Robb Farm Road, and 6 Wren Lane. The converted residential monitoring well at 6 Wren Lane was abandoned in May 2000, at the request of the property owner (with MPCA approval). The four remaining converted residential monitoring wells are monitored on an annual basis.

From 1993 to 2004, Whirlpool/Reynolds and the MPCA monitored 51 residential wells located outside the municipal water service area on a regular basis. In 2005, the residential well monitoring network west of Gilfillan Lake was expanded to include an additional 31 residential well locations. The current residential well monitoring network west of Gilfillan Lake includes 78 residential wells. These residential well locations continue to be monitored on a routine basis.

1.3.3 Operable Unit 3 - Residential Drinking Water (East Of Gilfillan Lake)

In 1993, the Minnesota Department of Health (MDH) issued drinking water well advisories to 12 homes in North Oaks between the Site and Gilfillan Lake, because vinyl chloride had been detected in their wells at levels exceeding the health-based risk level that was in place in 1993. Reynolds and Whirlpool chose to address this off-Site contamination by connecting all 60 homes with private wells on the east side of the lake to the White Bear Township municipal water system. These connections were completed in 1994. Figure 1.5 shows the area serviced by municipal water.

1.3.4 Operable Unit 4 - Residential Drinking Water (West Of Gilfillan Lake)

In October 2004, during routine monitoring of residential wells in North Oaks, low levels of vinyl chloride were detected in water samples collected from two residential well locations (12 West Shore Road and 13 West Shore Road). Since October 2004, Reynolds and Whirlpool have conducted extensive studies, under the supervision of the MPCA, to investigate the nature and extent of VOC contamination in residential wells located west of Gilfillan Lake. These studies included:

- 29 rounds of residential well sampling
- Installation of 13 new monitoring wells
- Vertical aquifer profiling (VAP) to provide vertical delineation of groundwater quality
- Installation of a test extraction well west of Gilfillan Lake in the Ski Lane Ravine
- A subsurface geophysical survey of Gilfillan Lake
- Continued monitoring at existing wells in North Oaks and at the Highway 96 Site in White Bear Township

CRA submitted various reports to MPCA that present the results of the studies listed above (Ref. 10, Ref. 11, Ref. 12, Ref. 13, and Ref. 14).

In June 2007, the MPCA requested that Reynolds and Whirlpool complete a Feasibility Study (FS) to evaluate potential response actions for vinyl chloride contaminated groundwater on the west side of Gilfillan Lake. In July 2007, on behalf of Reynolds and Whirlpool, CRA submitted the FS Report (Ref. 15) to MPCA. In September 2007, MPCA provided comments on the FS Report. In

October 2007, CRA provided responses to MPCA's comments on the FS Report. MPCA approved the FS Report, with modifications, in November 2007.

The MPCA used the FS Report to develop a Proposed Plan for an amendment to the Minnesota Decision Document (MDD) for the Highway 96 Site. The Proposed Plan outlined the preferred remedial alternative(s) for the area west of Gilfillan Lake (Operable Unit 4). The Proposed Plan was issued by MPCA on February 15, 2008. MPCA held a public meeting on February 26, 2008 and public comments on the Proposed Plan were accepted until March 21, 2008.

The MPCA reviewed the public comments on the Proposed Plan and prepared an amendment to the MDD and a Responsiveness Summary Document. The MDD amendment, which includes the Responsiveness Summary, was signed by MPCA on August 26, 2008. As outlined in the MDD amendment, the final MPCA-selected remedy for homes located within Operable Unit 4 of the Site includes:

- Provision of a new/deeper residential well in the Prairie du Chien aquifer for homes that are issued a well advisory by the MDH due to Site-related VOCs[1]
- Long term groundwater monitoring
- Conditional installation and operation of a pump out system in the Ski Lane Ravine (in the event that vinyl chloride or another Site-related VOC[1] exceeds its respective health risk limit (HRL) in any of the Ski Lane Ravine monitoring wells)

As part of the long term groundwater monitoring component associated with the MPCA-selected remedy for Operable Unit 4, the MDD Amendment called for installation of two or three angled monitoring wells beneath Gilfillan Lake, while noting that "obtaining access to residential property for the placement of the additional monitoring wells could be a potentially complicating factor." During the period from November 2007 through March 2009, CRA, on behalf of Reynolds and Whirlpool, made several attempts to negotiate access agreements with private property owners for installation of the angled wells. In a letter dated June 1, 2009, CRA provided MPCA with documentation of the access negotiations. Despite reasonable efforts, access for the angled well installations could not be obtained. In a letter dated September 8, 2009, the MPCA acknowledged the attempts made by Reynolds and Whirlpool to obtain access and stated:

> *"…at this time, the MPCA will not require the Responsible Parties to continue their attempts to obtain access to private parties in order to install the proposed angle monitoring wells, nor will the Agency use its statutory authorities, such as condemnation, to gain access to private properties along the western shore of Gilfillan Lake for the purpose of installing the proposed angle monitoring wells."*

[1] As identified on Table 1 of MPCA's MDD Amendment dated August 26, 2008 (1,1,2-trichloroethene (TCE), vinyl chloride, trans-1,2-dichloroethene, 1,1-dichloroethane, benzene, toluene, and methyl ethyl ketone).

2. Scope of the 2015 Annual Monitoring Report

The Annual Monitoring Report is established to report on required activities at the Site as described in the RAP, which include:

- A summary of groundwater elevation data
- A plot of the groundwater elevations for the perched groundwater system
- Groundwater elevation contours for the Lower Sand, St. Peter Sandstone, and Prairie du Chien aquifers
- A plot of total volatile organic compounds (TVOCs) with respect to time for selected wells
- A figure for each monitored groundwater zone showing TVOCs at each monitoring station
- An assessment of the monitoring parameters and sampling frequencies and recommendations for the addition or deletion of monitoring stations

3. Hydrogeologic Update

This section provides a hydrogeologic summary for the Site that includes 2015 groundwater elevation data and performance assessments of the extraction wells and the perched groundwater dewatering sump.

3.1 Geology

The near surface geology of the Site consists of unconsolidated glacial deposits overlying Paleozoic sedimentary bedrock. The topography of the Site is undulating, which is typical of a glacial terrain. The ground surface elevation ranges from 930 to 970 feet above mean sea level (AMSL).

The unconsolidated sediment is highly variable, ranging from clay to gravel size particles. This area has been defined as a complex intermixed deposit of glacial till with sandy loam and sandy clay loam (Ref. 16). The glacial deposit ranges in thickness from 50 to 150 feet.

The glacial deposits are typically underlain by the St. Peter Sandstone. However, erosional remnants of the younger Platteville Limestone and Glenwood Shale exist. The St. Peter Sandstone is classified as a white, fine to medium grained, well-sorted, silica sandstone. The St. Peter Sandstone ranges in thickness from 0 to 150 feet. A 13- to 20-foot thick shale layer typically separates the upper St. Peter Sandstone aquifer from the basal portion of the St. Peter Sandstone aquifer.

The St. Peter Sandstone is underlain by the Prairie du Chien Group. The Prairie du Chien Group consists of interbedded dolomitic limestone and sandstone. Regionally, the Prairie du Chien ranges in thickness from 0 to 250 feet.

Geologic cross-sections have been constructed west (A-A’), northwest (B-B’), and southwest (C-C') from the Site, through North Oaks (Appendix A). The cross-section lines are located on Figure 3.1. Geologic cross section A-A' extends from the Highway 96 Site westward across Gilfillan Lake through the Ski Lane Ravine area to the North Oaks Golf Course. Geologic cross-section B-B' extends from the Highway 96 Site northwest along Duck Pass Road on the northern shore of

Gilfillan Lake. Geologic cross-section C-C' extends from the Dove Lane area (southwest of the Highway 96 Site) to the western shore of Gilfillan Lake.

3.2 Hydrogeology

There are four hydrostratigraphic units: the perched groundwater, the unconsolidated glacial drift aquifer (Lower Sand aquifer), the St. Peter Sandstone aquifer, and the Prairie du Chien aquifer.

Groundwater elevations have been monitored at the Site since July 1987. A historical summary of groundwater elevations is presented in Appendix B. A summary of recent groundwater elevation measurements (collected October 5, 2015) is presented in Table 3.1.

The perched groundwater system is the uppermost water-bearing unit at the Site. Perched groundwater units are topographically restricted and are typically associated with enclosed basins that collect surface runoff. Perched groundwater is observed at the North Disposal Area and the former South Disposal Area. The perched groundwater at the North Disposal Area is of greater areal extent and is likely influenced by the wetland area located immediately to the east. Perched groundwater at the former South Disposal Area covers a smaller area and is not associated with the perched groundwater in the North Disposal Area.

Perched groundwater elevations historically have ranged from 909 feet to 945 feet AMSL. Groundwater flow within this unit is primarily downward to the Lower Sand aquifer. However, some horizontal migration does occur. October 2015 perched groundwater elevations are presented on Figure 3.2.

The Lower Sand aquifer is the uppermost aquifer at the Site. Groundwater is encountered within this unit at an approximate elevation of 900 feet AMSL. Regional groundwater flow within this unit is towards the west, except in areas affected by groundwater pumping. The hydraulic conductivity within the Lower Sand aquifer varies due to its heterogeneous nature and ranges from $2x10^{-3}$ cm/s to $4x10^{-5}$ cm/s. The average linear groundwater flow velocity is estimated to be 40 ft/yr (Ref. 4).

The St. Peter Sandstone aquifer is hydraulically connected to the overlying Lower Sand aquifer. The potentiometric surface of the St. Peter Sandstone aquifer is approximately 896 feet AMSL. Hence, a downward flow component exists between the Lower Sand and St. Peter aquifers, under non-pumping conditions. Similar to the Lower Sand aquifer, groundwater flow within the St. Peter Sandstone aquifer is to the west, except in areas affected by groundwater pumping. In the vicinity of the Site, the average hydraulic conductivity of the upper portion of the St. Peter Sandstone aquifer is calculated at $5x10^{-3}$ cm/s. The average linear groundwater flow velocity for the upper portion of the St. Peter Sandstone aquifer in the vicinity of the Site is estimated at 80 ft/yr (Ref. 4).

October 2015 on-Site groundwater contours for the Lower Sand/St. Peter Sandstone aquifers are presented on Figure 3.3. The groundwater contours depict the influence of the groundwater extraction system (see Section 3.3). Overall, groundwater elevations continue to reflect the heterogeneous nature of the Lower Sand aquifer. As noted on Figure 3.3, some Lower Sand aquifer monitoring locations (e.g., MW10D) are not used for groundwater contouring because they are screened in areas of low permeability soil (i.e., higher silt/clay content).

The St. Peter Sandstone can be divided into two stratigraphic sub-units immediately west of the Highway 96 Site: the upper St. Peter Sandstone and the basal St. Peter Sandstone. Lateral groundwater flow is towards the west for both the upper and basal portions of the St. Peter

Sandstone aquifer. The basal St. Peter has a lower permeability compared to the upper St. Peter aquifer due to its shale content. A shale layer separates the upper and basal portions of the St. Peter Sandstone aquifer and acts as an aquitard.

October 2015 off-Site groundwater contours for the upper St. Peter Sandstone aquifer are presented on Figure 3.4. For the upper St. Peter aquifer, groundwater flow conditions are characterized by the St. Peter Sandstone monitoring wells at the Highway 96 Site along with off-Site monitoring wells located east of Gilfillan Lake (MW17A) and west of Gilfillan Lake (MW18A, MW19A, and MW21A).

October 2015 off-Site groundwater contours for the basal St. Peter Sandstone aquifer are presented on Figure 3.5. Groundwater flow conditions in the basal St. Peter Sandstone aquifer are characterized by off-Site monitoring wells (MW17B, MW18B, MW19B, and MW20B), converted residential monitoring wells (1 Lily Pond, 11 Lily Pond, 6 Blue Goose and 11 Robb Farm Road), and two active residential wells located on the west side of Gilfillan Lake (6 West Shore Road and 38 East Oaks Road). Lateral groundwater flow in the basal St. Peter aquifer is approximately 10 times slower than in the upper St. Peter Sandstone aquifer.

October 2015 off-Site groundwater contours for the Prairie du Chien aquifer are presented on Figure 3.6. Groundwater flow conditions in the Prairie du Chien aquifer are characterized by off-Site monitoring wells MW17L, MW18L, and MW19L. Lateral groundwater flow in the Prairie du Chien aquifer is regionally toward the west (Ref. 17). The Prairie du Chien aquifer underlies the basal St. Peter Sandstone aquifer. The Prairie du Chien has a higher hydraulic conductivity compared to the St. Peter Sandstone, which is attributed to its high fracture density. Based on single well response test data, the hydraulic conductivity of the Prairie du Chien aquifer ranges from 0.03 cm/s to 0.07 cm/s (72 ft/d to 187 ft/d) (Ref. 12), which is comparable to known published values. Applying a regional hydraulic gradient of 0.001 ft/ft and an effective porosity of 0.056 (Ref. 17), the groundwater flow velocity in the Prairie du Chien ranges from 470 to 1,220 ft/yr. This range of flow velocity is attributed to the varying degrees of fractures present in the Prairie du Chien aquifer.

3.3 Groundwater Extraction System Performance Assessment

Since June 1989, operation of a groundwater extraction system in the Lower Sand/St. Peter Sandstone aquifers (EW1/EW1A/EW1B and EW2) has prevented migration of VOCs from the Site. In addition to providing hydraulic containment, the extraction system removes VOCs from the Lower Sand/St. Peter Sandstone aquifers. The extracted water is discharged directly into the sanitary sewer under an MCES special discharge permit.

Hydraulic containment and VOC removal associated with the groundwater extraction system has been achieved through operation of the following extraction wells:

EW1

- Installed in 1989 (Lower Sand aquifer)
- Replaced in 2005 by EW2 (see below)
- Currently used for hydraulic monitoring (only)

EW1A

- Installed in 1995 (Lower Sand aquifer) to supplement EW1
- Replaced in 2010 by EW1B (see below)
- Currently used for hydraulic monitoring (only)

EW2

- Installed in 2005 (Upper St. Peter Sandstone aquifer) to replace EW1
- Current/active pumping well (see Table 3.2 for 2015 operation summary)

EW1B

- Installed in 2010 (Lower Sand aquifer) to replace EW1A
- Current/active pumping well (see Table 3.2 for 2015 operation summary)

The gradual decline of the pumping capacity at the original extraction well (EW1) had been noted in previous annual monitoring reports. The decline of EW1 was attributed to iron fouling and possible deterioration of the well casing. The decline was expected to continue and the need for a replacement well was inevitable in order to maintain flexibility within the groundwater extraction system and ensure hydraulic containment. A new extraction well (EW2) was installed in September 2005 and began operation in January 2006, replacing EW1. A hydraulic response to pumping at EW2 was observed in both the Lower Sand and St. Peter Sandstone aquifers and the installation and operation of EW2 met MPCA's requirements with respect to pumping rate and effluent water quality. Installation and performance testing results were presented to MPCA in February 2006 (Ref. 11).

After 15 years of operation, EW1A productivity declined due to bio-fouling of the well screen and surrounding formation. As noted in previous annual monitoring reports, numerous well rehabilitation events had been performed to address the fouling issues and reestablish productivity at EW1A. In 2009, EW1A showed minimal improvement to rehabilitation efforts. Continued groundwater extraction from the Lower Sand aquifer is needed to maintain a factor of safety in hydraulic capture and provide operational flexibility in the extraction system (i.e., avoid sole reliance on EW2). Therefore, CRA proposed to replace EW1A with a new extraction well (EW1B). In February 2010, CRA submitted a Work Plan to MPCA for installation of a new/replacement extraction well (Ref. 18). MPCA approved the Work Plan, with comments on March 10, 2010. The new extraction well (EW1B) was installed in April 2010 and began operation in May 2010, replacing EW1A. A hydraulic response to combined pumping at EW1B and EW2 was observed in both the Lower Sand and St. Peter Sandstone aquifers. Installation and performance testing results were presented to MPCA in July 2010 (Ref. 19).

The 2015 average monthly extraction rates for EW1B and EW2 are summarized in Table 3.2. EW1B and EW2 operation and maintenance activities from January 2015 through December 2015 are summarized in Table 3.3.

From January 1, 2015 through December 31 2015, approximately 5.1 million gallons of groundwater were extracted by EW1B, removing approximately 4 pounds of VOCs from the Lower Sand/St. Peter Sandstone aquifers. Since 1989, approximately 177 pounds of VOCs have been removed by EW1/EW1A/EW1B. Figure 3.7 illustrates the pounds of TVOCs removed annually by EW1/EW1A/EW1B since 1989. Figure 3.8 illustrates the VOC removal efficiency (in pounds

per million gallons) of EW1/EW1A/EW1B since 1989. Figure 3.9 shows cumulative VOC mass removal by EW1/EW1A/EW1B since 1989.

From January 1, 2015 through December 31, 2015, approximately 5.2 million gallons of groundwater were extracted by EW2, removing approximately 3 pounds of VOCs from the Lower Sand/St. Peter Sandstone aquifers. Since 2006, approximately 22 pounds of VOCs have been removed by EW2. Figure 3.7 illustrates the pounds of TVOCs removed annually by EW2 since 2006. Figure 3.8 illustrates the VOC removal efficiency (in pounds per million gallons) of EW2 since 2006. Figure 3.9 shows cumulative VOC mass removal by EW2 since 2006.

Since 1989, approximately 301 million gallons of groundwater have been extracted by EW1/EW1A/EW1B and EW2. The number of pore volume exchanges since groundwater extraction began can be estimated based on an assumed contaminated aquifer volume. The area would encompass the CWA, which would be from EW1/EW1A/EW1B/EW2 to P3 in an east-west direction (500 feet), and MW1D to P4 in a north-south direction (450 feet). Assuming an aquifer thickness of 60 feet and a porosity of 30 percent, the aquifer volume would be 4,050,000 ft^3, or approximately 30 million gallons. Therefore, approximately 10 aquifer pore volumes have been removed since 1989.

A groundwater capture analysis was presented in CRA's July 2010 report (Ref. 19). The report recommended the groundwater extraction system operate at a combined pumping rate (of EW1B and EW2) between 13 and 20 gpm to obtain a groundwater capture width of 200-300 ft and achieve sufficient hydraulic containment. Based on the 2015 average combined pumping rate of 19.6 gpm (see Table 3.2), the groundwater capture width in the Lower Sand aquifer and the upper portion of the St. Peter Sandstone aquifer is approximately 300 feet (measured at the pumping source). Groundwater elevation measurements collected on October 5, 2015 also provide verification of hydraulic containment of the VOC plume (see Figure 3.3).

Figure 3.10 shows historic TVOC concentrations over time for EW1/EW1A/EW1B and EW2. As typically seen in groundwater extraction systems, TVOCs declined during the initial pumping years of 1989 through 1996 at EW1/EW1A. From 1996 through 2005, TVOCs remained at levels between 50 and 100 μg/L. In 2006, TVOCs began increasing to levels between 100 μg/L and 300 μg/L. The increase in TVOC concentrations at EW1A/EW1B was due almost entirely to increased trichloroethene (TCE) concentrations. Increased TCE concentrations are likely attributed to a combination of delayed migration from the CWA and changes in the volume of groundwater extracted from the Lower Sand aquifer. Delayed migration refers to the later release of VOCs to the Lower Sand aquifer. The CWA is located above a perched groundwater unit that is hydraulically isolated from the regional water table aquifer such that the downward migration of VOCs to the water table aquifer occurs through a zone of partially saturated soil. The rate of downward migration through this partially saturated zone is substantially less than under saturated soil conditions and is dependent on several variable parameters, such as moisture content, soil permeability, and pressure head. Hence, the downward migration rate and time required to reach the water table aquifer can vary both spatially and temporally underneath the CWA. Since 2006, the total volume of groundwater extracted from the Lower Sand aquifer has fluctuated, in conjunction with combined groundwater extraction from the Upper St. Peter Sandstone aquifer (EW2). TCE concentrations in the Lower Sand aquifer increased following commission of EW2 in 2006 and as production decreased at EW1A due to bio-fouling issues. TCE concentrations in the Lower Sand aquifer have generally decreased since commission of EW1B in May 2010, with the exception

of increased concentrations observed in October 2011 when EW1B was temporarily shut down for repair. TCE has not been observed in monitoring locations downgradient of the extraction system.

Figure 3.11 presents a cross-section that depicts subsurface conditions in the vicinity of the groundwater extraction system. As shown on Figure 3.11, the groundwater extraction system effectively captures contaminated groundwater from upgradient areas (e.g., as screened by monitoring wells MW4D and MW8B). The effectiveness of the groundwater extraction system is demonstrated by low to non-detectable VOC concentrations at downgradient compliance wells and the converted residential monitoring wells.

3.4 Dewatering Sump Performance Assessment

Since July 1995, operation of the dewatering sump has resulted in the removal of VOCs from the perched groundwater system within the CWA. The extracted water is discharged directly into the sanitary sewer under an MCES special discharge permit.

The 2015 average monthly extraction rates for the dewatering sump are summarized in Table 3.2. Sump operation and maintenance activities from January 2015 through December 2015 are summarized in Table 3.3.

From January 1, 2015 through December 31, 2015, approximately 1.7 million gallons of groundwater were extracted by the dewatering sump, removing approximately 1 pound of VOCs from the perched groundwater unit. Since 1995, approximately 88 pounds of VOCs have been removed by the dewatering sump. Figure 3.7 illustrates the pounds of TVOCs removed annually by the dewatering sump since 1995. Figure 3.8 illustrates the VOC removal efficiency (in pounds per million gallons) of the dewatering sump since 1995. Figure 3.9 shows cumulative VOC mass removal by the dewatering sump since 1995.

3.5 Assessment of Potential Effects from St. Paul Regional Water Service (SPRWS) Supply Wells

As stated in a letter from CRA to MPCA dated July 26, 2007, Whirlpool and Reynolds shared the City of North Oaks and North Oaks Home Owners Association (NOHOA) concern that future pumping of certain St. Paul Regional Water Services (SPRWS) supply wells located in the Vadnais Heights area could potentially affect contaminant migration in North Oaks. As such, Whirlpool and Reynolds made the commitment at that time to include as part of the Highway 96 Site Annual Reports, an annual assessment of the SPRWS activities.

In 2004, the engineering firm of Bonestroo, Rosene, Anderlik & Associates (Bonestroo), on behalf of the SPRWS, developed a groundwater model for the SPRWS to evaluate the effects of their proposed water supply system on the regional municipal water supply aquifers. Based on a proposed maximum pumping rate of 50 million gallons per day (MGPD), the 2004 groundwater model predicted up to 20 feet of drawdown in the Prairie du Chien (PdC) aquifer and up to 10 feet of drawdown in the St. Peter Sandstone aquifer, in the vicinity of North Oaks.

In May/June 2005, Bonestroo conducted a 30-day pumping test of four SPRWS wells in the Lake Vadnais area, located approximately 12,000 feet southwest of Gilfillan Lake. During the pumping test, the MDNR monitored a PdC aquifer well located near Sucker Lake (approximately 5,000 feet west of Gilfillan Lake), a former Shoreview PdC/Jordan aquifer production well located near County Road E and Lexington Avenue (approximately 22,000 feet west/southwest of Gilfillan Lake), and a

PdC/Jordan well located near the White Bear Township Municipal Building (approximately 8,300 feet east/northeast of Gilfillan Lake). The combined pumping rate during the 30-day pumping test was 19 MGPD (approximately 3,500 gpm, per well). The pumping test results showed that the well located near Sucker Lake and the former Shoreview production well exhibited 4 to 5 feet of drawdown. The pumping test results also showed that the well located near the White Bear Township Municipal Building was outside the pumping influence. Based on the 2005 pumping test results, the MDNR determined that the 2004 groundwater model over predicted drawdown in the vicinity of North Oaks. The MDNR attributed the drawdown differences between the model and the pumping test to a low transmissivity value used in the model. The model was updated in 2011, based on hydraulic conductivity data collected during the 2005 pumping test.

The current SPRWS supply well network includes 10 wells that are installed within the PdC -Jordan aquifer. SPRWS operates select wells on an as-needed basis, to supplement supply from their standard surface water source (the Mississippi River, through the chain of lakes that lead to Lake Vadnais).

In July 2014, the SPRWS conducted a 50 MGPD pumping test for emergency planning purposes, in the event that the current surface water supply should ever become temporarily unusable. The emergency planning test involved pumping all 10 SPRWS wells during a period of typically high groundwater pumping demand (i.e., July and August). The purpose of the pumping test was to determine the sustainability of the system and to identify any significant well interference or drawdown effects.

The 50 MGPD pumping test began on July 24, 2014 and was completed on August 5, 2014. During the test, the Minnesota Department of Natural Resources (MDNR) monitored water levels in several observation wells, including MW-17L, which is located in North Oaks and part of the Highway 96 monitoring well network (see Figure 1.4). The MDNR installed a pressure transducer within the well to record water levels on an hourly basis for the duration of the pumping test.

There were no reported negative impacts or well outages during the course of the pumping test. The maximum drawdown observed at monitoring well MW-17L was 2.7 feet. This amount of drawdown would not cause any issues with operation of private wells within North Oaks, nor would it have an impact on water quality. The drawdown was temporary and it is expected that water levels recovered relatively quickly following termination of the pumping test.

The July/August 2014 SPRWS pumping test was conducted to simulate a worst-case scenario, where St. Paul would be forced to obtain all of their water from groundwater wells instead of their normal surface water source (the Mississippi River, through the chain of lakes that lead to Lake Vadnais). It is expected that this pumping scenario would only be duplicated again in the event of an emergency and it is not expected to be a regular occurrence.

Based on the cumulative information obtained through annual assessments of the SPRWS activities conducted since 2007 and the results from the most recent (2014) pumping test of the SPRWS supply wells, it is now known that the maximum aquifer drawdown resulting from operation of the SPRWS supply wells under a worst-case pumping scenario should not impact the water quality or operation of private wells in North Oaks. As such, assessment of SPRWS activities relative to the Highway 96 Site is no longer needed and annual SPRWS updates should be discontinued.

4. Groundwater Assessment

Groundwater sampling associated with the Highway 96 Site has been conducted since 1986. A total of 74 rounds of groundwater sampling have been conducted at on-Site monitoring wells, off-Site monitoring wells, and residential wells. A summary of historic groundwater sampling events is provided in Table 4.1.

Groundwater sampling events conducted during 2015 are summarized in the following paragraphs.

April 2015 - Residential Well Sampling Event

During the period from April 21 through April 27, 2015, 23 residential wells were sampled in general accordance with the long-term monitoring program outlined in CRA's Feasibility Study Report (dated July 26, 2007 and approved by the Minnesota Pollution Control Agency (MPCA) on November 7, 2007) and as proposed in CRA's letter to MPCA dated April 6, 2015. A complete description of the April 2015 residential well sampling event and the associated analytical results was previously submitted to MPCA in GHD's "April 2015 Residential Well Data Report", dated July 1, 2015.

October 2015 - Residential Well Sampling Event

During the period from October 5 through October 8, 2015, 69 residential wells were sampled in general accordance with the long-term monitoring program outlined in CRA's Feasibility Study Report (dated July 26, 2007 and approved by the Minnesota Pollution Control Agency (MPCA) on November 7, 2007) and as proposed in GHD's letter to MPCA dated August 25, 2015. A complete description of the October 2015 residential well sampling event and the associated analytical results was previously submitted to MPCA in GHD's "October 2015 Residential Well Data Report", dated December 17, 2015.

October 2015- Annual Monitoring Well Sampling Event

During the period from October 5- 9, 2015, on-Site and off-Site monitoring wells and the four converted residential monitoring wells were sampled as part of the Annual Monitoring Well Sampling Program. A technical memo that summarizes the October 2015 Annual Monitoring Well Sampling Event is presented in Appendix C.

4.1 Summary of Site Cleanup Levels

Two sets of Site cleanup levels are used to evaluate groundwater data associated with the Highway 96 Site: Site Cleanup Goals (SCGs) and Health Risk Limits (HRLs).

Site Cleanup Goals (SCGs)

SCGs are established in Amended Table 1 of the 1993 MDD and apply to monitoring wells in Operable Unit 2. The 1993 MDD originally stipulated that SCGs applied to all current and future groundwater monitoring points on the Site (defined as all wells east of Robb Farm Road). Since 1993, the list of monitoring points where SCGs apply has been modified by MPCA. The current list of compliance monitoring wells in Operable Unit 2 where SCGs apply includes: MW10B, MW12B, MW12D, MW13B, MW13D, MW16B, and MW16D. The list of SCGs (Amended Table 1 of the 1993 MDD) is provided in Appendix D.1.

In May 2010, Wenck Associates (on behalf of the City of North Oaks) requested that this section of the Annual Monitoring Report include clarification provided by MPCA in a letter dated August 26, 2009 regarding the rationale for the selection of the SCG for vinyl chloride. In their letter dated August 26, 2009, the MPCA stated:

> *"Groundwater cleanup levels in the original Table 1 of the October 7, 1993 MDD included the Minnesota Department of Health (MDH) Recommended Allowable Limit (RAL) for vinyl chloride of 0.1 µg/L. After submitting a Response Action Plan on January 26, 1994, the RPs took the position that the cleanup level for vinyl chloride was unattainable using a groundwater extraction/containment-type technology. On March 25, 1994, MPCA staff met with the RPs, and agreed to re-examine the cleanup level for vinyl chloride. On April 13, 1994, Whirlpool and Reynolds proposed an amended cleanup level for vinyl chloride of 2 µg/L that was based on a technical rationale (i.e., Site specific information). The technical rationale was based, in part, on the observed attenuation of 1,1-dichloroethane (1,1-DCA), another contaminant of concern at the Site, versus migration distance from the Site and on the assumption that the attenuation of vinyl chloride would parallel that of 1,1-DCA. This rationale predicted that a vinyl chloride concentration of 2 µg/L at the Site would attenuate to less than 0.03 µg/L at the west shore of Gilfillan Lake. On October 3, 1994, after several meetings and discussions with the RPs, the MPCA concluded that a cleanup level of 2 µg/L for vinyl chloride "[was] protective of human health, welfare and the environment, and [did] not allow for further degradation of the groundwater resources of the area." The MPCA agreed to change the Site cleanup level for vinyl chloride to 2 µg/L, following the execution of the Consent Order (CO). The CO, which included the MDD with amended Table 1 as Exhibit A, was executed on January 9, 1995."*

Health Risk Limits (HRLs)

HRLs apply to residential wells in Operable Unit 4, as stipulated in Table 1 and Sections 2.2 and 6.0 of the 2008 MDD Amendment. Specifically, Section 2.2 of the 2008 MDD Amendment states "(the) HRL is the cleanup standard used by the MPCA for vinyl chloride for OU4". Operable Unit 4 is defined as residential areas without municipal water, as shown on Figure 1 of the 2008 MDD Amendment. The 2008 MDD Amendment (including Table 1 and Figure 1) is provided in Appendix D.2.

Since the 2008 MDD Amendment, the MDH has promulgated new HRLs for select Site-related VOCs (as identified on Table 1 of the 2008 MDD Amendment) and other frequently-detected VOCs, listed below:

- 1,1,2 trichloroethene (TCE) [2015 HRL - 0.4 µg/L; previous HRL - 5 µg/L]
- benzene [2009 HRL - 2 µg/L; previous HRL - 5 µg/L]
- dichlorodifluoromethane [2011 HRL - 700 µg/L; previous HRL - 1,000 µg/L]
- toluene [2011 HRL - 200 µg/L; previous HRL - 1,000 µg/L]
- trans-1,2-dichloroethene [2013 HRL - 40 µg/L; previous HRL - 100 µg/L]

Since the 2008 MDD Amendment, the MDH has issued new Health Based Guidance (HBG) in the form of Health Based Values (HBVs) and Risk Assessment Advice (RAA) for select Site-related

VOCs (as identified on Table 1 of the 2008 MDD Amendment) and other frequently-detected VOCs, listed below:

- 1,1-dichloroethane [2015 RAA - 80 µg/L; previous HRL (1993) - 70 µg/L repealed in 2015]
- cis-1,2-dichloroethene [2014 HBV - 6 µg/L; current HRL (2009) - 50 µg/L]
- dichlorofluoromethane [2015 RAA - 30 µg/L; no previously-established HRL/HBV/RAA]

HBVs are developed as interim guidance until they are promulgated as new HRLs through formal rulemaking. RAAs may be based on more limited data than HRLs, or may use new methodology. Where multiple HBG criteria are available, the lowest criterion is used for screening purposes.

Laboratory reporting limits are reviewed on a semi-annual basis (and adjusted, if necessary) to ensure they remain inclusive of any new HBVs/RAAs that are issued or new HRLs that have been promulgated.

4.2 Historical Overview of Groundwater Data

Groundwater analytical laboratory data are validated for quality assurance by GHD and compiled into a computer database for the purpose of data management and reporting. Groundwater data are managed according to five well groupings:

- Perched groundwater unit
- Lower Sand aquifer
- St. Peter Sandstone aquifer
- Prairie du Chien aquifer
- Residential wells

A historical data summary, which identifies chemical concentrations of VOCs over time at each monitoring location, is presented in Appendix E. Historical VOC data for the current compliance monitoring wells (MW10B, MW12B, MW12D, MW13B, MW13D, MW16B, and MW16D) are provided in Appendix E.1. Historical VOC data for all other monitoring wells are provided in Appendix E.2. Historical VOC data for residential wells are presented in Appendix E.3.

A series of graphs showing TVOC concentrations over time for select wells are presented on Figures 3.10 and 4.1 through 4.10.

TVOC concentrations in the perched groundwater unit are represented by LW3 (Figure 4.1).

- LW3 data represent perched groundwater beneath the limits of the CWA. Figure 4.1 illustrates TVOC concentrations in the perched groundwater unit decreasing from 1987 through 1991, and remaining relatively stable and less than 50 µg/L since 2001. In October 2015, the TVOC concentration at LW3 was 12.62 µg/L.

TVOC concentrations in the Lower Sand aquifer are represented by MW4D (Figure 4.2), EW1/EW1A/EW1B (Figure 3.10), and MW12D (Figure 4.3).

- MW4D data represent groundwater in the Lower Sand aquifer immediately downgradient of the CWA. Figure 4.2 illustrates TVOC concentrations at MW4D decreasing from 1987 through

1991, and ranging from 50 μg/L to 500 μg/L since 1991. In October 2015, the TVOC concentration at MW4D was 281.9 μg/L.

- EW1/EW1A/EW1B data represent groundwater from the Lower Sand and St. Peter Sandstone aquifers that is captured by the extraction system. Figure 3.10 illustrates TVOC concentrations at EW1/EW1A/EW1B (see Section 3.3.).
- MW12D data represent groundwater in the Lower Sand aquifer downgradient of the extraction system. Figure 4.3 illustrates TVOC concentrations at MW12D, which have historically remained below 3 µg/L since 1997. In October 1996, the TVOC concentration was near 400 µg/L. That sample result is considered anomalous because TVOC concentrations were not observed at or near that level prior to or after that sample date. In October 2015, the TVOC concentration at MW12D was 0.3 μg/L.

TVOC concentrations in the St. Peter Sandstone aquifer, are illustrated by MW8B (Figure 4.4), EW2 (Figure 3.10), MW12B (Figure 4.5), and four converted (former) residential monitoring wells (Figures 4.6 through 4.9).

- MW8B is located between the CWA and the groundwater extraction system. MW8B data represent groundwater in the St. Peter Sandstone aquifer immediately downgradient of the CWA. Figure 4.4 illustrates TVOC concentrations at MW8B, which have ranged from 1 μg/L to 300 μg/L over the past 20 years. In October 2015, the TVOC concentration at MW8B was 13.1 μg/L. TVOC concentrations at MW8B have decreased significantly since the commission of extraction well EW2 in January 2006.
- EW2 data represent groundwater from the Lower Sand and St. Peter Sandstone aquifers that is captured by the extraction system. EW2 was installed in September 2005 and commissioned in January 2006. Figure 3.10 illustrates TVOC concentrations at EW2, which have remained below 100 µg/L since 2005.
- MW12B data represent groundwater in the St. Peter Sandstone aquifer downgradient of the extraction system. Figure 4.5 illustrates TVOC concentrations at MW12B, which have historically remained below 6 µg/L since 1997. In October 2015, there were no VOCs detected at MW12B.
- Data from the four converted residential monitoring wells represent groundwater in the St. Peter Sandstone aquifer further downgradient of the Highway 96 Site. Figure 4.6 illustrates that TVOC concentrations at 11 Robb Farm Road decreased from 1989 through 1992 and have remained relatively stable (below 10 µg/L) since 1990. In October 2015, the TVOC concentration at 11 Robb Farm Road was 0.45 µg/L. Figure 4.7 illustrates that TVOC concentrations at 1 Lily Pond Road have fluctuated between not detected and 30 µg/L since sampling began in 1990. In October 2015, the TVOC concentration at 1 Lily Pond Road was 13.1 µg/L. Figure 4.8 illustrates that TVOC concentrations at 11 Lily Pond Road have typically remained below 5 µg/L since 1996. In October 2015, there were no VOCs detected at 11 Lily Pond Road. Figure 4.9 illustrates that TVOC concentrations at 6 Blue Goose Road have remained below 5 µg/L since 1997. In October 2015, there were no VOCs detected at 6 Blue Goose Lane. The overall decline of TVOC concentrations at the four converted residential well locations can be attributed to Site remediation activities and natural attenuation.

TVOC concentrations in the Prairie du Chien aquifer are illustrated by MW17L (Figure 4.10).

- Data from MW17L represent groundwater in the Prairie du Chien aquifer downgradient of the Highway 96 Site. Figure 4.10 illustrates that TVOC concentrations at MW17L have remained below 10 µg/L since sampling began at this location in 2005. In October 2015, the TVOC concentration at MW17L was 1.2 µg/L.

TVOC concentrations will continue to be evaluated through future groundwater monitoring.

4.3 2015 Data Presentation

Laboratory analytical reports for samples collected in 2015 are presented in Appendix F. Analytical data quality assessment and validation of all results was conducted by the CRA quality control/quality assurance (QA/QC) officer. Data quality assessment and validation memos are also presented in Appendix F.

Analytical results for samples collected in 2015 from the perched groundwater unit, Lower Sand aquifer, St. Peter Sandstone aquifer, and Prairie du Chien aquifer monitoring wells are presented in Tables 4.2 through 4.5, respectively. Analytical results for samples collected in 2015 from residential wells are presented in Table 4.6.

To illustrate the data, Figures 4.11 through 4.16 show the distribution of TVOCs detected in 2015 in the perched groundwater unit, Lower Sand aquifer, St. Peter Sandstone aquifer (on-Site monitoring wells), St. Peter Sandstone aquifer (off-Site monitoring wells), Prairie du Chien aquifer, and in residential wells, respectively.

4.3.1 Perched Groundwater Unit

Six perched groundwater wells (LW1, LW2, LW3, MW1S, MW4U, and the dewatering sump) were sampled in 2015. Perched groundwater analytical results from 2015 are presented in Table 4.2 and on Figure 4.11. Historical perched groundwater VOC results are presented in Appendix E.2.

Compliance Monitoring Wells

None of the perched monitoring well locations are included in the current list of compliance monitoring wells.

Monitoring Wells

VOCs detected in 2015 in perched groundwater samples included: 1,1-dichloroethane, 1,2-dichloroethane, acetone, benzene, chloroethane, chloroform cis-1,2-dichloroethene, dichlorodifluoromethane, dichlorofluoromethane, ethyl ether, ethylbenzene, isopropylbenzene, methyl ethyl ketone, toluene, trans-1,2-dichloroethene, TCE, vinyl chloride, and xylenes. Detections of these VOCs are generally consistent with historical sampling results.

For comparison purposes, vinyl chloride was the only VOC detected in perched groundwater monitoring well samples collected in 2015 at concentrations above their respective SCGs (established for compliance wells only). In 2015, vinyl chloride was detected above its SCG (2 µg/L) at the dewatering sump (maximum concentration reported was 26 µg/L) and MW4U (42 µg/L). Monitoring well MW4U is located between the CWA and the groundwater extraction system and represents the perched groundwater conditions immediately downgradient of the CWA. The dewatering sump is located in the center of the CWA and captures perched groundwater at this location.

The 2015 chloride concentrations in the perched groundwater unit ranged from 6.8 mg/L (LW2) to 150 mg/L (MW4U). Chloride has historically been detected in groundwater samples from perched groundwater wells at concentrations within this range.

4.3.2 Lower Sand Aquifer

Nine Lower Sand aquifer monitoring wells (EW1B, MW1D, MW4S, MW4D, MW10D, MW11D, MW12D, MW13D and MW16D) were sampled in 2015. Lower Sand aquifer analytical results from 2015 are presented in Table 4.3 and on Figure 4.12. Historical Lower Sand aquifer VOC results at the current compliance monitoring wells and other monitoring wells are presented in Appendix E.1 and Appendix E.2, respectively.

Compliance Monitoring Wells

The Lower Sand aquifer compliance monitoring wells (MW12D, MW13D, and MW16D) are located on-Site, along the east side of Robb Farm Road and represent Lower Sand aquifer groundwater immediately downgradient of the on-Site extraction system. VOCs detected in 2015 in Lower Sand aquifer compliance well samples included: 1,1-dichloroethane, chloroethane, cis-1,2-dichloroethene, and dichlorofluoromethane. All 2015 analytical results from the Lower Sand aquifer compliance monitoring wells were below their respective SCGs.

Other Monitoring Wells

The remaining Lower Sand aquifer monitoring wells are also located on-Site. VOCs detected in 2015 in the other Lower Sand aquifer monitoring well samples included: 1,1-dichloroethane, 1,2-dichloroethane, acetone, benzene, chloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, dichlorofluoromethane, methyl isobutyl ketone, methylene chloride, toluene, trans-1,2-dichloroethene, TCE, and vinyl chloride. Detections of these VOCs are generally consistent with historical sampling results.

For comparison purposes, 1,1-dichloroethane, 1,2-dichloroethane, methylene chloride, TCE, and vinyl chloride were the only VOCs detected in non-compliance Lower Sand aquifer monitoring well samples collected in 2015 at concentrations above their respective SCGs (established for compliance wells only). In 2015, 1,1-dichloroethane was detected above its SCG (70 µg/L) at MW4D (100 µg/L), 1,2-dichloroethane was detected above its SCG (4 µg/L) at MW4D (13 µg/L), methylene chloride was detected above its SCG (5 µg/L) at MW4D (6.2 ug/L), TCE was detected above its SCG (5 µg/L) at EW1B (maximum concentration reported was 71 µg/L), and vinyl chloride was detected above its SCG (2 µg/L) at MW4S (100 µg/L), MW4D (16 µg/L) and at EW1B (maximum concentration reported was 6.1 µg/L). Monitoring wells MW4S and MW4D are located between the CWA and the groundwater extraction system and represent Lower Sand aquifer groundwater conditions immediately downgradient of the CWA. EW1B represents groundwater from the Lower Sand and St. Peter Sandstone aquifers that is captured by the extraction system.

The 2015 chloride concentrations in the Lower Sand aquifer ranged from 11 mg/L (MW12D) to 350 mg/L (MW4D). Chloride has historically been detected in groundwater samples from Lower Sand aquifer wells at concentrations below 1,000 mg/L.

4.3.3 St. Peter Sandstone Aquifer

Nineteen St. Peter Sandstone aquifer monitoring wells (MW8B, MW10B, MW12B, MW13B, MW16B, MW17A, MW17B, MW18A, MW18B, MW19A, MW19B, MW20B, MW21A, EW2, EW3, and

the four converted residential monitoring wells) were sampled in 2015. St. Peter Sandstone aquifer analytical results from 2015 are presented in Table 4.4 and on Figure 4.13 (on-Site monitoring locations) and Figure 4.14 (off-Site monitoring locations). Historical St. Peter Sandstone aquifer VOC results at the current compliance monitoring wells, and other monitoring wells are presented in Appendix E.1 and Appendix E.2, respectively.

Compliance Monitoring Wells

The St. Peter Sandstone aquifer compliance monitoring wells (MW10B, MW12B, MW13B, and MW16B) are located on-Site, along the east side of Robb Farm Road and represent St. Peter Sandstone aquifer groundwater immediately downgradient of the on-Site extraction system. VOCs detected in 2015 in the St. Peter Sandstone aquifer compliance well samples included: dichlorodifluoromethane, and dichlorofluoromethane. All 2015 analytical results from the St. Peter Sandstone aquifer compliance monitoring wells were below their respective SCGs.

Other Monitoring Wells

The remaining St. Peter Sandstone aquifer monitoring wells are located both on-Site and off-Site.

St. Peter Sandstone aquifer monitoring wells MW8B and EW2 are located on-Site. MW8B is located between the CWA and the groundwater extraction system, and represents St. Peter Sandstone aquifer groundwater immediately downgradient of the CWA. EW2 represents groundwater from the St. Peter Sandstone aquifer that is captured by the extraction system.

VOCs detected in 2015 from the St. Peter Sandstone aquifer samples collected from MW8B and EW2 included: 1,1-dichloroethane, 1,2-dichloroethane, benzene, chloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, dichlorofluoromethane, methylene chloride, toluene, TCE, and vinyl chloride. Detections of these VOCs are generally consistent with historical sampling results.

For comparison purposes, vinyl chloride was the only VOC detected in on-Site, non-compliance St. Peter Sandstone aquifer monitoring well samples collected in 2015 at a concentration above its respective SCG (established for compliance wells only). In 2015, vinyl chloride was detected above its SCG (2 µg/L) at EW2 (maximum concentration reported was 9.3 µg/L).

St. Peter Sandstone aquifer monitoring wells MW17A, MW17B, MW18A, MW18B, MW19A, MW19B, MW20B, MW21A, EW3, and the four converted residential monitoring wells (6 Blue Goose Road, 1 Lily Pond Road, 11 Lily Pond Road, and 11 Robb Farm Road) are located off-Site and represent groundwater in the St. Peter Sandstone aquifer, downgradient of the Highway 96 Site.

VOCs detected in 2015 in the St. Peter Sandstone aquifer samples collected from off-Site monitoring locations included: 1,1-dichloroethane, dichlorodifluoromethane, dichlorofluoromethane, and vinyl chloride. Detections of these VOCs are generally consistent with historical sampling results.

For comparison purposes, vinyl chloride was the only VOC detected in 2015 in off-Site St. Peter Sandstone aquifer monitoring well samples at a concentration above its MDH HRL (established for private drinking water supplies). In 2015, vinyl chloride was detected above its HRL (0.2 µg/L) at MW17B (0.25 µg/L). The concentration of vinyl chloride in the St. Peter Sandstone aquifer on the east side of Gilfillan Lake, as represented by MW17B, is generally lower compared to historical sampling results from 1993/1994 in the 15 Gilfillan Road/17 Gilfillan Road/8 Edgewater Lane area.

The lower vinyl chloride concentrations are attributed to Site remediation activities and natural attenuation.

The 2015 chloride concentrations in the St. Peter Sandstone aquifer ranged from 1.1 mg/L (MW10B) to 75.6 mg/L (MW19A). Chloride has historically been detected in groundwater samples from St. Peter Sandstone aquifer wells at similar concentrations.

4.3.4 Prairie du Chien Aquifer

Three Prairie du Chien aquifer monitoring wells (MW17L, MW18L, and MW19L) were sampled in 2015. Prairie du Chien aquifer analytical results from 2015 are presented on Table 4.5 and Figure 4.15. Historical Prairie du Chien aquifer VOC results are presented in Appendix E.2.

Compliance Monitoring Wells

None of the Prairie du Chien aquifer monitoring well locations are included in the current list of compliance monitoring wells.

Other Monitoring Wells

MW17L, MW18L, and MW19L are located off-Site and represent groundwater in the Prairie du Chien aquifer, downgradient of the Highway 96 Site. In 2015, VOCs detected in the Prairie du Chien aquifer monitoring wells included: toluene.

For comparison purposes, all 2015 VOC detections in samples collected from the Prairie du Chien aquifer monitoring wells were below MDH HRLs (established for private drinking water supplies).

Analytical results from MW17L, MW18L, and MW19L demonstrate that the Prairie du Chien aquifer is not impacted and continues to represent a suitable alternative water supply for the MPCA-selected remedy outlined in the 2008 MDD Amendment (i.e., installation of new/deeper wells for homes located in Operable Unit 4 that are issued a well advisory due to Site-related VOCs[2].)

The 2015 chloride concentrations in the Prairie du Chien aquifer ranged from 10.3 mg/L (MW17L) to 16.9 mg/L (MW18L). Chloride has historically been detected in groundwater samples from Prairie du Chien aquifer wells at similar concentrations.

4.3.5 Residential Wells

A total of 69 residential well locations were sampled in 2015. Residential well analytical results from 2015 are presented in Table 4.6 and on Figure 4.16. Historical residential well VOC results are presented in Appendix E.3.

In 2015, vinyl chloride was not detected at any residential well location.

Figure 4.17 presents the maximum vinyl chloride concentrations detected in off-Site monitoring well locations and residential wells in 2015. As shown on Figure 4.17, in 2015, vinyl chloride was detected above its HRL (0.2 μg/L) at one monitoring well location (MW17B) (see Section 4.3.3).

[2] As identified on Table 1 of MPCA's MDD Amendment dated August 26, 2008 (1,1,2-trichloroethene (TCE), vinyl chloride, trans-1,2-dichloroethene, 1,1-dichloroethane, benzene, toluene, and methyl ethyl ketone).

Residential well sampling conducted during the period from October 2004 through October 2015 of over 80 residential wells located in the southeast portion of North Oaks has shown that the number of residential wells west of Gilfillan Lake that have ever had detectable concentrations of vinyl chloride is limited to ten locations:

- 50 East Oaks Road (last detected in April 2014)
- 2 Heron Lane (last detected in February 2013; well replaced/abandoned)
- 3 Heron Lane (last detected in May 2012)
- 1 Hummingbird Hill (last detected in May 2013)
- 2 Hummingbird Hill (last detected in September 2009; well replaced/abandoned)
- 10 West Shore Road (last detected in April 2014)
- 11 West Shore Road (last detected in April 2014)
- 12 West Shore Road (last detected in August 2010; well replaced/abandoned)
- 13 West Shore Road (last detected in March 2009; well replaced/abandoned)
- 15 West Shore Road (last detected in April 2014)

Graphs of vinyl chloride trends at the above-referenced residential wells and off-Site monitoring well locations where vinyl chloride has been detected are presented in Appendix G.

VOCs detected in the residential well samples collected in 2015 included: 1,1-dichloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, and dichlorofluoromethane. All detected concentrations were below their respective HBG criteria (i.e., HRLs, HBVs, RAAs).

The 2015 chloride concentrations in the residential wells ranged from 1.0 mg/L (1 Robb Farm Road) to 103 mg/L (4 Thompson Lane). Chloride has historically been detected at similar concentrations in residential well samples.

4.3.5.1 New Residential Well Installations

As stipulated in the recent MDD amendment for the Highway 96 Site (signed August 26, 2008), the MPCA-selected remedy, for homes located within Operable Unit 4 of the Site that have been issued a well advisory by MDH due to Site-related VOCs[3], is provision of a new/deeper residential well in the Prairie du Chien aquifer.

To date (March 2016), MDH has only issued well advisories to three locations in Operable Unit 4 due to Site-related VOCs[3]: 13 West Shore Road (August 2007), 12 West Shore Road (December 2008), and 2 Heron Lane (November 2012).

13 West Shore Road

On August 15, 2007, the MDH issued a well advisory to 13 West Shore Road based on the April 2007 detection of vinyl chloride equal to the HRL and the additive risk associated with additional VOC detections. On October 10, 2008, Whirlpool and Reynolds sent a letter to the

[3] As identified on Table 1 of MPCA's MDD Amendment dated August 26, 2008 (1,1,2-trichloroethene (TCE), vinyl chloride, trans-1,2-dichloroethene, 1,1-dichloroethane, benzene, toluene, and methyl ethyl ketone).

homeowner at 13 West Shore Road to initiate arrangements for installation of a new residential well in the Prairie du Chien aquifer, in accordance with the MDD amendment. In January 2009, the homeowners at 13 West Shore Road agreed to allow installation of a new residential well. Installation of the new residential well at 13 West Shore Road was completed in March 2009. As part of that well installation, the homeowners decided, at their own expense, to have the new residential well advanced into the underlying Jordan Sandstone aquifer for their drinking water source. The former residential well at 13 West Shore Road was abandoned in March 2009, at the request of the homeowner (with MPCA approval).

12 West Shore Road

On December 8, 2008, the MDH issued a well advisory to 12 West Shore Road based on the October/November 2008 detections of vinyl chloride above the HRL. On December 16, 2008, Whirlpool and Reynolds sent a letter to the homeowner at 12 West Shore Road to initiate arrangements for installation of a new residential well in the Prairie du Chien aquifer, in accordance with the MDD amendment. In August 2009, the homeowners at 12 West Shore Road agreed to allow installation of a new residential well. Coordination of the new residential well installation at 12 West Shore Road began in September 2009. An inoperable well was discovered in the basement of the home that predated the homeowner's current well. Further investigation was necessary to verify abandonment of the inoperable well before installation of the new/deeper residential well. In March 2010, the inoperable well was abandoned in accordance with MDH requirements. Installation of the new residential well at 12 West Shore Road was completed in August 2010. As part of the well installation planning process, the homeowners decided, at their own expense, to have the new residential well advanced into the underlying Jordan Sandstone aquifer for their drinking water source. The former residential well at 12 West Shore Road was abandoned in August 2010, at the request of the homeowner (with MPCA approval).

2 Heron Lane

On November 29, 2012, the MDH issued a well advisory to 2 Heron Lane based on the October 2012 detection of vinyl chloride above the HRL. On December 6, 2012, CRA, on behalf of Whirlpool and Reynolds, sent a letter to the homeowner at 2 Heron Lane to initiate arrangements for installation of a new residential well in the Prairie du Chien aquifer, in accordance with the MDD amendment. In January 2013, the homeowners at 2 Heron Lane agreed to allow installation of a new residential well. Installation of the new residential well at 2 Heron Lane was completed in February 2013. The former residential well at 2 Heron Lane was abandoned in February 2013, at the request of the homeowner (with MPCA approval).

In 2009, two additional residential wells in Operable Unit 4 were replaced with new/deeper wells in the Jordan Sandstone aquifer: 2 Hummingbird Hill and 2 Thompson Lane.

2 Hummingbird Hill

Although not required by MPCA under the MDD amendment, Whirlpool and Reynolds also extended a voluntary offer to provide a new residential well in the Prairie du Chien aquifer to the homeowner at 2 Hummingbird Hill. In January 2009, the homeowner at 2 Hummingbird Hill accepted Whirlpool's and Reynolds' voluntary offer to install a new residential well. Installation of the new residential well at 2 Hummingbird Hill was completed in March 2009. As part of that well installation, the homeowner decided, at their own expense, to have the new residential well advanced into the underlying Jordan Sandstone aquifer for their drinking water source. The former

residential well at 2 Hummingbird Hill was abandoned in September 2009, at the request of the homeowner (with MPCA approval).

2 Thompson Lane

In July 2009, a new/deeper residential well was installed at 2 Thompson Lane. The well replacement at 2 Thompson Lane was not required by MPCA under the MDD amendment. The existing well was replaced by the homeowner reportedly due to failure of the well casing (i.e., sand in the water supply). The homeowners decided, at their own expense, to replace their existing residential well in the St. Peter Sandstone aquifer with a new residential well advanced into the underlying Jordan Sandstone aquifer. The former residential well at 2 Thompson Lane was abandoned, in accordance with MDH well code requirements.

4.3.5.2 Status of MDH HRL Rule Revision for Vinyl Chloride

In a letter from CRA to MPCA dated July 26, 2007, Whirlpool and Reynolds made the commitment to include as part of the Highway 96 Site Annual Report, a status update on the MDH HRL Rule Revision for vinyl chloride.

- The current HRL for vinyl chloride (0.2 μg/L) was established by the MDH in 1993/1994.
- In December 2004, the MDH proposed a draft revised HRL for vinyl chloride (0.08 μg/L), as part of the 2004 Draft HRL Rule Revision.
- In April 2007, the MDH withdrew the proposed draft revised HRL for vinyl chloride.
- In September 2007, the MDH recommended that the HRL for vinyl chloride be included on the list of compounds to be reviewed as part of the Draft HRL Rule Revision.
- In February 2008, MDH completed their review of the HRL for vinyl chloride and proposed that the HRL remain at 0.2 μg/L (no change).
- In July 2008, MDH posted a draft of the Proposed HRL Rule Revision and Statement of Need and Reasonableness (SONAR), a technical document explaining and supporting the revised Rules.
- In September 2008, a copy of the July 2008 Proposed HRL Rule Revision was published in the State Register.
- In October 2008, a public hearing on the July 2008 Proposed HRL Rule Revision was held before an Administrative Law Judge. The hearing was followed by a 20-day comment period (ending October 30, 2008) and a five-day rebuttal period (ending November 6, 2008).
- In April 2009, the July 2008 Proposed HRL Rule Revision was adopted (Minnesota Administrative Rules Parts 4717.7810 through 4717.7900).
- The 2009 HRL for vinyl chloride was established as 0.2 μg/L (no change).

Specific information regarding the MDH HRL Rule Revision can be obtained by contacting the MDH or by visiting the MDH website: http://www.health.state.mn.us/divs/eh/risk/guidance/gw/index.html

4.3.5.3 Status of Bottled Water Delivery

As a voluntary interim precautionary measure, Whirlpool and Reynolds originally began providing bottled water to homes where vinyl chloride was detected at concentrations above the proposed

draft HRL (0.08 μg/L). Whirlpool and Reynolds began providing bottled water to 12 West Shore Road and 13 West Shore Road in March 2005. Whirlpool and Reynolds began providing bottled water to 2 Hummingbird Hill and 15 West Shore Road in May 2005 and November 2007, respectively.

In a letter to MPCA dated August 23, 2007, CRA stated:

> *"…Whirlpool and Reynolds will also, for the immediate future, continue to provide bottled water to homes where vinyl chloride is detected above a concentration of 0.08 μg/L. Even after an amended MDD is issued, Whirlpool and Reynolds will continue to provide bottled water to those homes until the current HRL rulemaking is concluded and either the current HRL for vinyl chloride is confirmed or a new one is adopted."*

As discussed in Section 4.2.5.1, the proposed HRL of 0.08 μg/L was withdrawn in April 2007. The current HRL for vinyl chloride (0.2 μg/L) was confirmed in February 2008 and adopted into rule in April 2009.

Bottled water delivery to 12 West Shore Road, 13 West Shore Road and 2 Hummingbird Hill was discontinued following installation of new/deeper replacement wells at these locations (see Section 4.3.5.2).

Bottled water delivery to 15 West Shore Road has been discontinued, as vinyl chloride concentrations at this location remain at or below the current HRL (0.2 μg/L) and no well advisory has been issued.

Bottled water has not been provided to 50 East Oaks Road, 3 Heron Lane, 1 Hummingbird Hill, 10 West Shore Road, or 11 West Shore Road because vinyl chloride was first detected at these locations after the current HRL (0.2 μg/L) was adopted into rule. Vinyl chloride concentrations at these locations have since been non-detect or remain below the current HRL.

Whirlpool and Reynolds began providing bottled water to 2 Heron Lane on November 16, 2012 as a precautionary, interim measure based on the October 2012 detection of vinyl chloride above the current HRL. Bottled water delivery to 2 Heron Lane was discontinued, following installation of the new/deeper replacement well (see Section 4.3.5.2).

5. Gas Probe Monitoring

5.1 On-Site Gas Monitoring

Historical results from the gas probe monitoring program indicate the presence of measurable levels of combustible gas within the buried waste of the reconsolidated North Disposal Area. Table 5.1 presents the results of gas probe monitoring conducted using an MSA combustible gas meter from 1995 through 2001. Typical readings for other landfill sites have ranged from 0.5 to 65 percent combustible gas. As shown in Table 5.1, readings from the Highway 96 Site range from 0 to 93 percent combustible gas. This is likely an indication that all combustible gas may not be landfill related and may also be attributed in part to the wetlands (swamp) setting.

Per MPCA approval, combustible gas monitoring with an MSA meter was discontinued in 2001 and a LandTec GEM 500 portable gas meter has been used to perform combustible gas monitoring

since 1999. Table 5.2 presents the historical results of gas probe monitoring using the LandTec GEM 500. The LandTec meter reads the percentage by volume of methane (CH_4), oxygen (O_2), and carbon dioxide (CO_2). Typical concentrations of these parameters recorded at other landfills sites are: CH_4 (30 to 60%), CO_2 (20 to 50%), and O_2 (<2%). The results on Table 5.2 are generally within or below the typical concentrations.

In accordance with the O&M Plan (Ref. 8) and MPCA-approved modifications in 2001, gas probe monitoring was conducted on a semi-annual basis through 2014. Discontinuation of gas probe monitoring (beginning in 2015) was discussed with MPCA on December 10, 2013 and recommended in the 2014 Annual Monitoring Report (CRA, March 2015). On April 13, 2015, the MPCA requested that gas probe monitoring be conducted on an annual basis through 2018, prior to discontinuation of monitoring.

The 2015 annual gas probe monitoring event was performed during the third quarter of 2015, to coincide with the annual soil cap inspection (see Section 6). During the third quarter of 2015, the six gas probe locations shown on Figure 5.1 were monitored for combustible gas using a LandTec GEM 500. Each gas probe was also monitored for positive pressure using the Land Tec meter (accurate to 0.1 inch of H_2O). The 2015 gas probe monitoring results are presented on Table 5.2.

Figures 5.2 through 5.7 show the percent combustible gas vs. time graphs for GP1 through GP6, respectively. Since combustible gas monitoring began at the Site, no clear Site-wide trend has emerged.

Pressure readings typically range between 0.0 inch of H_2O and 0.2 inches of H_2O at all locations. The lack of appreciable pressure observed at the gas probes indicates that the passive gas venting system is relieving any potential pressure build-up from combustible gas generation. Off-cap monitoring should be conducted in areas of future development prior to any construction.

5.2 MEH Gas Monitoring

MEH commenced construction activities for the Weston Woods townhome development at the Site during the spring of 2001. MEH installed 10 gas probes, and two gas interceptor trenches to prevent lateral gas migration. In July 2005, MEH installed six passive gas vents on the landfill cap in order to augment the passive gas remedy. The location of the gas probes, gas vents, and gas interceptor trench are illustrated in Figure 5.8. MEH conducted routine gas monitoring under MPCA's Voluntary Investigation and Clean-up (VIC) program to evaluate the potential of lateral gas migration. MEH's gas monitoring data and migration evaluation are not included in this report.

In a letter dated January 25, 2010, the MPCA provided approval for MEH to discontinue landfill gas monitoring because methane no longer exceeded 25% of the lower explosive limit (LEL) at the landfill perimeter. The MPCA requested that MEH monitoring probes remain available for future potential monitoring until at least 2014. The MPCA also requested that:

- MEH shall not disturb the methane gas interceptor trenches.
- Any MEH construction of new buildings, particularly those slated to be built on or near the South Disposal Area must follow the MPCA-approved Site Construction Contingency Plan (SCCP), dated May 2001, and the MPCA-approved modifications to the SCCP dated July 20, 2001.

- MEH must comply with the MPCA Consent Order for the Superfund Site, dated January 9, 1995 and the two Amendments to the Consent Order dated December 16, 1999 and May 29, 2001 respectively.
- MEH shall provide residents of the development with updates on environmental issues at the Site on a regular basis (i.e., at least annually).
- MEH shall provide prospective buyers with information about the Site prior to purchase.
- MEH shall develop a plan for funding and implementing the long-term maintenance of the sump basket venting systems in each townhome near the CWA

Compliance with the above-referenced requirements is regulated under the MPCA's VIC Program (Site ID# VP14310).

5.3 Soil Gas Evaluation

In 2012, a preliminary soil gas evaluation was completed during the second and third gas probe monitoring events, as proposed in CRA's email to MPCA dated June 19, 2012 and approved by MPCA on June 25, 2012.

The objective of the preliminary soil gas sampling was to identify whether areas in the CWA had high concentration of VOCs, specifically vinyl chloride, in soil gas within the vadose zone above the perched groundwater unit. The data collected from the preliminary study would be used to evaluate whether low cost supplemental remediation methods (e.g., retrofitting gas vents with solar powered blowers) would reduce the overall time frame associated with Site remediation (i.e. operation of the groundwater extraction system).

During the two soil gas screening events, all of the gas probes had at least one photo ionization detector (PID) reading greater than 1 ppm, except gas probe GP3. The maximum PID reading was 14.4 ppm (GP5). However, vinyl chloride was not detected by colorimetric detector tubes at any of the gas probe locations.

Based on the lack of detectible vinyl chloride in the gas probes, no further soil gas evaluation will be conducted at this time. As documented in a letter dated June 12, 2013, the MPCA Superfund program staff consulted with the MPCA Closed Landfill program staff and determined that no additional gas venting is necessary at the Site.

6. Soil Cap Inspections

In accordance with the O&M Plan (Ref. 8) and MPCA-approved modifications on July 19, 2001, soil cap inspections were conducted on a semi-annual basis through 2014. Beginning in 2015, the frequency of soil cap inspections was reduced from semi-annually to annually, as recommended in the 2014 Annual Monitoring Report (CRA, March 2015) and approved by the MPCA on April 23, 2015.

The 2015 annual soil cap inspection was performed during the third quarter of 2015. The following items were evaluated during the inspections:

- The soil cover was inspected for detrimental erosion, settlement and stressed or overgrown vegetation

- Access roads were inspected for physical damage and obstructions
- Gas monitoring probes and groundwater monitoring wells were inspected for physical damage

A record of each inspection is maintained on a checklist. To date, the cover has shown no signs of detrimental erosion or stressed vegetation. Minor settlement has been detected and repaired by placing fill. The cap vegetation is well established. Gas probes and monitoring wells are in good condition.

7. Conclusions

Based on the information presented in this 2015 Annual Monitoring Report, the following conclusions are made:

1. The groundwater extraction system is effectively capturing VOCs from the CWA based on the evaluation of hydraulic conditions (i.e., groundwater elevation contours) and groundwater chemistry (i.e., analytical results at downgradient compliance wells are below SCGs).
2. The observed maximum aquifer drawdown resulting from operation of the SPRWS supply wells under a worst-case pumping scenario would not impact the water quality or operation of private wells in North Oaks.
3. Groundwater samples from monitoring wells continue to indicate that vinyl chloride is not present in wells screened in the unconsolidated Glacial Drift aquifer (Lower Sand aquifer) in North Oaks.
4. Groundwater samples from monitoring wells continue to indicate that vinyl chloride detections in wells west of Gilfillan Lake, in the St. Peter Sandstone aquifer, are of limited extent.
5. Groundwater samples from monitoring wells continue to indicate that vinyl chloride is not present in wells screened in the Prairie du Chien aquifer in North Oaks.
6. Ongoing residential well sampling of homes in North Oaks, west of Gilfillan Lake (Operable Unit 4), confirms that the number of residential wells that have ever had detectable concentrations of vinyl chloride is limited to ten locations near the west shore of Gilfillan Lake: 50 East Oaks Road, 2 Heron Lane, 3 Heron Lane, 1 Hummingbird Hill 2 Hummingbird Hill, 10 West Shore Road, 11 West Shore Road, 12 West Shore Road, 13 West Shore Road, and 15 West Shore Road. Four of the ten wells (2 Heron Lane, 2 Hummingbird Hill, 12 West Shore Road, and 13 West Shore Road) have been replaced with new/deeper residential wells (see Section 4.3.5.2). Vinyl chloride concentrations at the remaining six wells (3 Heron Lane, 1 Hummingbird Hill, 50 East Oaks Road, 10 West Shore Road, 11 West Shore Road, and 15 West Shore Road) have since been non-detect or remain at or below the vinyl chloride HRL (0.2 μg/L).

8. Recommendations

Based on the information presented in this 2015 Annual Monitoring Report, GHD recommends the following:

1. Operation of the on-Site groundwater extraction system should continue in the perched groundwater system (via the dewatering sump) and in the Lower Sand/St. Peter Sandstone aquifers (via extraction wells EW1B and EW2).

2. Annual assessment of SPRWS activities should be discontinued (see Section 3.5 and Section 7).

3. Annual groundwater sampling of on-Site and off-Site monitoring well locations should continue.

4. Residential well sampling should continue, in accordance with the long-term monitoring program outlined in Alternative A2 of CRA's Feasibility Study Report (Ref. 15) (approved by MPCA on November 7, 2007) and subsequent MPCA-approved modifications. Future residential well sampling will be based on MPCA requirements and approved modifications.

5. The supplemental sampling of three residential wells outside the long-term monitoring program, west of 2 Heron Lane (1 Heron Lane, 3 Heron Lane, and 5 Heron Lane) should continue for two additional rounds (in the spring of 2016 and spring of 2018, as requested by the MPCA on April 13, 2015), prior to discontinuing sampling at these locations (as recommended in the 2014 Annual Monitoring Report [CRA, March 2015]).

6. New residential wells in the Prairie du Chien aquifer should be provided to homes in Operable Unit 4 that have been issued a well advisory due to Site-related VOCs[4], as stipulated in the MDD amendment for the Highway 96 Site (dated August 26, 2008).

7. Gas probe monitoring should be conducted on an annual basis through 2018 and coincide with annual soil cap inspections (as requested by the MPCA on April 13, 2015), prior to discontinuation of monitoring (as recommended in the 2014 Annual Monitoring Report [CRA, March 2015]).

8. Soil cap inspections should be conducted on an annual basis (as recommended in the 2014 Annual Monitoring Report [CRA, March 2015] and approved by the MPCA on April 13, 2015). Cap maintenance should continue as needed, for the duration of operation of the groundwater extraction system (see Section 6.0).

9. References

1 Conestoga-Rovers & Associates. March 1988. Remedial Investigation/Interim Response Action Plan.

2 Conestoga-Rovers & Associates. October 1988. Alternatives Analysis Report.

3 Conestoga-Rovers & Associates. April 1989. Detailed Analysis Report.

4 Conestoga-Rovers & Associates. October 1993. North Oaks - Southeast Area Groundwater Investigation.

5 Conestoga-Rovers & Associates. January 1994. Response Action Plan.

6 Conestoga-Rovers & Associates. May 1994. Phase II Response Action Plan.

[4] As identified on Table 1 of MPCA's MDD Amendment dated August 26, 2008 (1,1,2-trichloroethene (TCE), vinyl chloride, trans-1,2-dichloroethene, 1,1-dichloroethane, benzene, toluene, and methyl ethyl ketone).

7 Conestoga-Rovers & Associates. January 1994. South Disposal Area Groundwater Investigation.

8 Conestoga-Rovers & Associates. May 1994. Post Closure Operation and Maintenance Plan.

9 Conestoga-Rovers & Associates. January 1995. Remedial Action Final Report.

10 Conestoga-Rovers & Associates. June 2005. Groundwater and Residential Well Evaluation Report - North Oaks, Minnesota.

11 Conestoga-Rovers & Associates. February 2006. Groundwater and Residential Well Evaluation Report - North Oaks, Minnesota (June 2005 - January 2006).

12 Conestoga-Rovers & Associates. February 2007. Groundwater and Residential Well Evaluation Report - North Oaks, Minnesota (February 2006 - January 2007).

13 Conestoga-Rovers & Associates. May 2007. Subsurface Geophysical Survey Report.

14 Conestoga-Rovers & Associates. December 2008. Completion Report - Monitoring Well Installation (MW-19A/MW-21A)

15 Conestoga-Rovers & Associates. July 2007. Feasibility Study - VOCs in Groundwater - West of Gilfillan Lake - North Oaks, Minnesota.

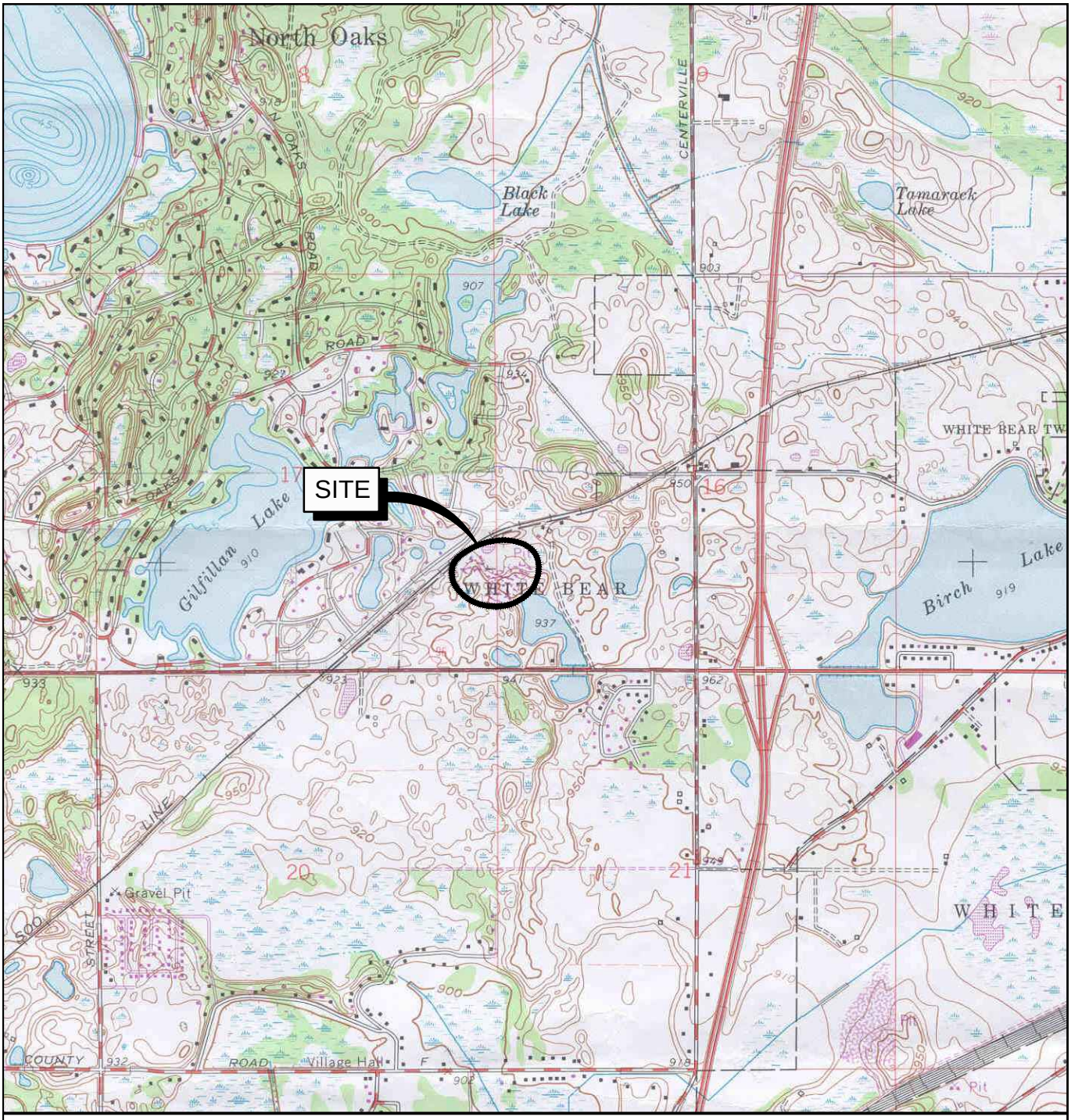
16 Meyer, G.N. 1985. Quaternary Geologic Map of the Minneapolis-St. Paul Urban Area, Minnesota. Minnesota Geological Survey, Miscellaneous Map Series M-54, and Scale 1:48,000.

17 Norvitch, R.F., Ross, T.G., and Brietkrietz, A. 1973. Water Resources Outlook for the Minneapolis-St. Paul Metropolitan Area, Minnesota.

18 Conestoga-Rovers & Associates. February 2010. Work Plan - Extraction Well Replacement.

19 Conestoga-Rovers & Associates. July 2010. Installation and Operation Report - Extraction Well EW1B.

Figures



SOURCE: USGS 7.5 MINUTE QUAD
WHITE BEAR LAKE WEST, MINN.

N

0 1000 2000ft

figure 1.1

SITE LOCATION
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA006 FEB 1, 2016

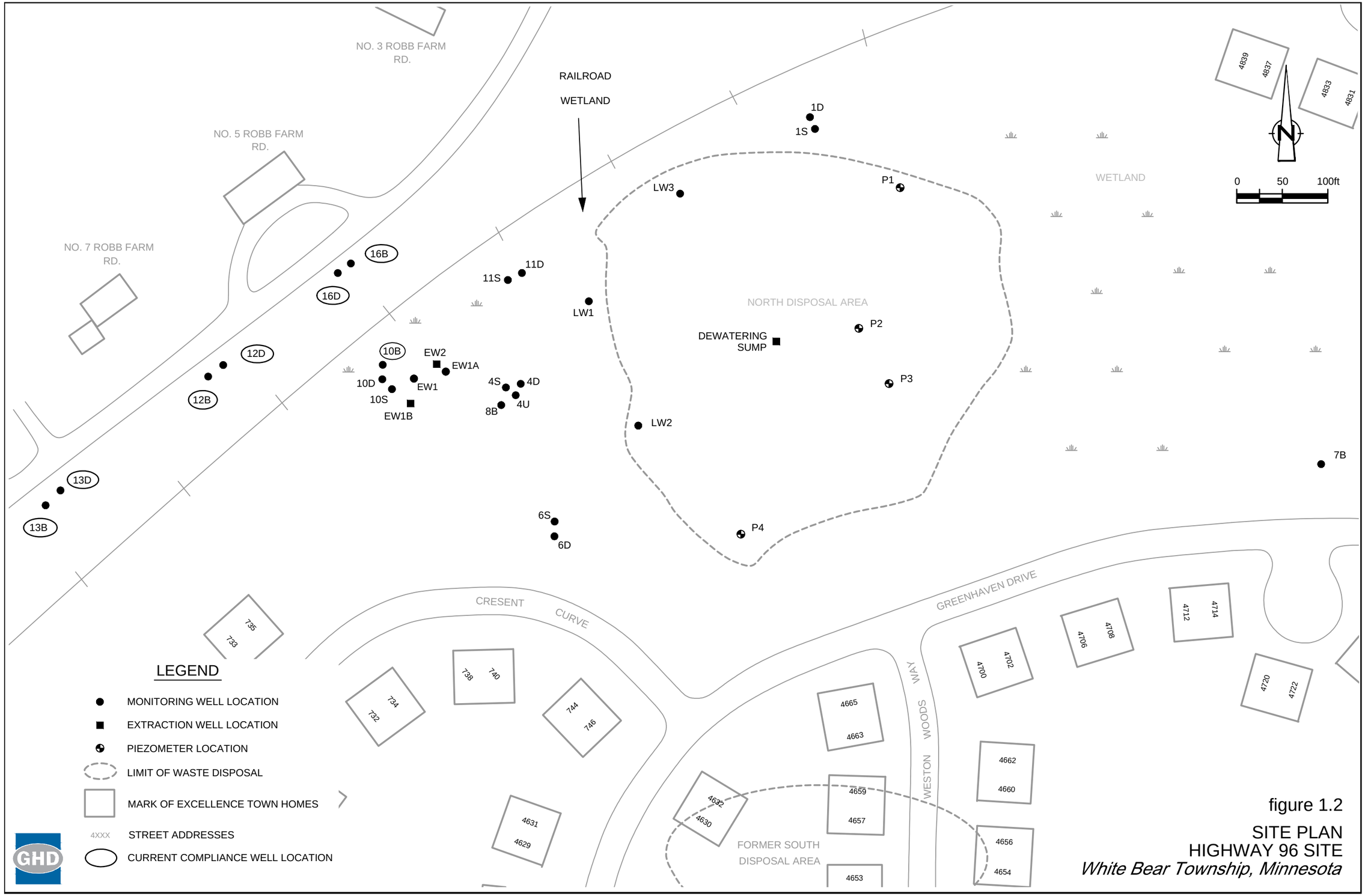


figure 1.2

SITE PLAN
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA010 FEB 1, 2016

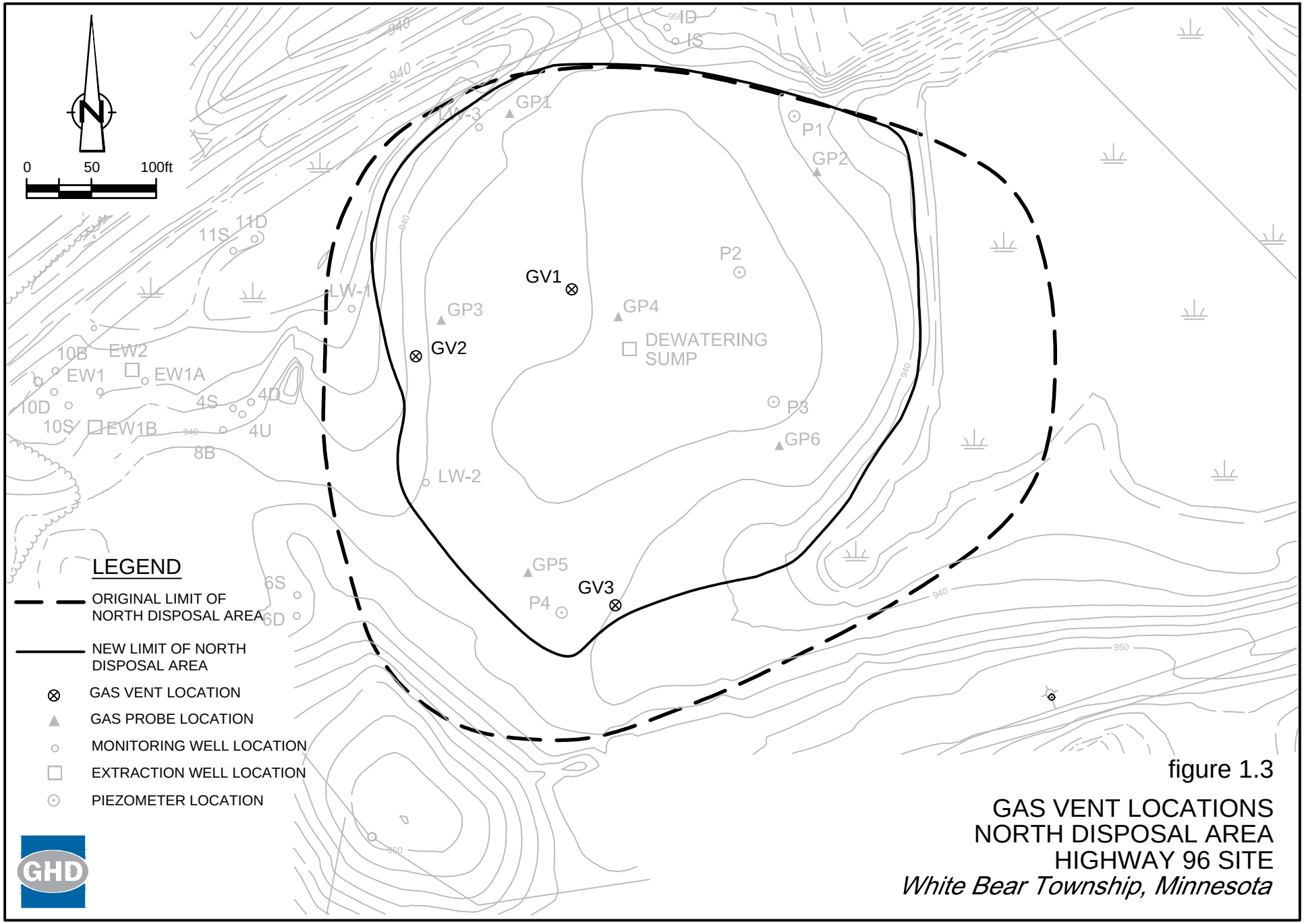


figure 1.3

GAS VENT LOCATIONS
NORTH DISPOSAL AREA
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA011 FEB 1, 2016

AREA 2

AREA 4

AREA 1

AREA 3

AREA 5

MW21A
MW19L
MW19A
EW3
MW19B
MW20B
MW18A
MW18B
MW18L
MW17L
MW17B
MW17A

GILFILLAN LAKE

0 200 600ft

LEGEND

- GEOGRAPHIC AREAS
- TEST EXTRACTION WELL LOCATION
- MONITORING WELL LOCATION
- CONNECTED TO MUNICIPAL WATER SUPPLY
- * CONVERTED RESIDENTIAL MONITORING WELL LOCATION

figure 1.4

OFF-SITE GROUNDWATER MONITORING NETWORK
HIGHWAY 96 SITE
White Bear Township, Minnesota

GHD

02012-00(066)GN-WA012 FEB 1, 2016

NOTE: FIGURE TAKEN FROM "REMEDIAL ACTION FINAL REPORT" CRA (1996)

figure 1.5

MUNICIPAL WATER SYSTEM
HIGHWAY 96 SITE
White Bear Township, Minnesota

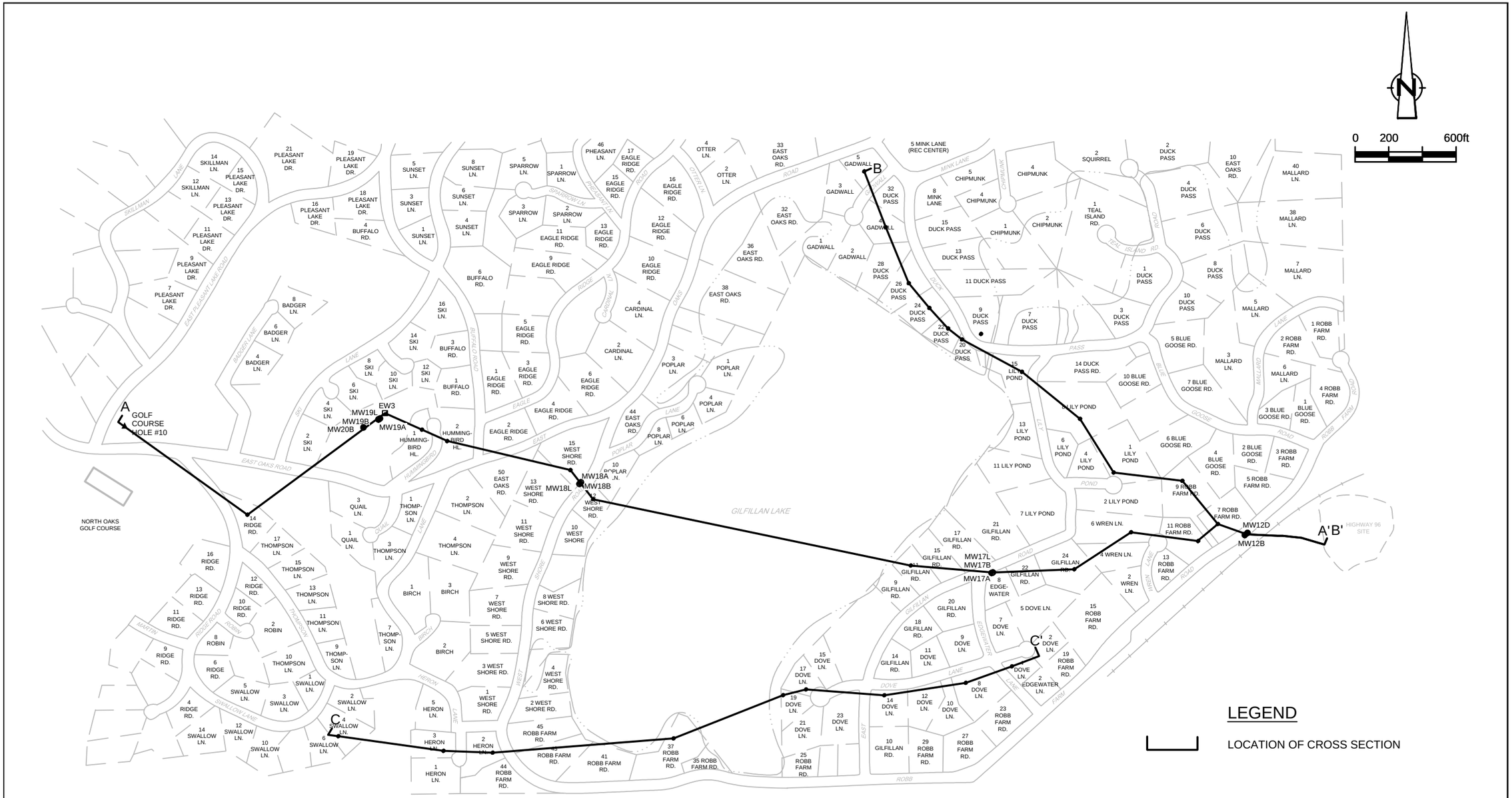


figure 3.1

LOCATION OF CROSS SECTIONS
HIGHWAY 96 SITE
White Bear Township, Minnesota

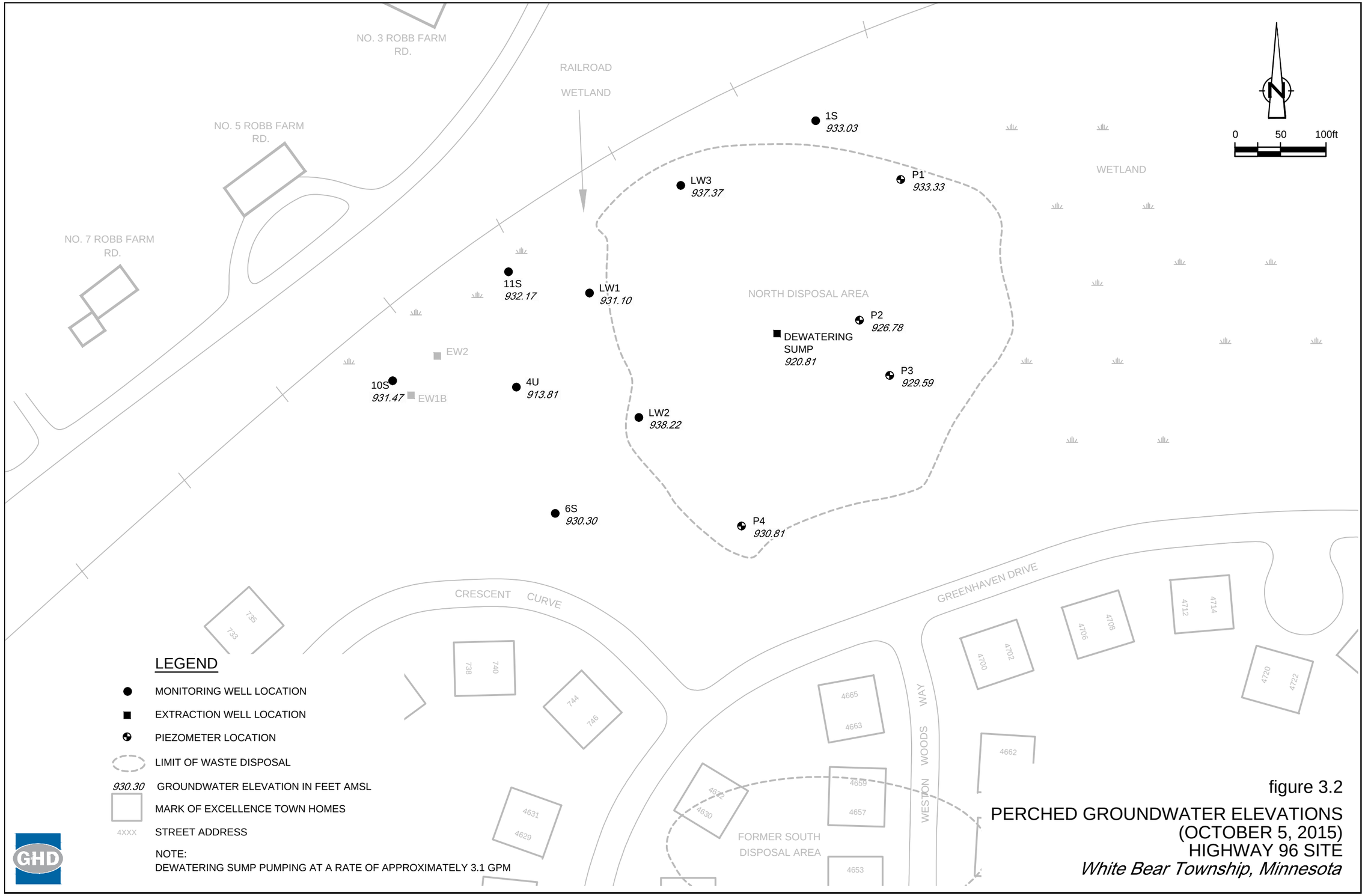
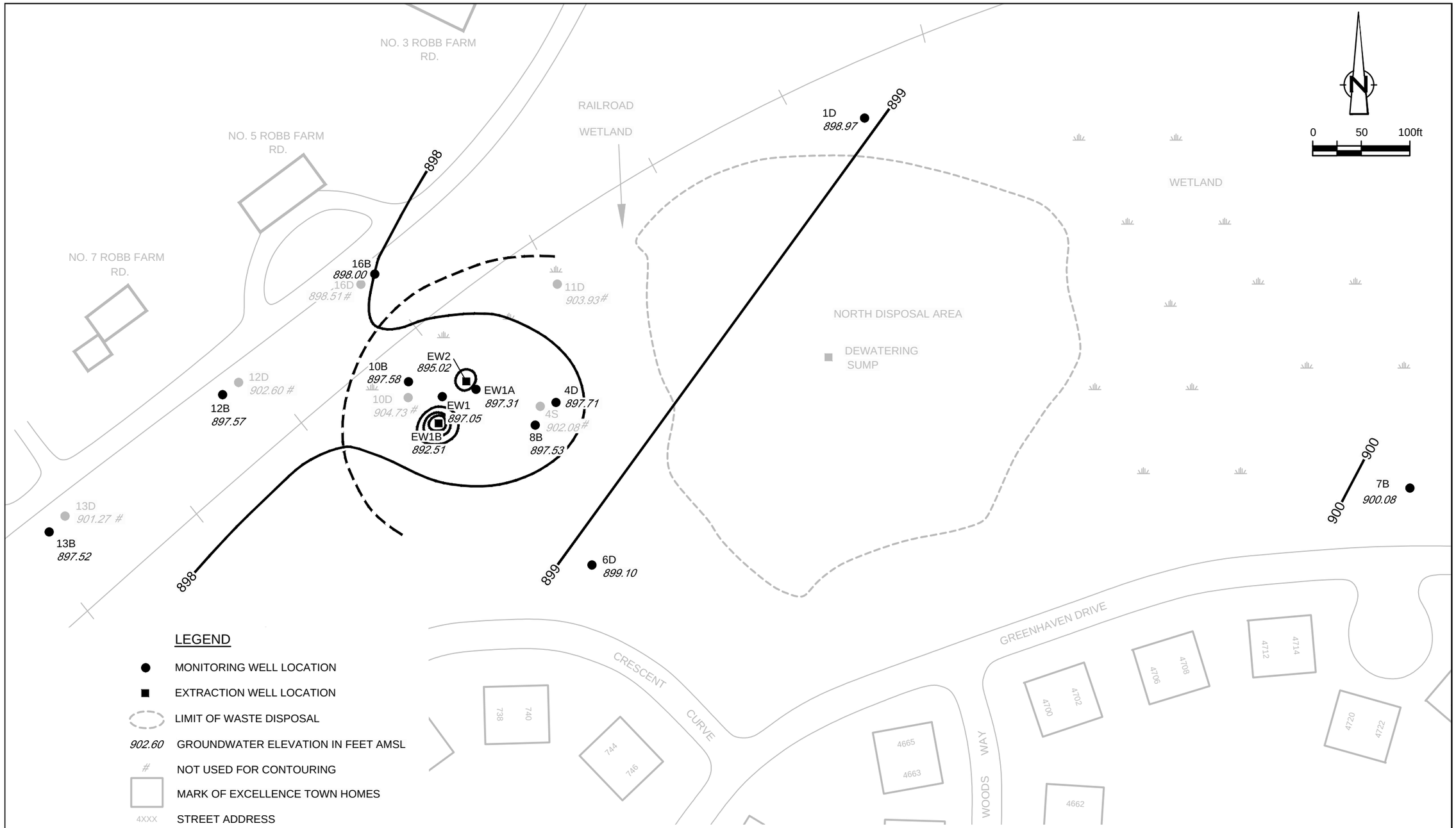


figure 3.2

PERCHED GROUNDWATER ELEVATIONS
(OCTOBER 5, 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota



LEGEND

- MONITORING WELL LOCATION
- EXTRACTION WELL LOCATION
- LIMIT OF WASTE DISPOSAL
- *902.60* GROUNDWATER ELEVATION IN FEET AMSL
- # NOT USED FOR CONTOURING
- MARK OF EXCELLENCE TOWN HOMES
- 4XXX STREET ADDRESS
- 899 GROUNDWATER CONTOUR
- APPROXIMATE LIMIT OF CAPTURE (BASED ON ANNUAL AVERAGE COMBINED PUMPING RATE)

NOTE:
-EW1B PUMPING AT A RATE OF APPROXIMATELY 10.1 GPM
-EW2 PUMPING AT A RATE OF APPROXIMATELY 10.1 GPM
-AVERAGE ANNUAL COMBINED PUMPING RATE (EW1B + EW2) FOR 2015 WAS 19.6 GPM

figure 3.3

LOWER SAND/ST. PETER SANDSTONE AQUIFER
GROUNDWATER ELEVATIONS (OCTOBER 5, 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA002 FEB 8, 2016

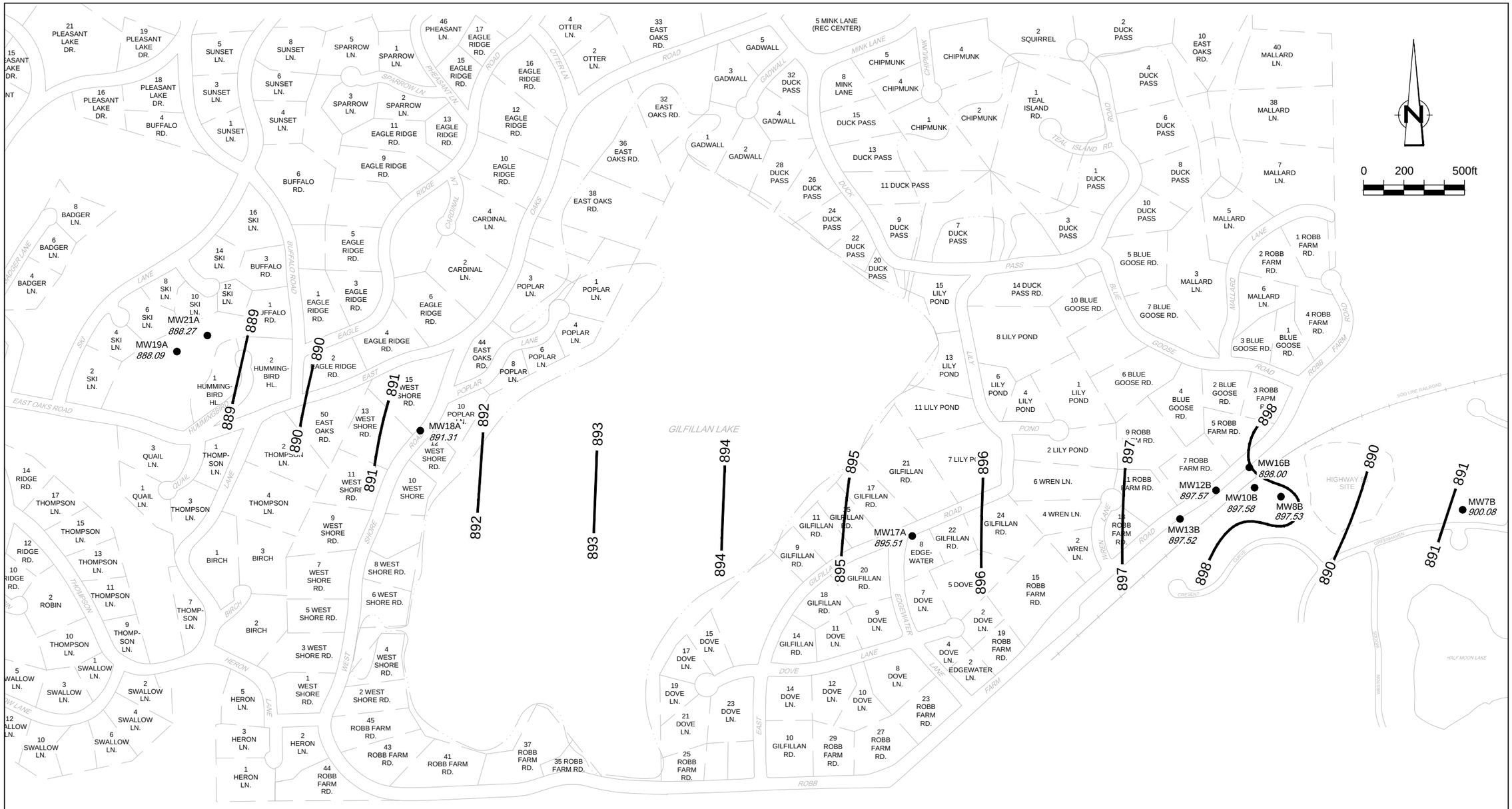


figure 3.4

UPPER ST. PETER SANDSTONE AQUIFER GROUNDWATER ELEVATIONS (OCTOBER 5, 2015) HIGHWAY 96 SITE

White Bear Township, Minnesota

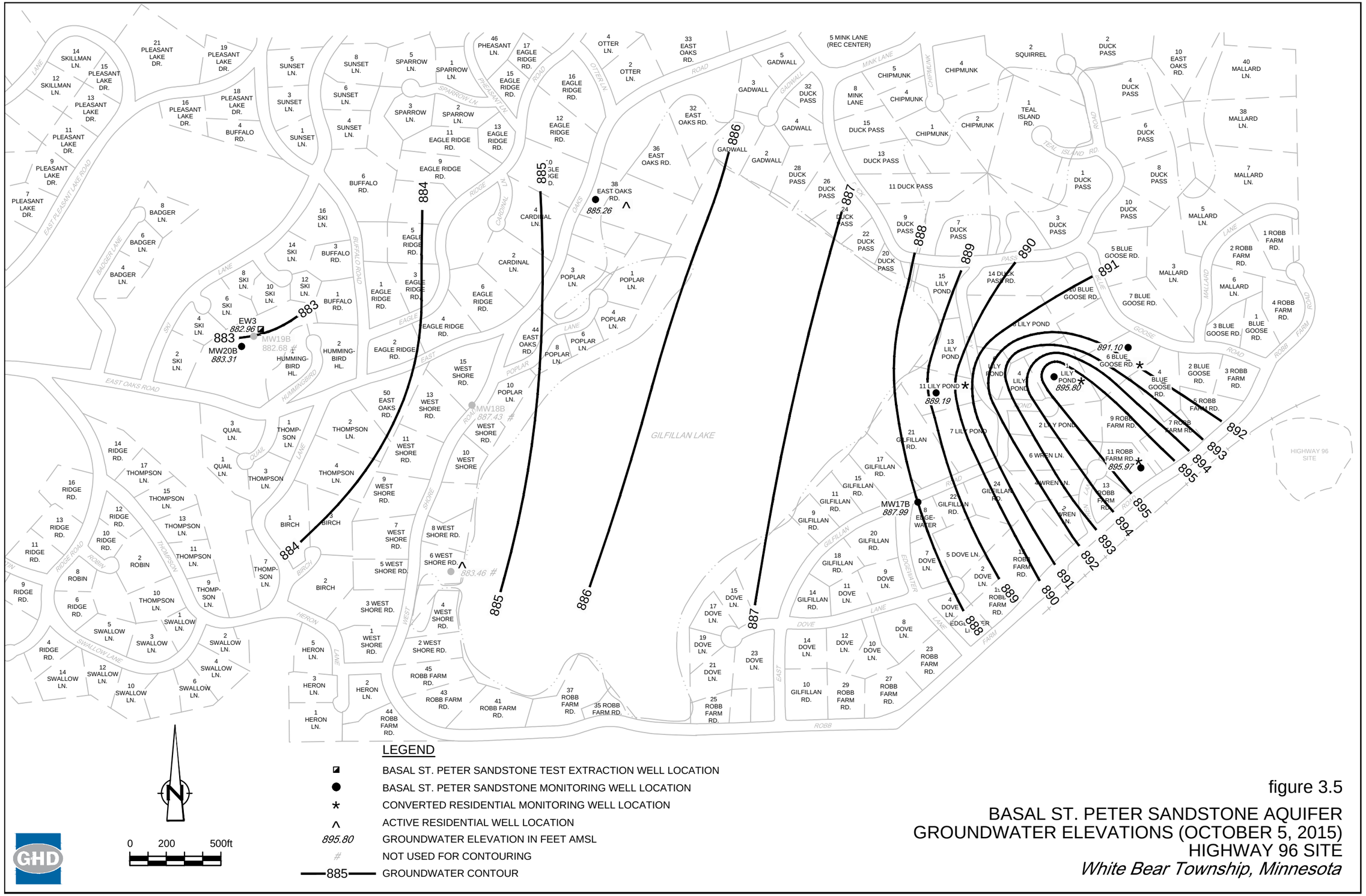
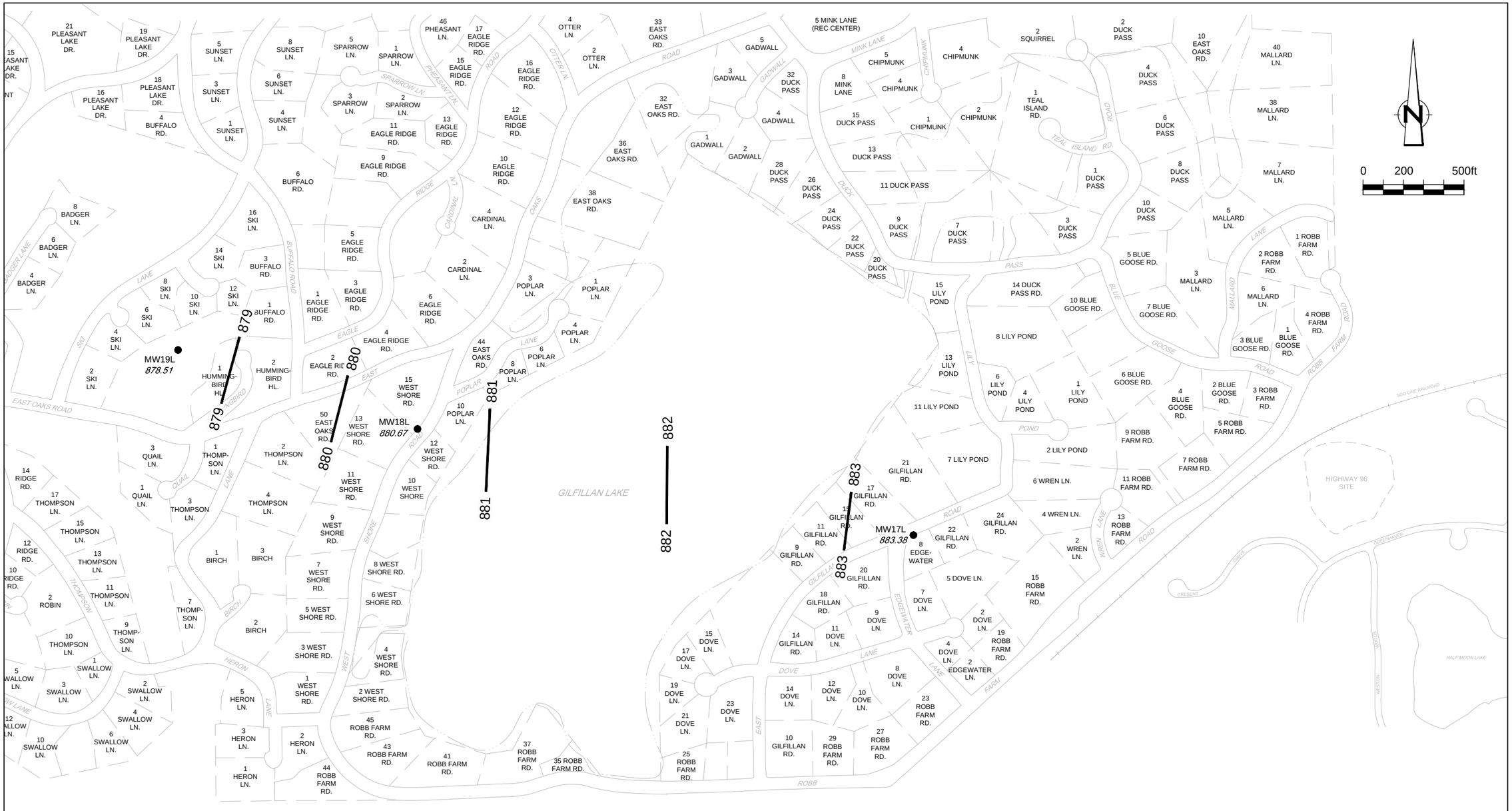


figure 3.5

BASAL ST. PETER SANDSTONE AQUIFER
GROUNDWATER ELEVATIONS (OCTOBER 5, 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA004 FEB 8, 2016



LEGEND

- ● PRAIRIE DU CHIEN MONITORING WELL LOCATION
- *878.51* GROUNDWATER ELEVATION IN FEET AMSL
- 882 GROUNDWATER CONTOUR

figure 3.6

PRAIRIE DU CHIEN AQUIFER
GROUNDWATER ELEVATIONS (OCTOBER 5, 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

GHD

02012-00(066)GN-WA005 NOV 6/2015

Figure 3.7

Historical TVOC Mass Removal
Highway 96 Site
White Bear Township, Minnesota

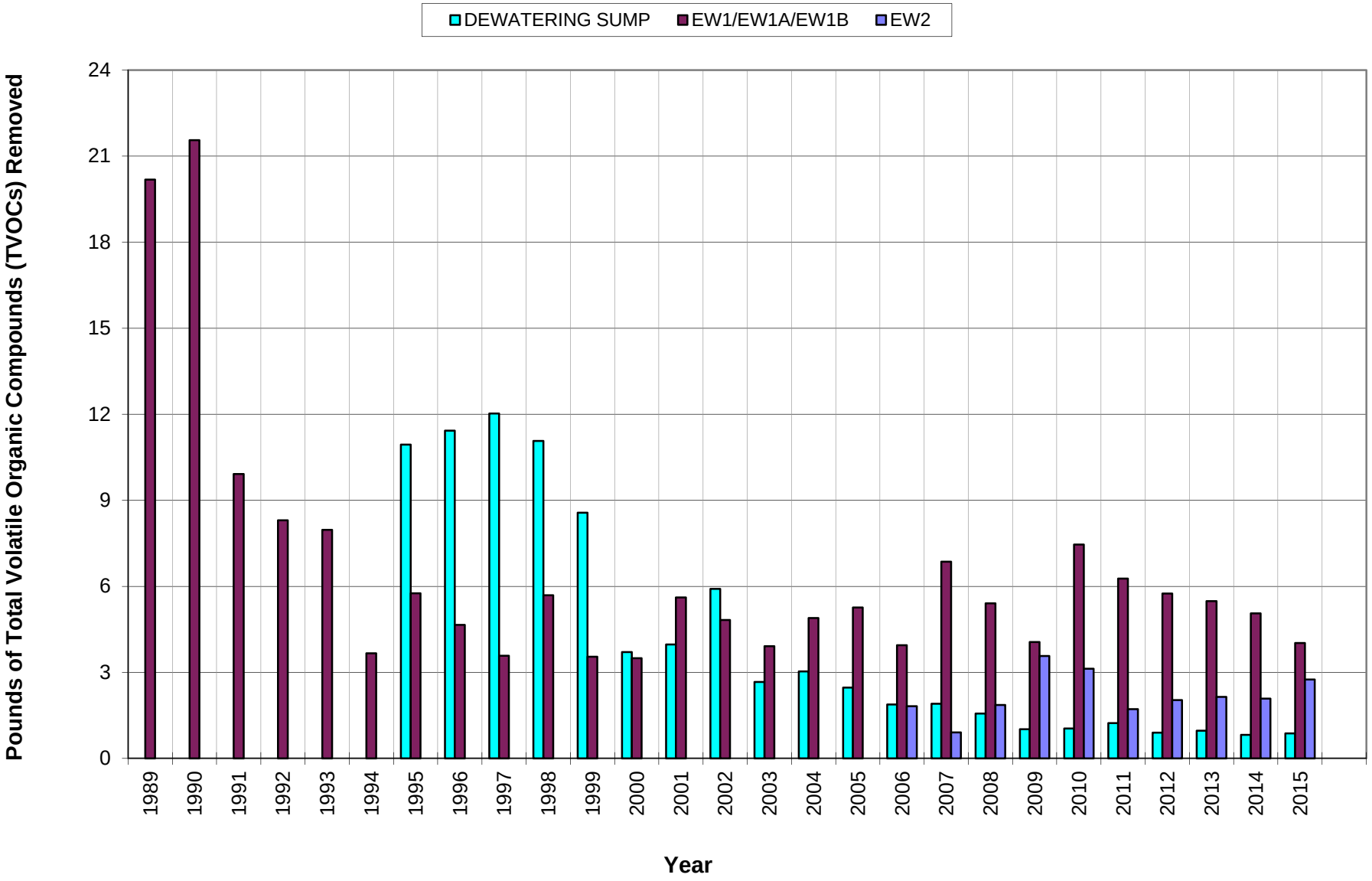


Figure 3.8

Historical TVOC Mass Removal Efficiency
Highway 96 Site
White Bear Township, Minnesota

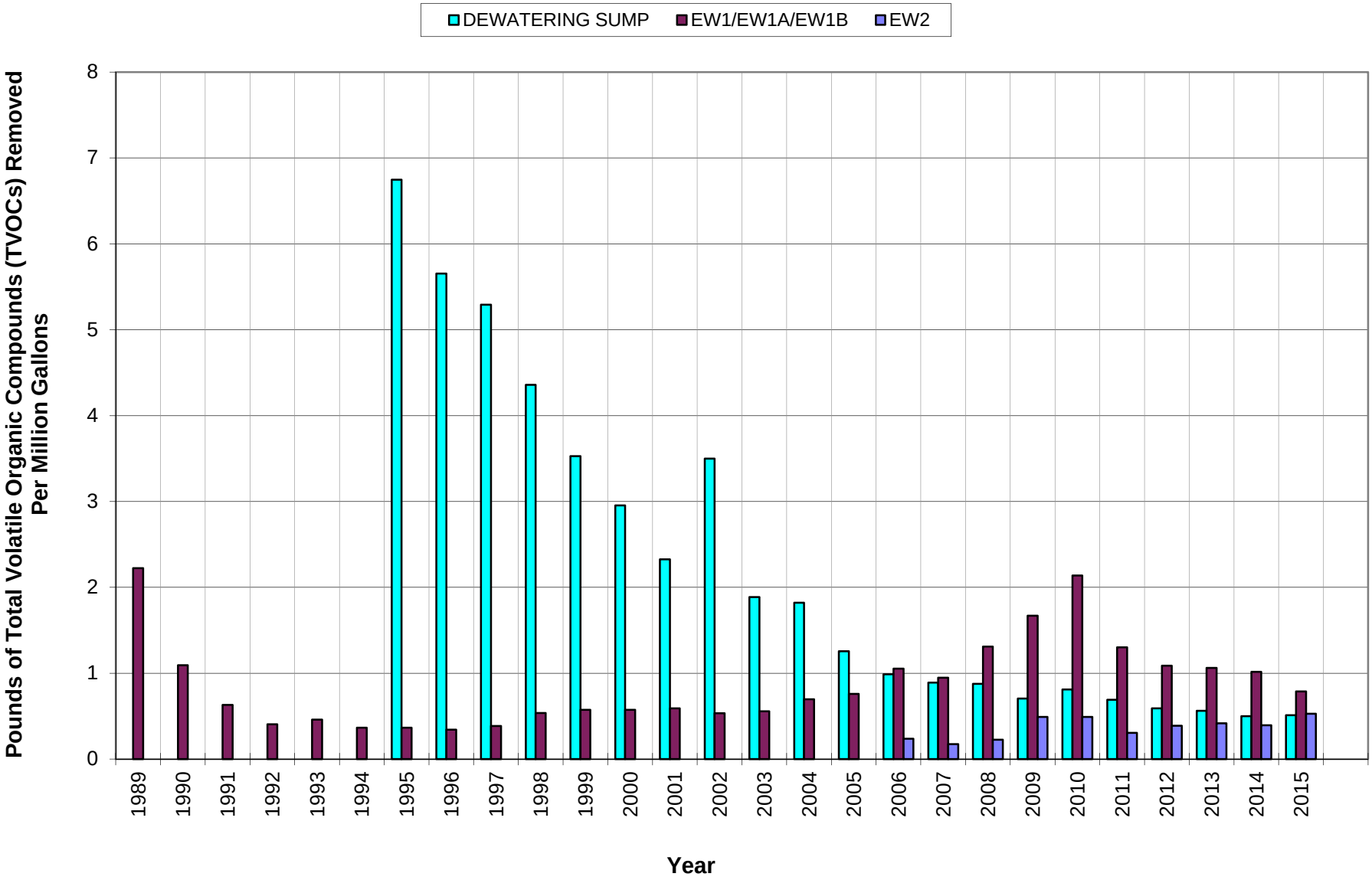


Figure 3.9

Cumulative TVOC Mass Removal
Highway 96 Site
White Bear Township, Minnesota

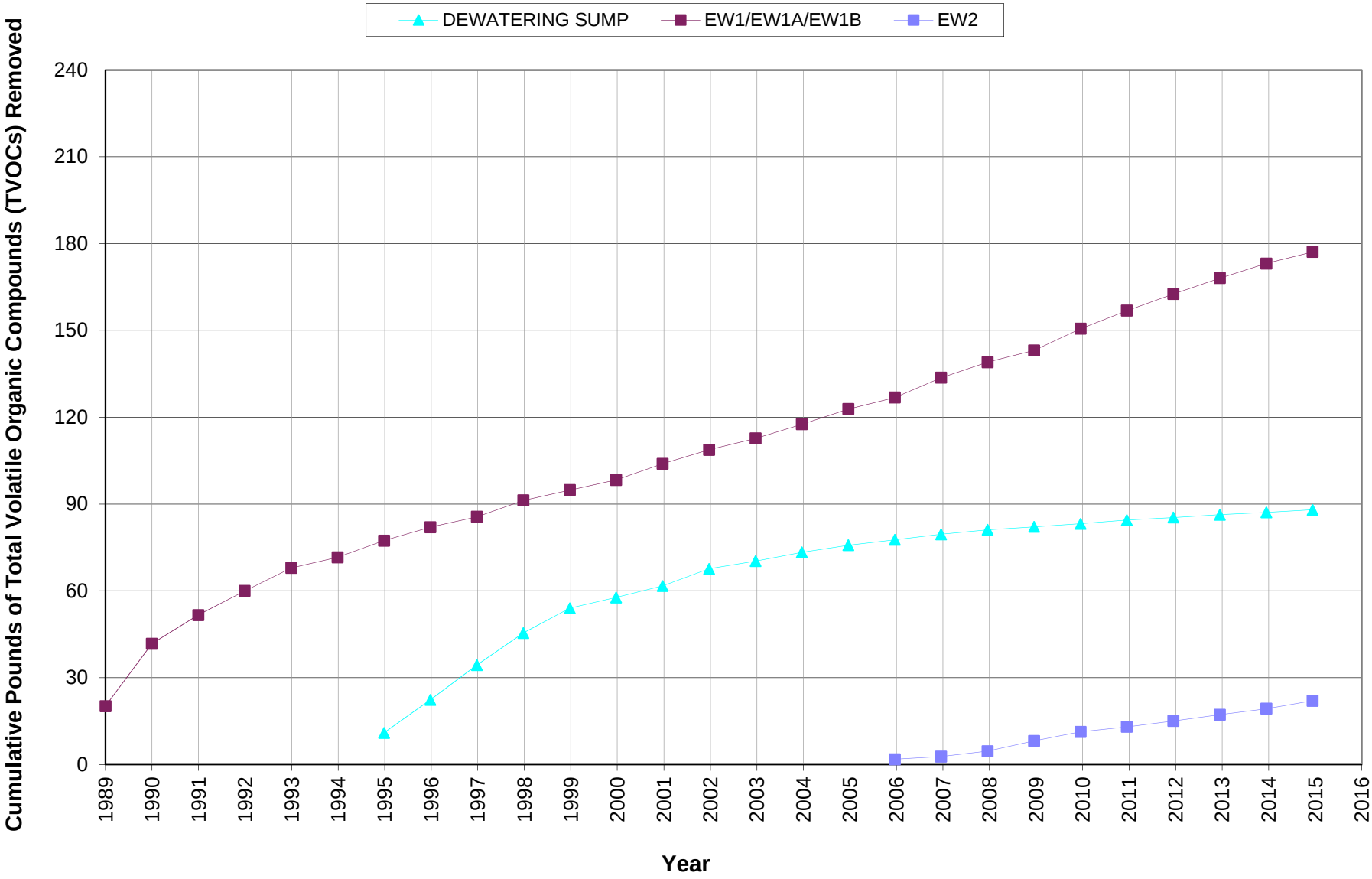
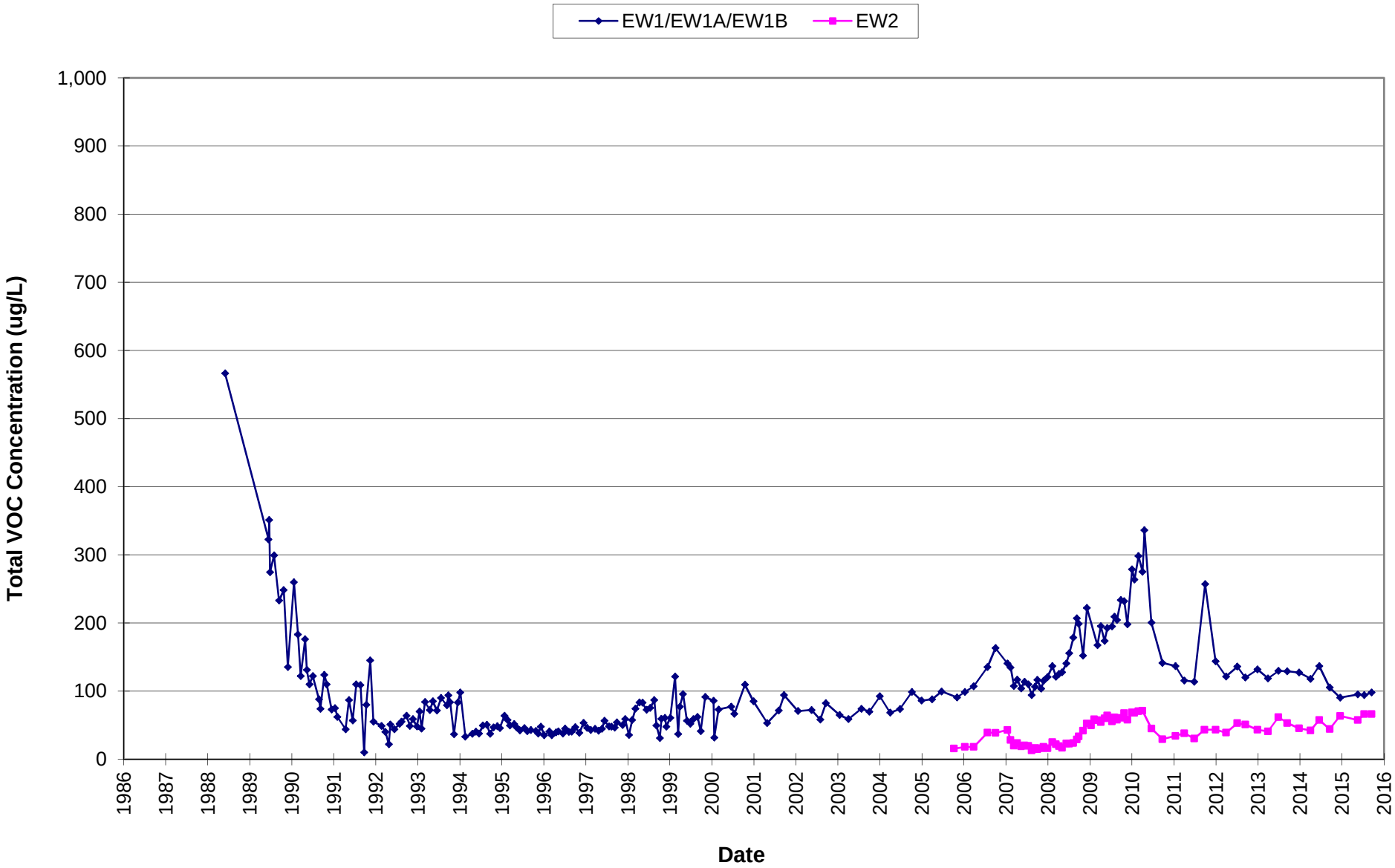


Figure 3.10

Total VOC Concentrations
EW1/EW1A/EW1B and EW2
Highway 96 Site
White Bear Township, Minnesota



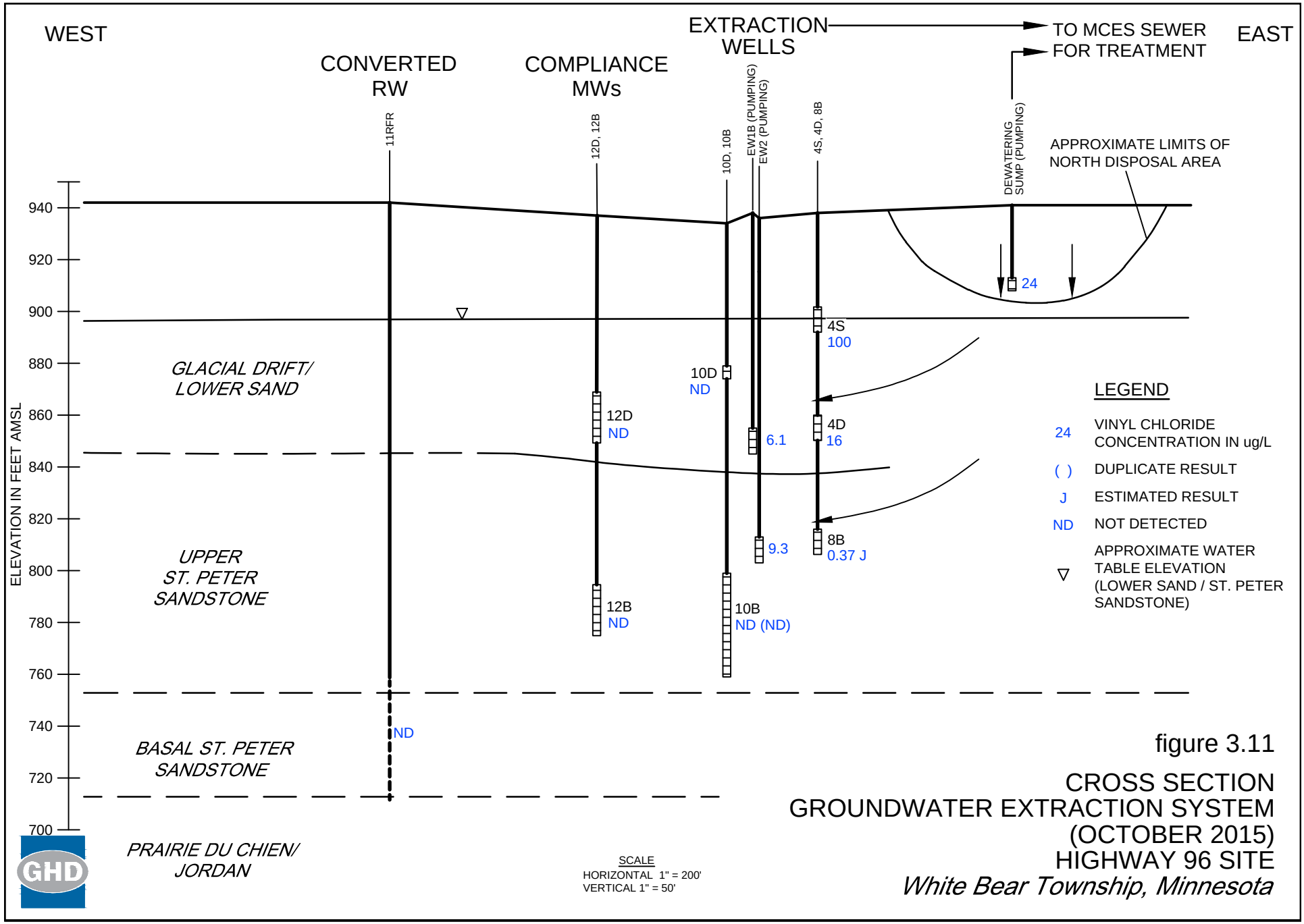


figure 3.11

CROSS SECTION GROUNDWATER EXTRACTION SYSTEM (OCTOBER 2015) HIGHWAY 96 SITE

White Bear Township, Minnesota

02012-00(066)GN-WA007 FEB 8, 2016

Figure 4.1

Total VOC Concentrations
LW3
Highway 96 Site
White Bear Township, Minnesota

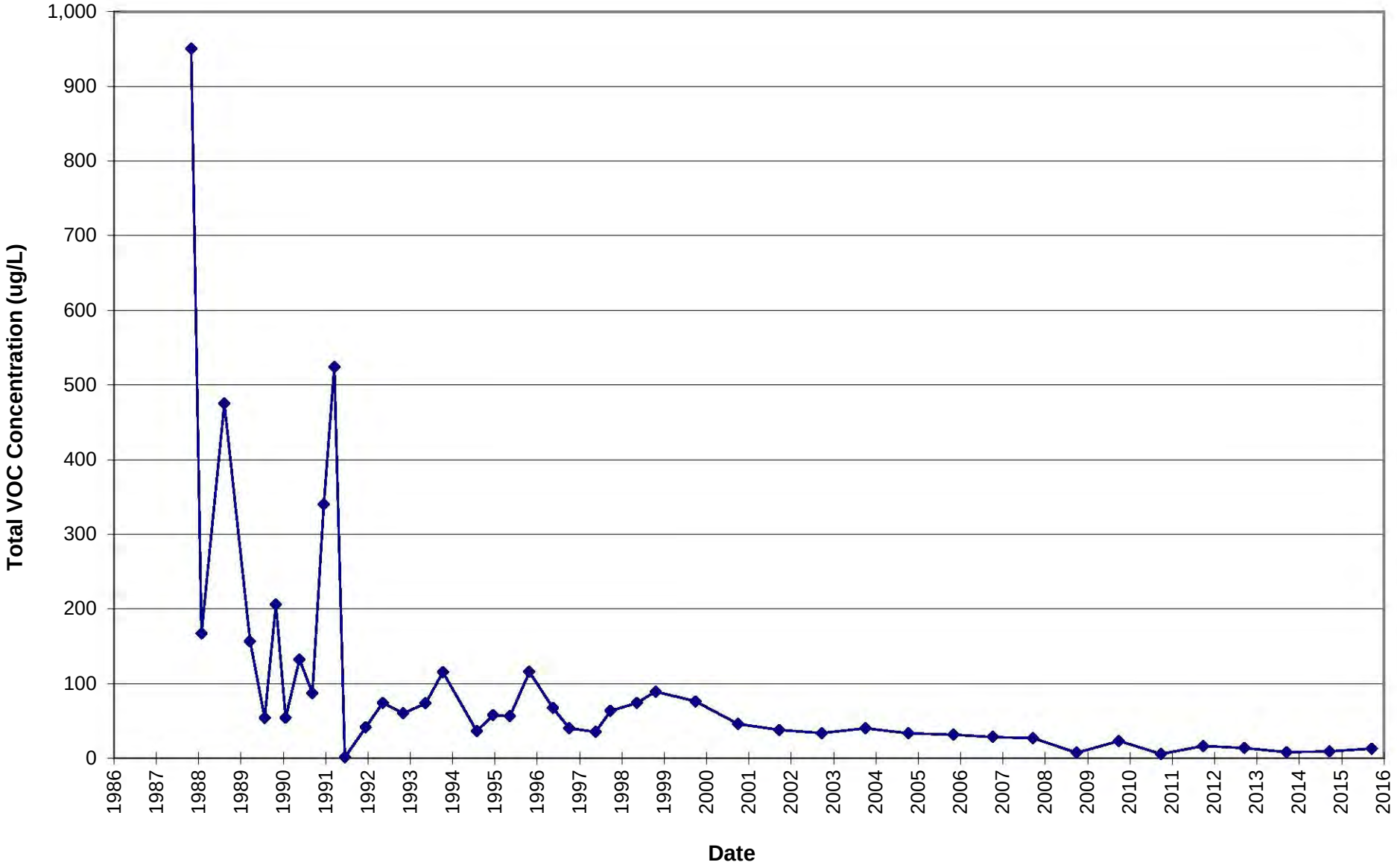


Figure 4.2

Total VOC Concentrations
MW4D
Highway 96 Site
White Bear Township, Minnesota

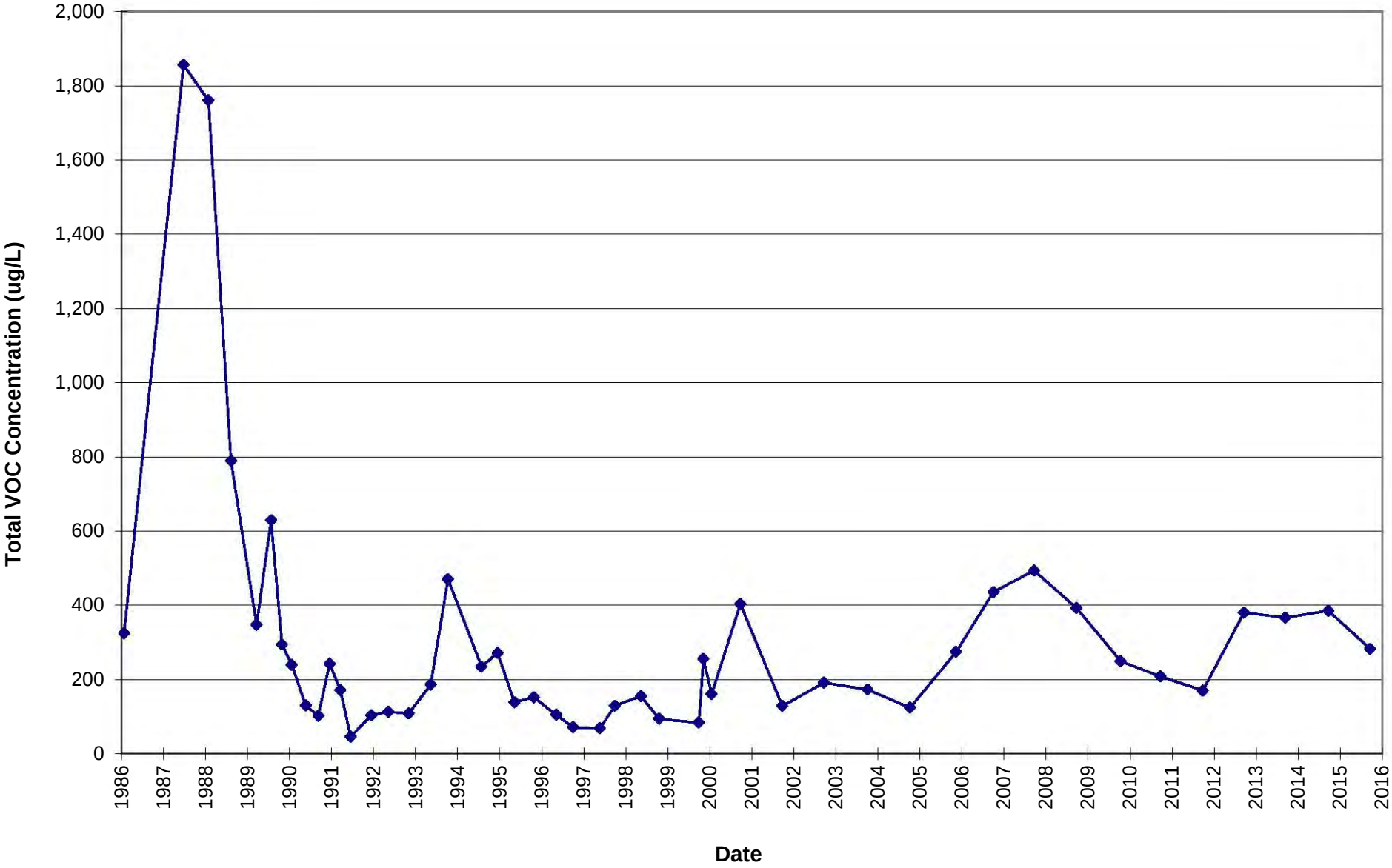


Figure 4.3

Total VOC Concentrations
MW12D
Highway 96 Site
White Bear Township, Minnesota

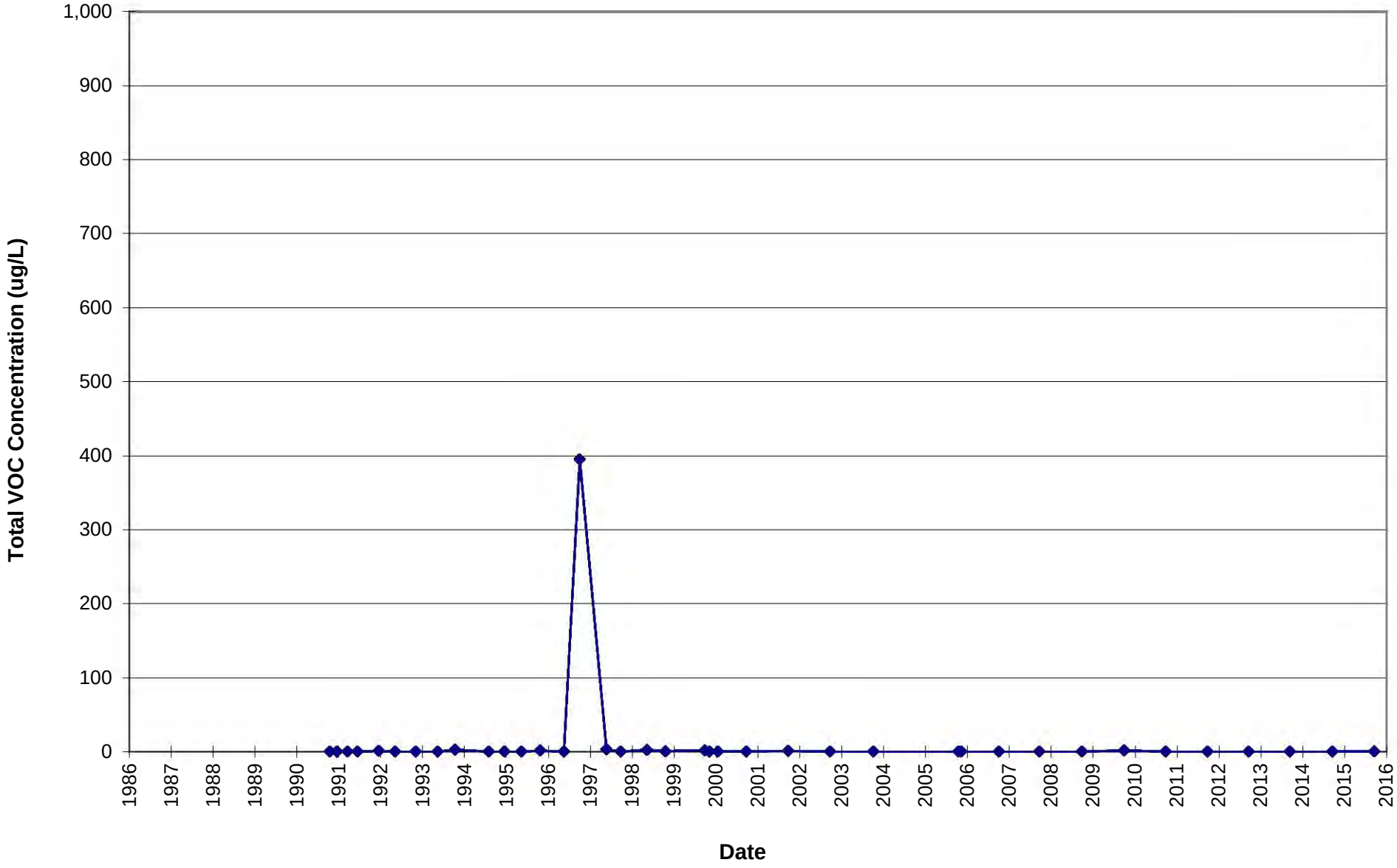


Figure 4.4

Total VOC Concentrations
MW8B
Highway 96 Site
White Bear Township, Minnesota

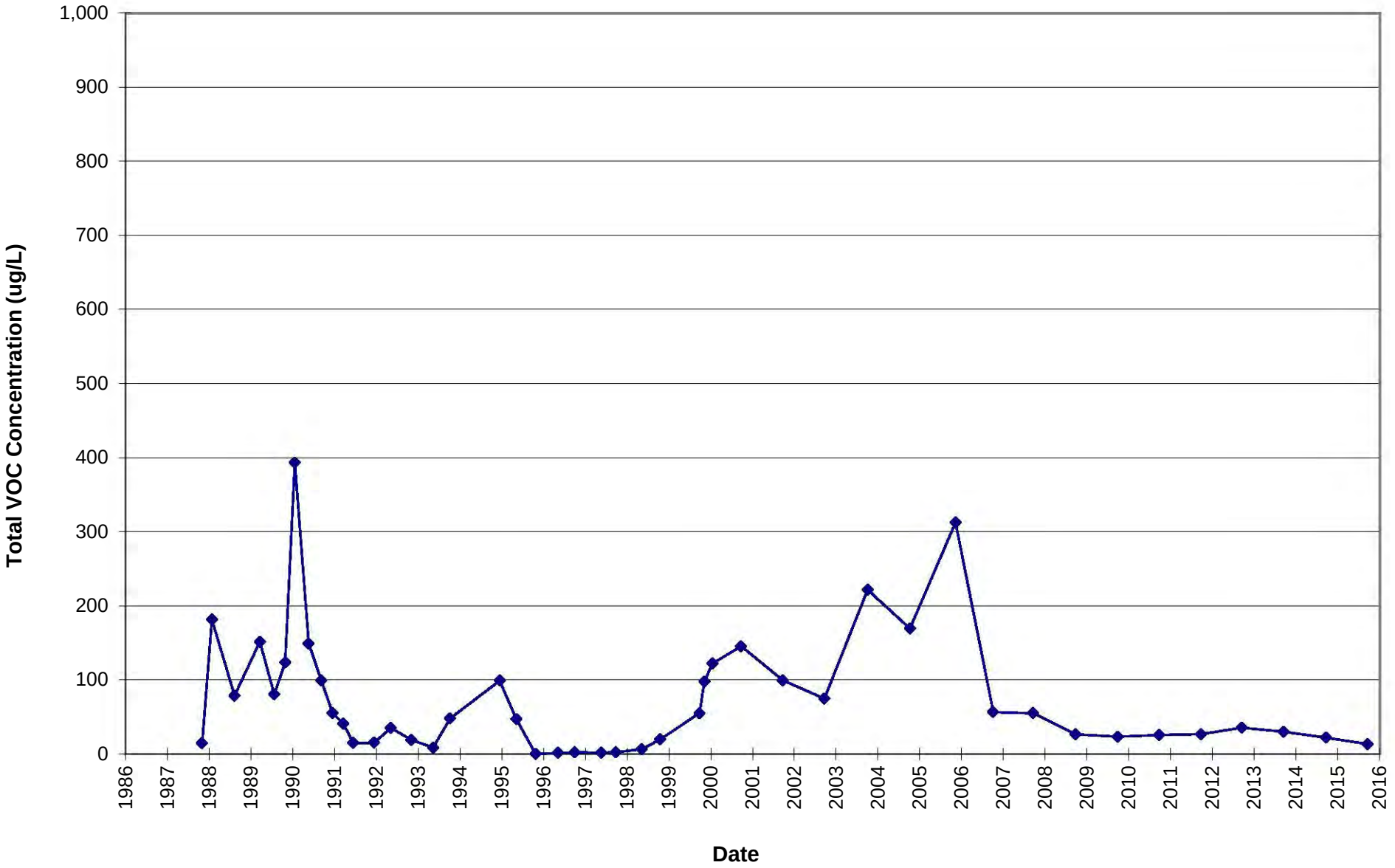


Figure 4.5

Total VOC Concentrations
MW12B
Highway 96 Site
White Bear Township, Minnesota

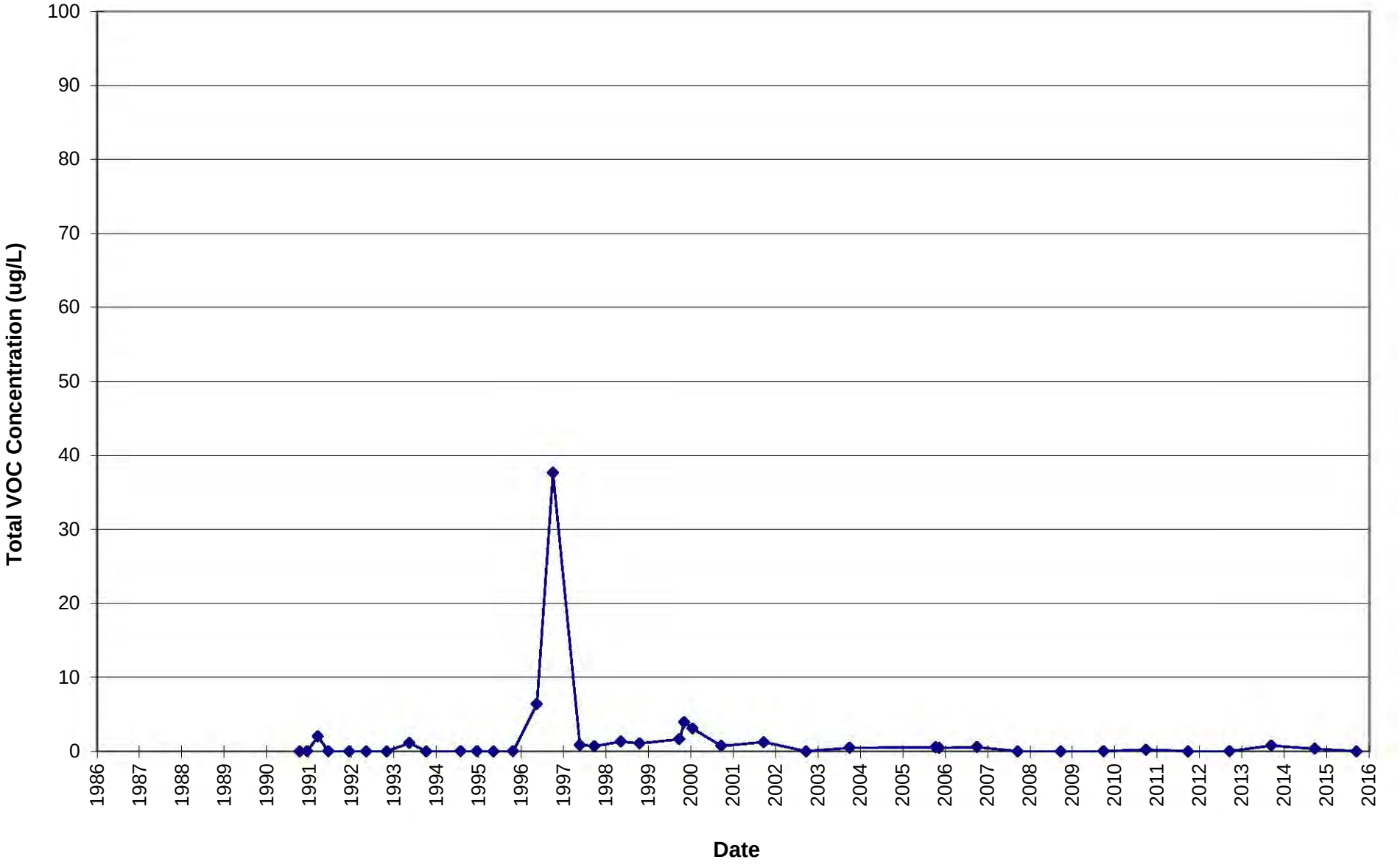


Figure 4.6

Total VOC Concentrations
11 Robb Farm Road
Highway 96 Site
White Bear Township, Minnesota

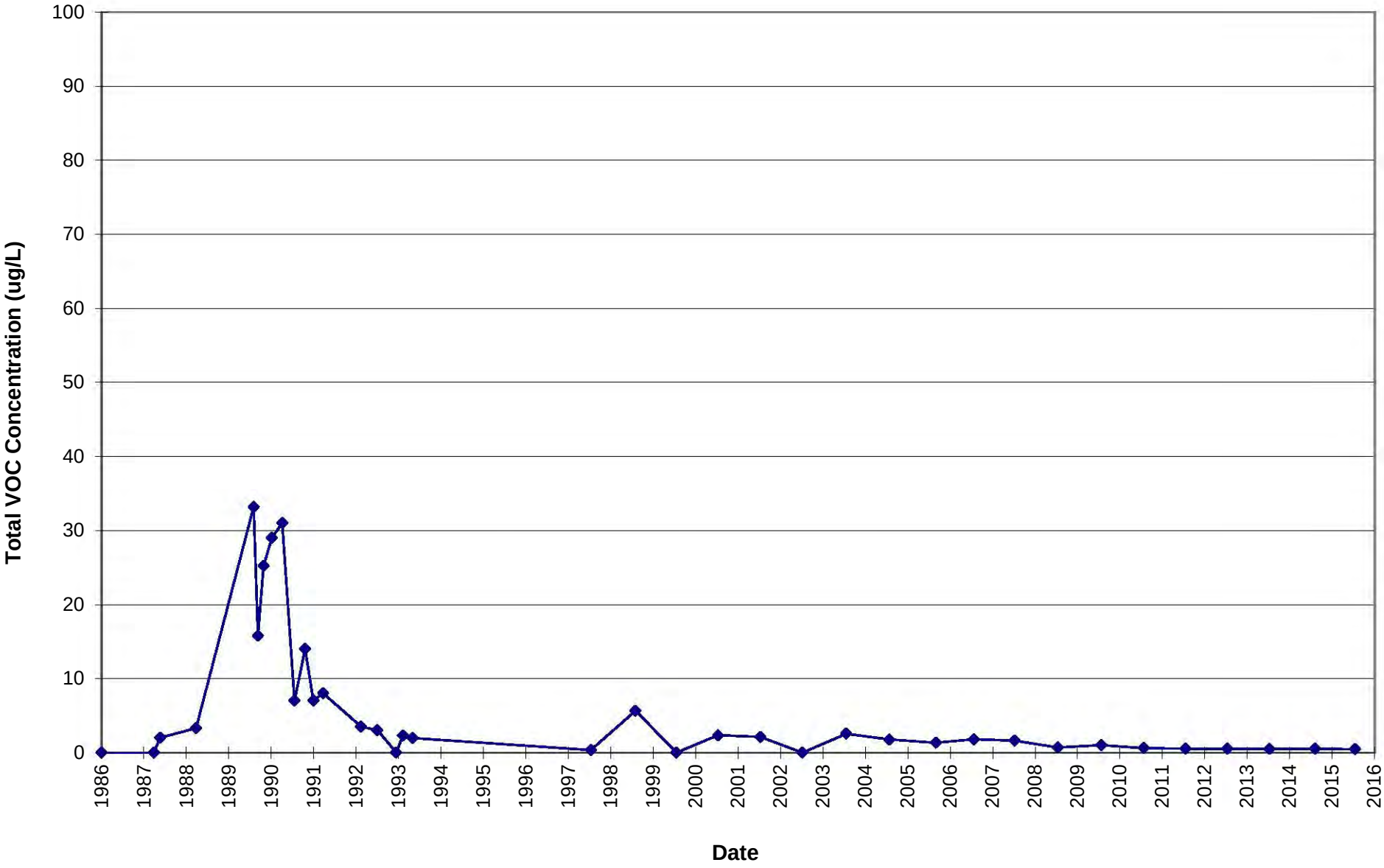
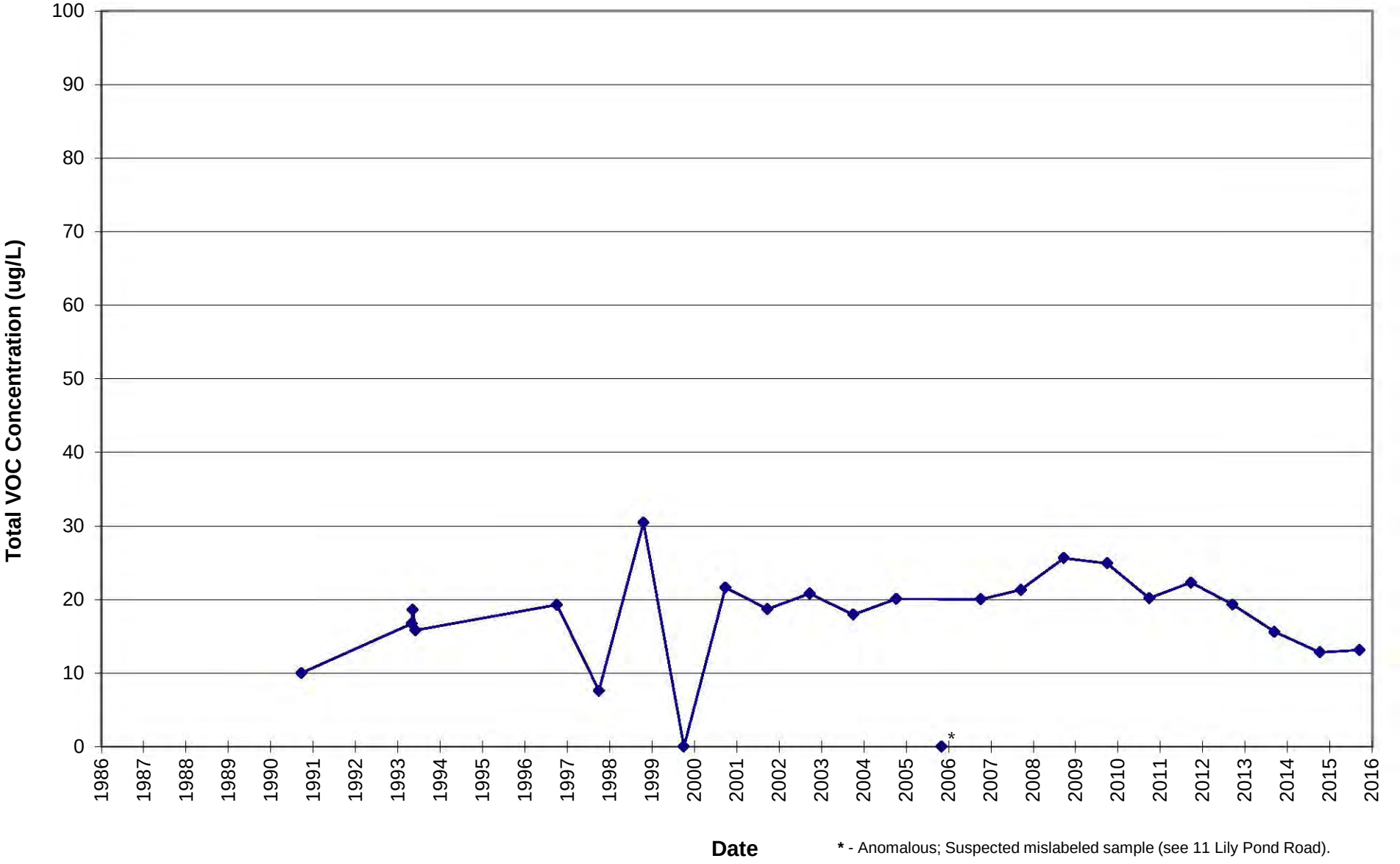


Figure 4.7

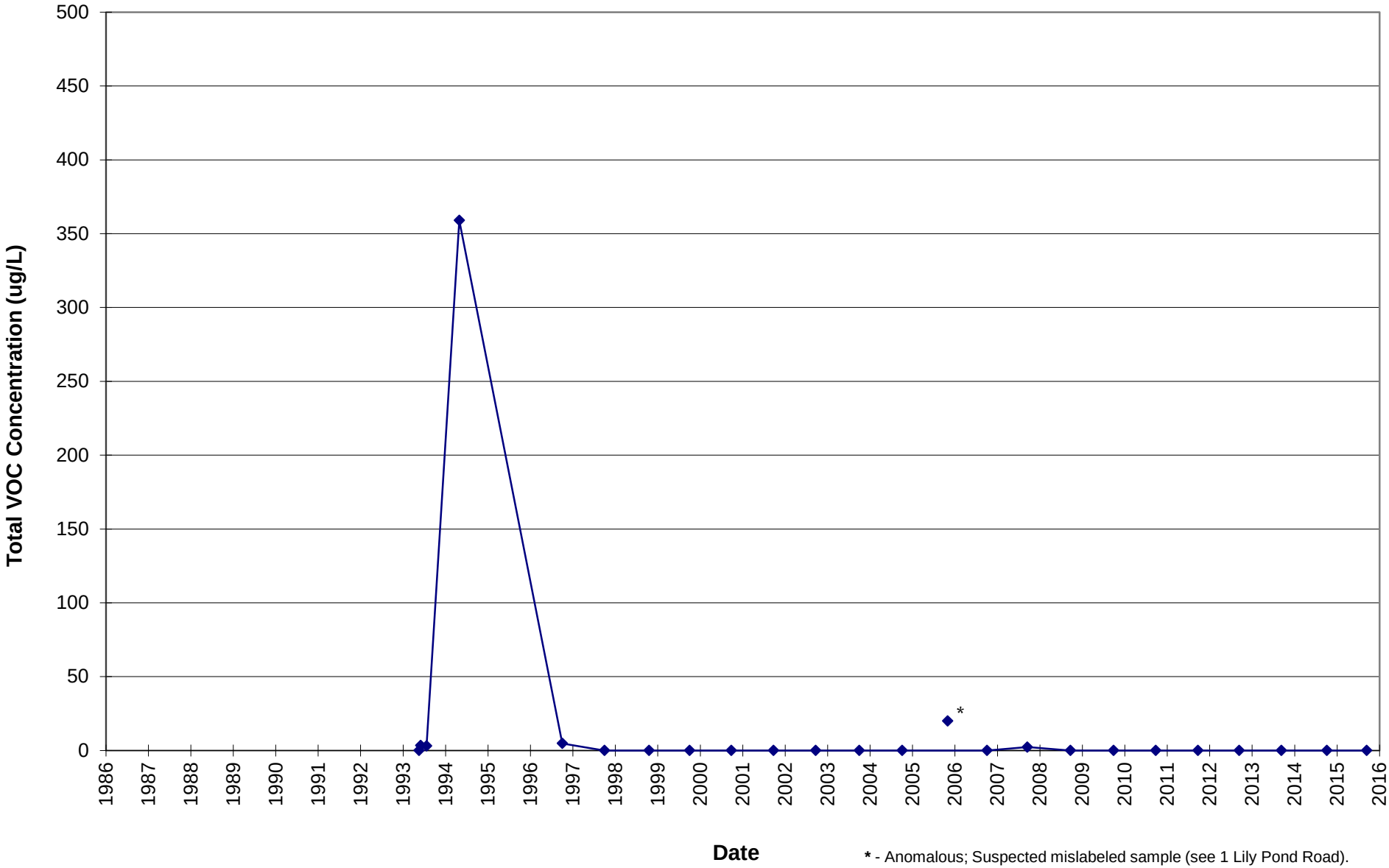
Total VOC Concentrations
1 Lily Pond Road
Highway 96 Site
White Bear Township, Minnesota



***** - Anomalous; Suspected mislabeled sample (see 11 Lily Pond Road).

Figure 4.8

Total VOC Concentration
11 Lily Pond Road
Highway 96 Site
White Bear Township, Minnesota



* - Anomalous; Suspected mislabeled sample (see 1 Lily Pond Road).

Figure 4.9

Total VOC Concentrations
6 Blue Goose Road
Highway 96 Site
White Bear Townshiip, Minnesota

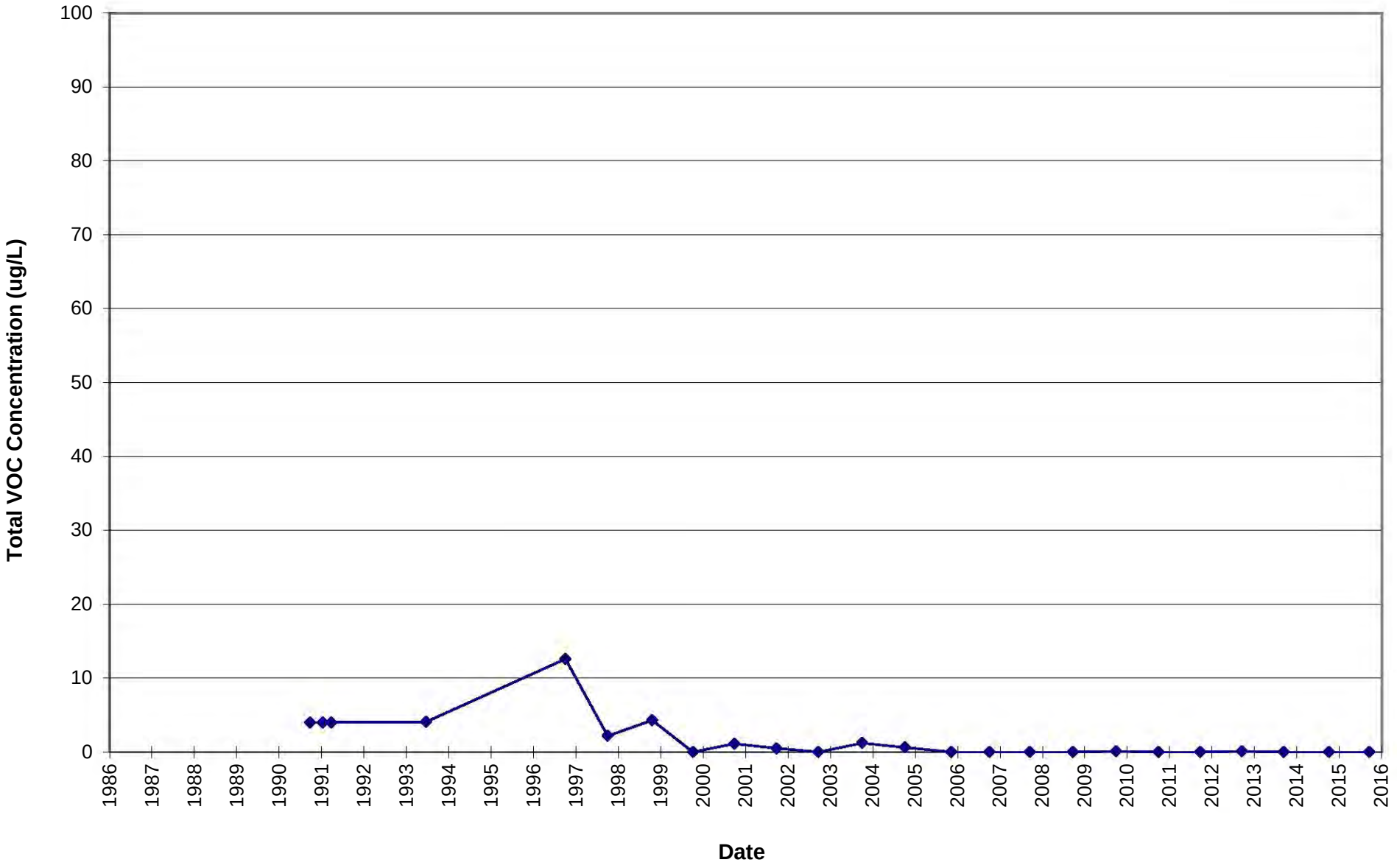
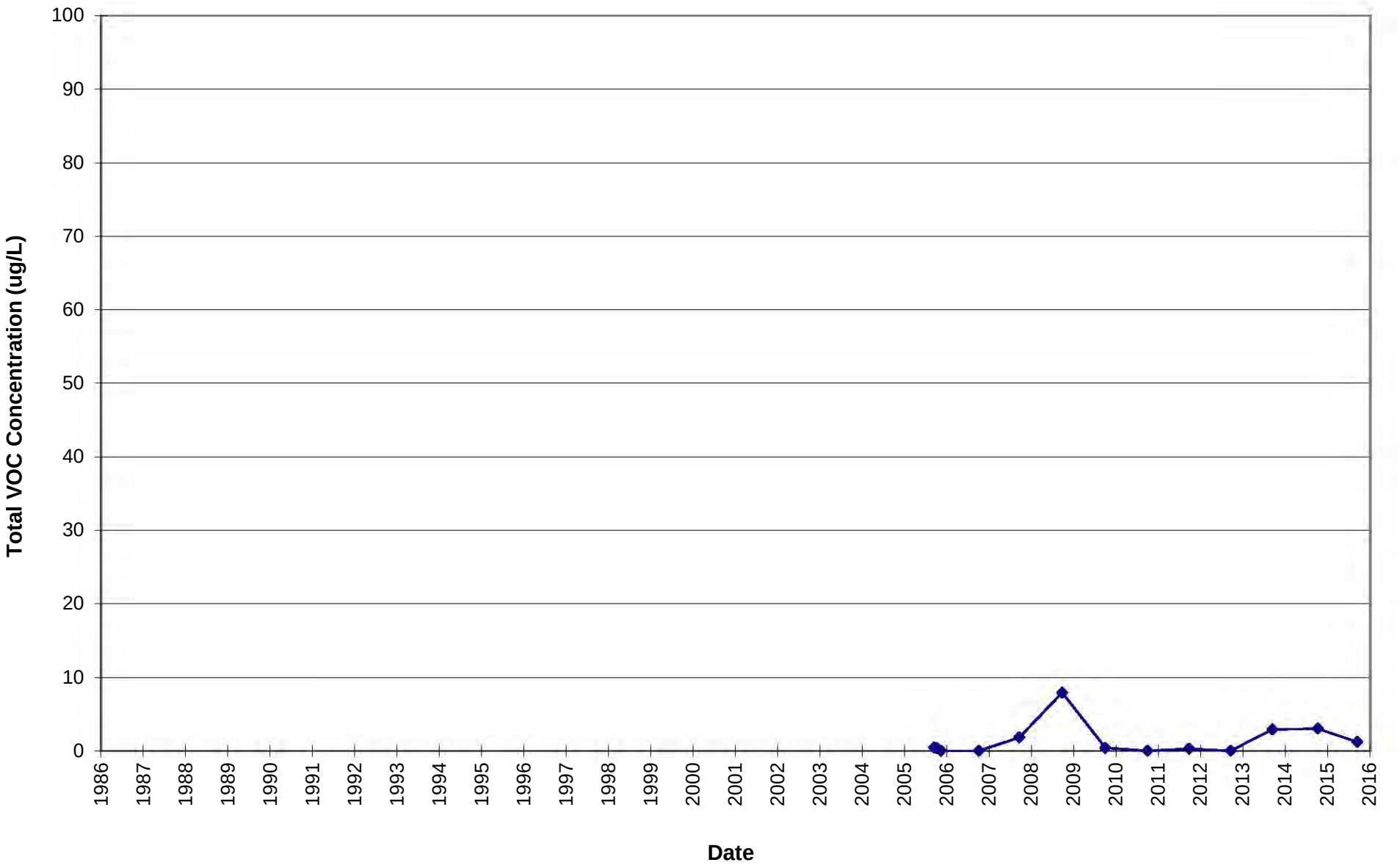


Figure 4.10

Total VOC Concentration
MW17L
Highway 96 Site
White Bear Township, Minnesota



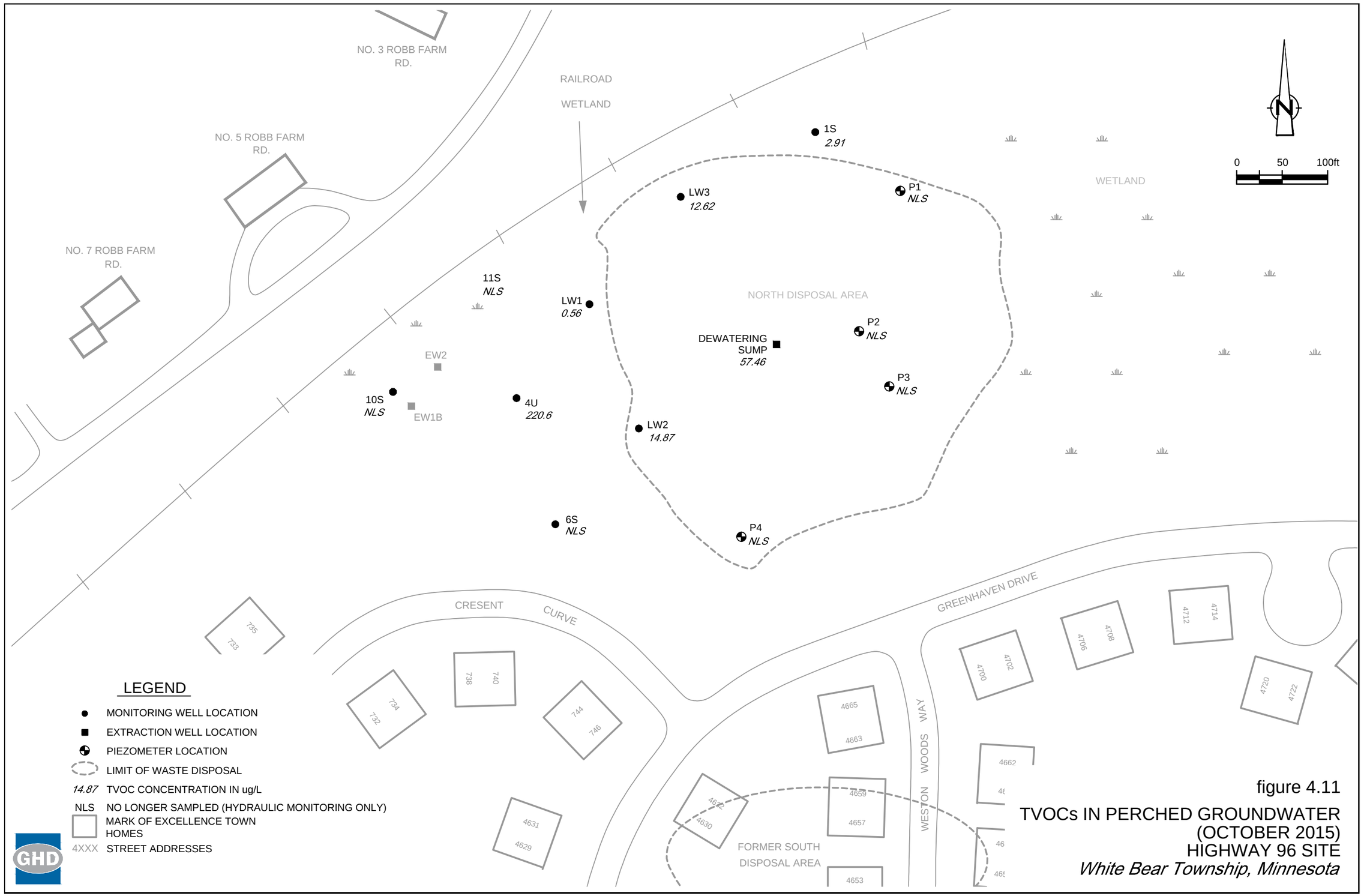


figure 4.11

TVOCs IN PERCHED GROUNDWATER (OCTOBER 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA015 FEB 1, 2016

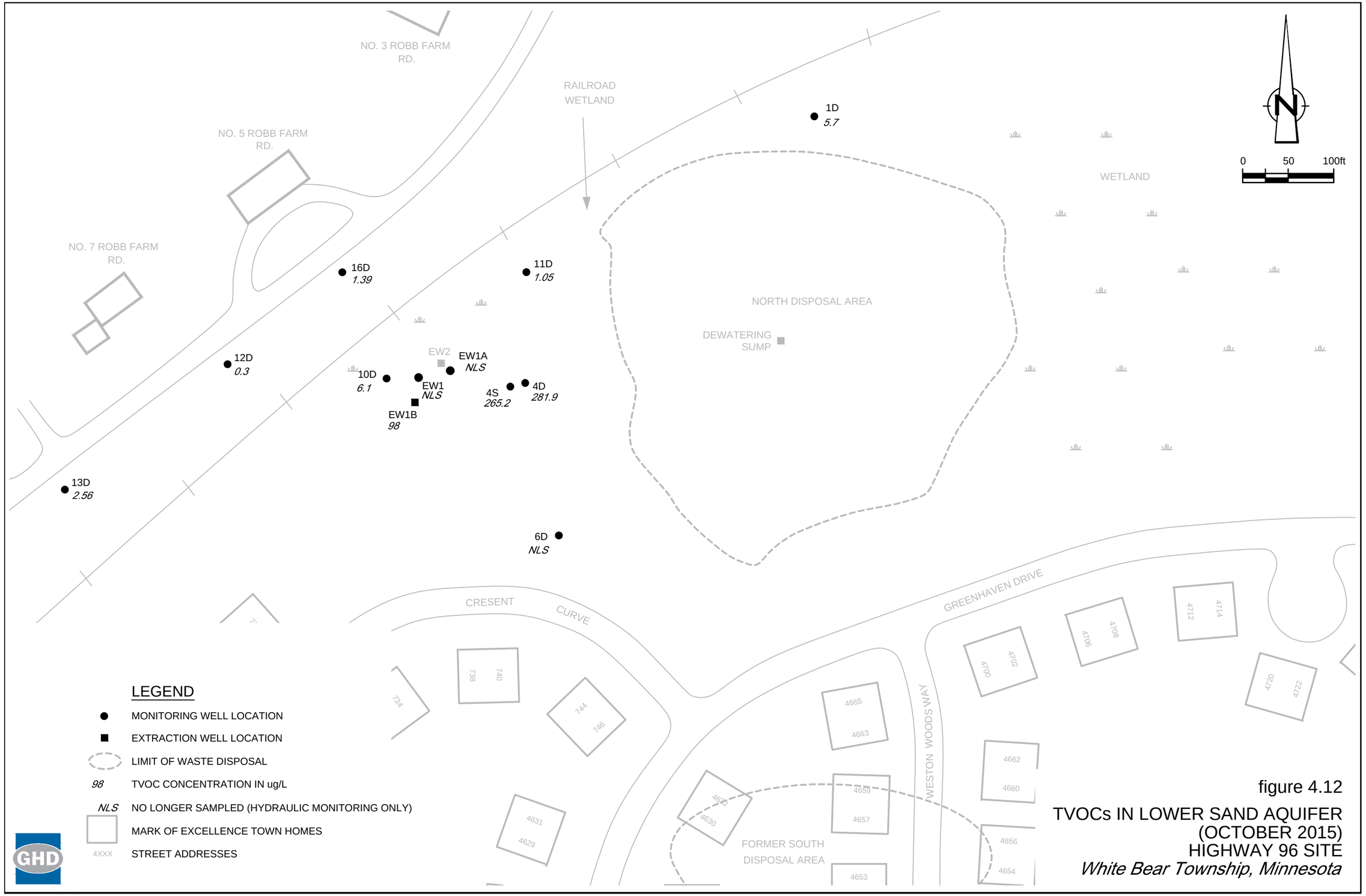


figure 4.12

TVOCs IN LOWER SAND AQUIFER
(OCTOBER 2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA016 FEB 1, 2016

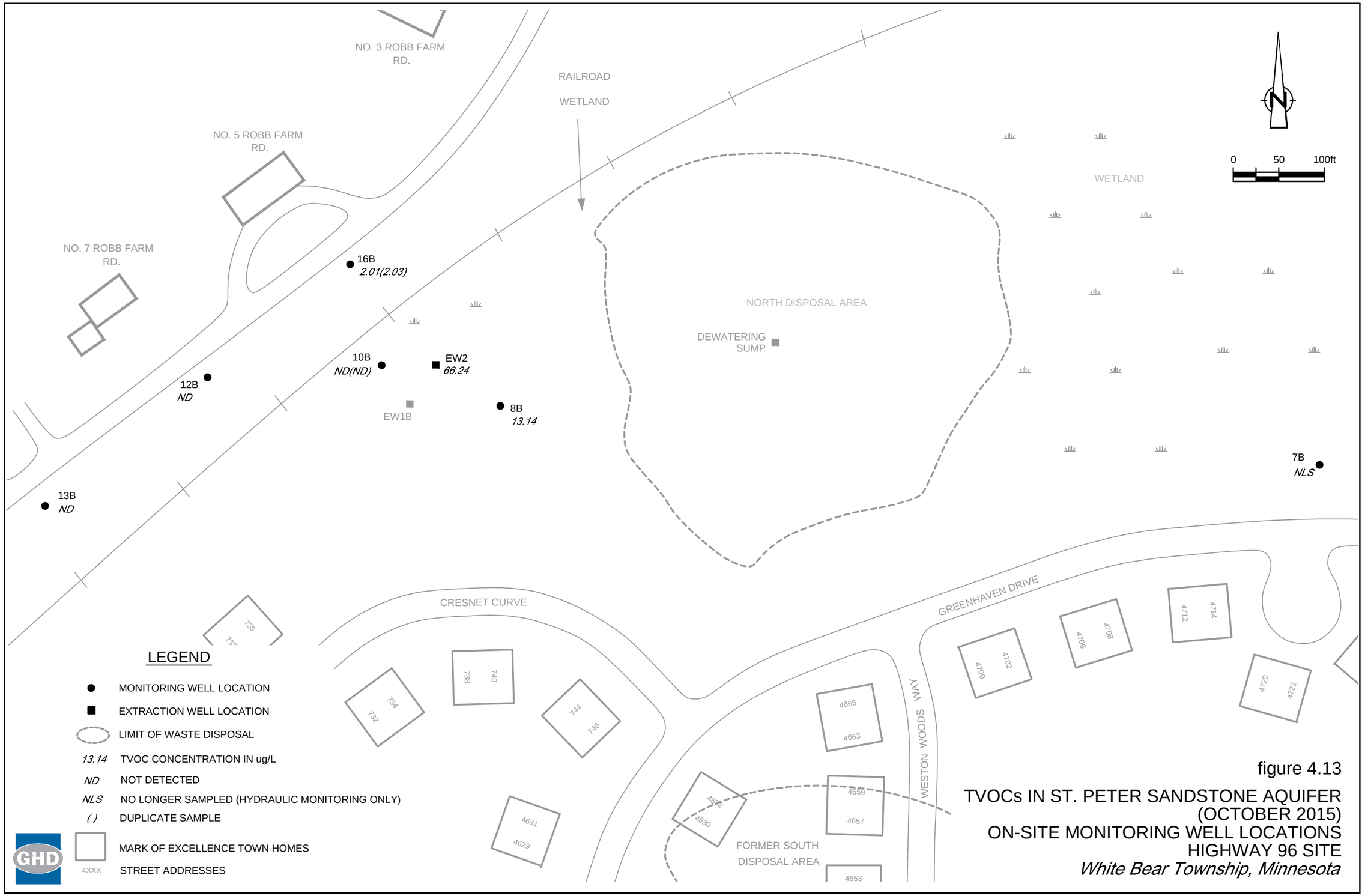
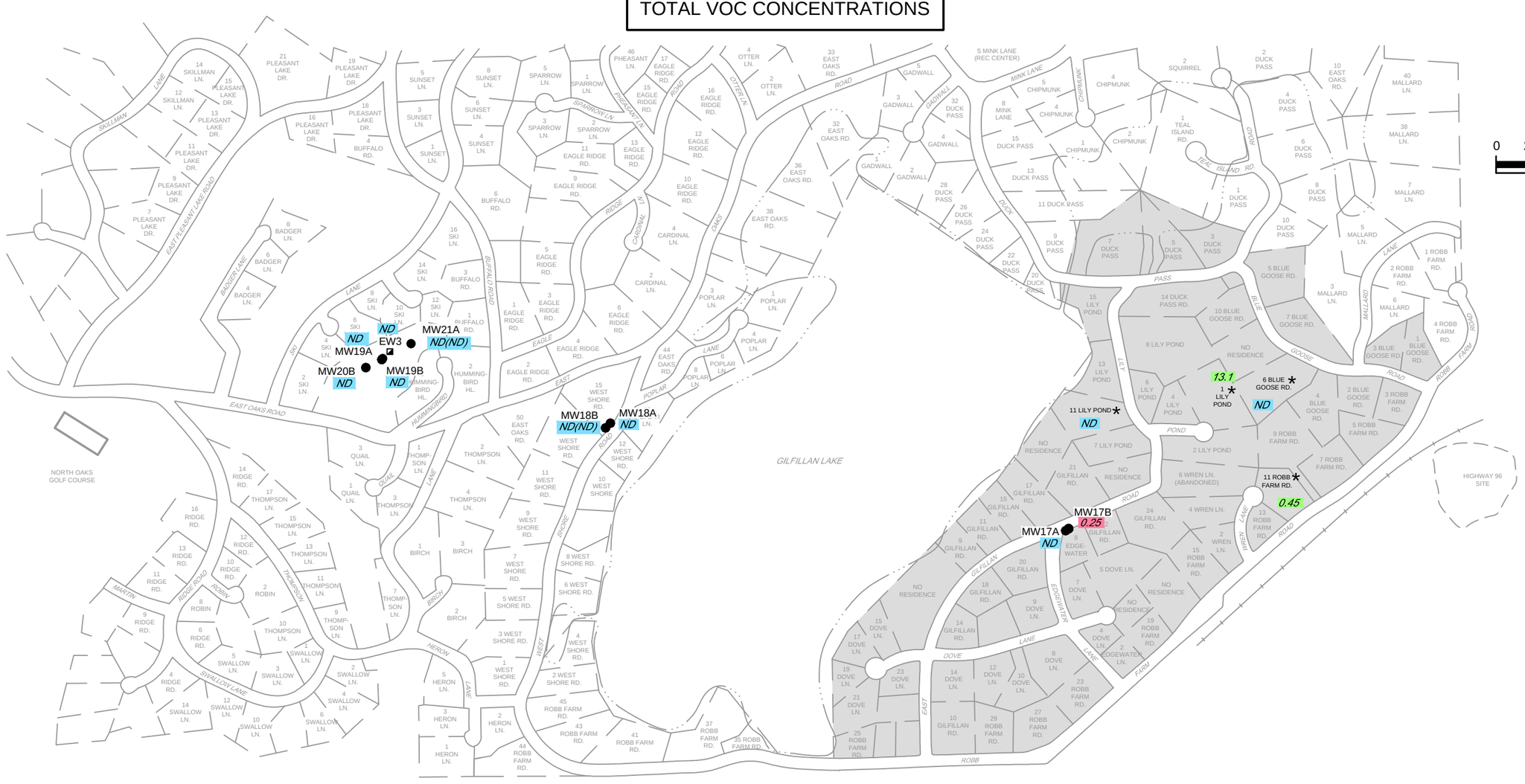


figure 4.13

TVOCs IN ST. PETER SANDSTONE AQUIFER (OCTOBER 2015)
ON-SITE MONITORING WELL LOCATIONS
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA017 FEB 1, 2016

TOTAL VOC CONCENTRATIONS



LEGEND

- TEST EXTRACTION WELL LOCATION
- MONITORING WELL LOCATION
- CONVERTED RESIDENTAL MONITORING WELL LOCATION
- *0.45* TVOC CONCENTRATION IN ug/L
- *ND* NOT DETECTED
- *( )* DUPLICATE SAMPLE
- CONNECTED TO MUNICIPAL WATER SUPPLY

- VOCS DETECTED, INCLUDING VINYL CHLORIDE. (VINYL CHLORIDE DETECTED ABOVE HRL (0.2ug/L; ALL OTHER DETECTIONS BELOW HRLS)
- VOCS DETECTED (ALL DETECTIONS BELOW HRLS); VINYL CHLORIDE NOT DETECTED
- VOCS NOT DETECTED

figure 4.14

TVOCs IN ST. PETER SANDSTONE AQUIFER (OCTOBER 2015)
OFF-SITE MONITORING WELL LOCATIONS
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA018 FEB 8, 2016

TOTAL VOC CONCENTRATIONS

LEGEND

- ● MONITORING WELL LOCATION
- * CONVERTED RESIDENTAL MONITORING WELL LOCATION
- *1.2* TVOC CONCENTRATION IN ug/L
- *ND* NOT DETECTED
- CONNECTED TO MUNICIPAL WATER SUPPLY
- VOCS DETECTED (ALL DETECTIONS BELOW HRLS); VINYL CHLORIDE NOT DETECTED
- VOCS NOT DETECTED

figure 4.15

TVOCs IN PRAIRIE DU CHIEN AQUIFER
(OCTOBER 2015)
OFF-SITE MONITORING WELL LOCATIONS
White Bear Township, Minnesota

TOTAL VOC CONCENTRATIONS

AREA 1

AREA 2

AREA 3

AREA 4

AREA 5

0 200 600ft

GILFILLAN LAKE

NORTH OAKS GOLF COURSE

HIGHWAY 96 SITE

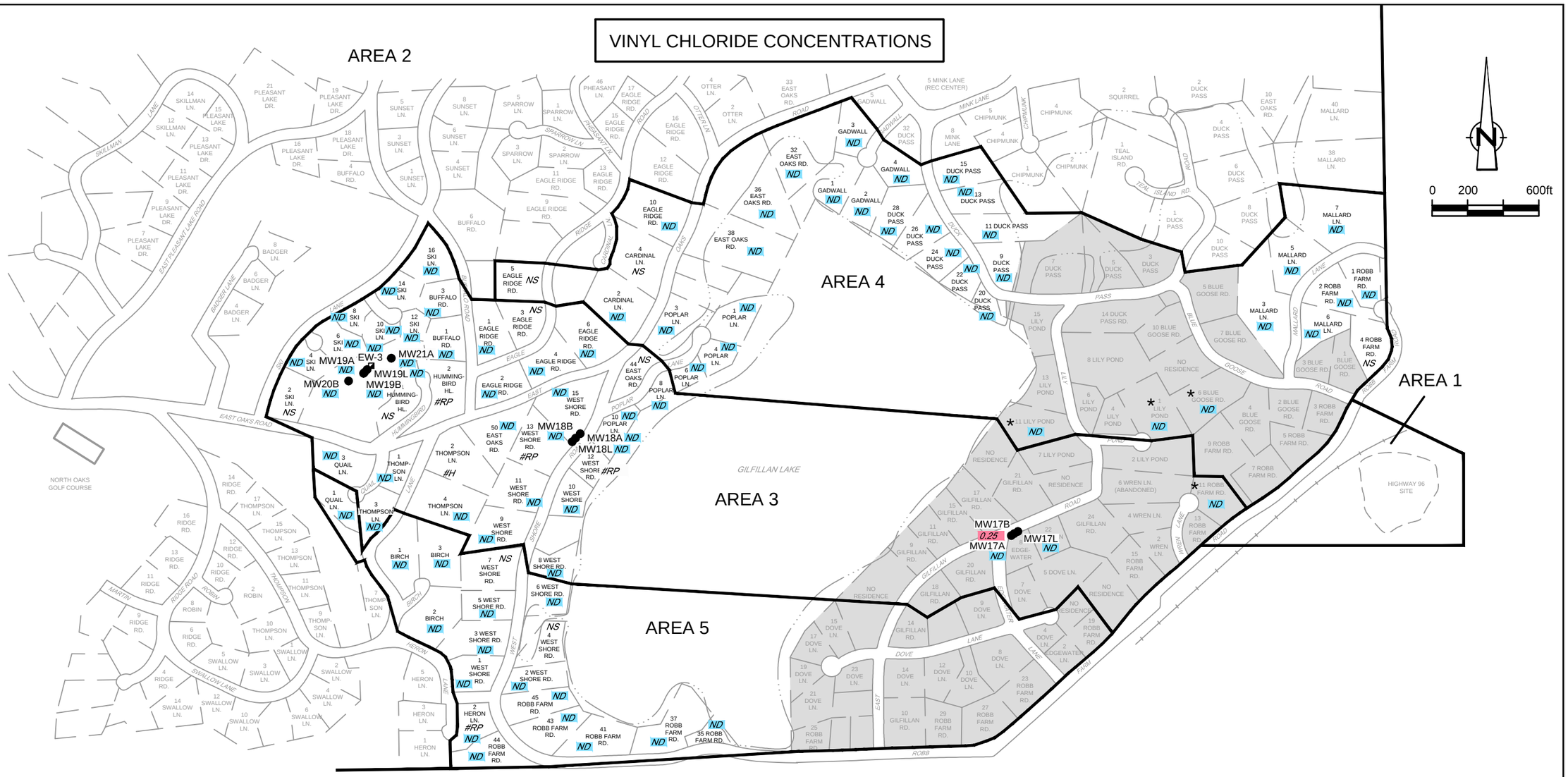
LEGEND

- GEOGRAPHIC AREAS
- *1.44* MAXIMUM TVOC CONCENTRATION IN µg/L
- * CONVERTED RESIDENTAL MONITORING WELL LOCATION
- *ND* NOT DETECTED
- *NS* NOT SAMPLED (NO RESPONSE/DECLINED/WATER OFF)
- *[ ]* NEW (DEEPER) WELL RESULT
- *#RP* NEW (DEEPER) REPLACEMENT WELL INSTALLED BY RESPONSIBLE PARTIES (RPs)
- *#H* NEW (DEEPER) REPLACEMENT WELL INSTALLED BY HOMEOWNER.
- CONNECTED TO MUNICIPAL WATER SUPPLY
- VOCS DETECTED (ALL DETECTIONS BELOW HRLS); VINYL CHLORIDE NOT DETECTED
- VOCS NOT DETECTED

figure 4.16

MAXIMUM TVOC CONCENTRATIONS
IN RESIDENTIAL WELLS (2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

VINYL CHLORIDE CONCENTRATIONS



LEGEND

- GEOGRAPHIC AREAS
- 0.25 — MAXIMUM VINYL CHLORIDE CONCENTRATION IN µg/L
- * — CONVERTED RESIDENTAL MONITORING WELL LOCATION
- J — ESTIMATED RESULT
- ND — NOT DETECTED (MAXIMUM DETECTION LIMIT 0.059 µg/L)
- NS — NOT SAMPLED (NO RESPONSE/DECLINED/WATER OFF)
- [ ] — NEW (DEEPER) WELL RESULT
- #RP — NEW (DEEPER) REPLACEMENT WELL INSTALLED BY RESPONSIBLE PARTIES (RPs)
- #H — NEW (DEEPER) REPLACEMENT WELL INSTALLED BY HOMEOWNER.
- CONNECTED TO MUNICIPAL WATER SUPPLY
- VINYL CHLORIDE DETECTED ABOVE HRL (0.2 ug/L)
- VINYL CHLORIDE NOT DETECTED

figure 4.17

MAXIMUM VINYL CHLORIDE CONCENTRATIONS
IN OFF-SITE MONITORING WELL AND RESIDENTIAL WELL LOCATIONS (2015)
HIGHWAY 96 SITE
White Bear Township, Minnesota

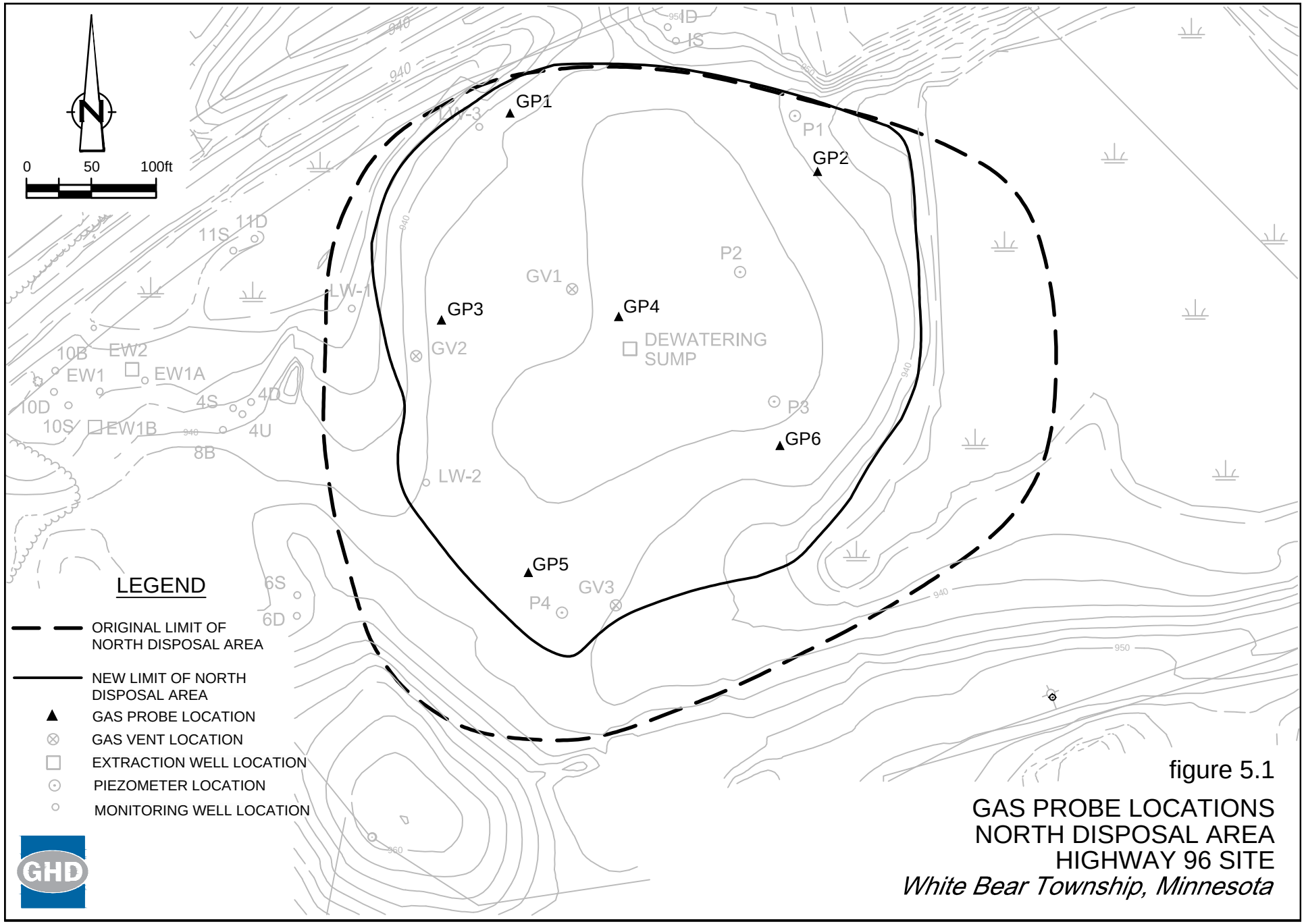


figure 5.1

GAS PROBE LOCATIONS
NORTH DISPOSAL AREA
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA009 FEB 1, 2016

Figure 5.2

% Combustible Gas Concentrations
GP1
Highway 96 Site
White Bear Township, Minnesota

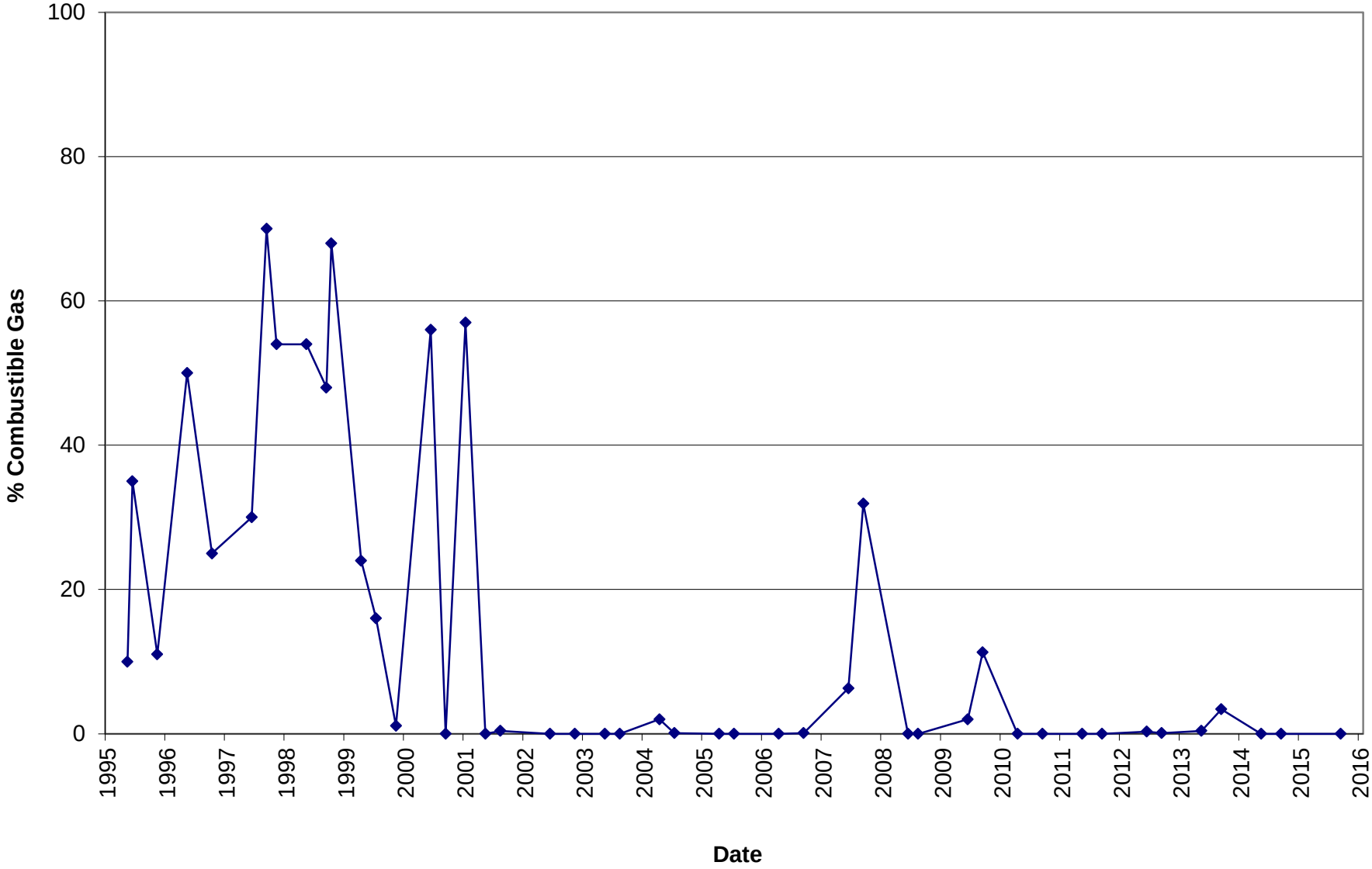


Figure 5.3

% Combustible Gas Concentrations
GP2
Highway 96 Site
White Bear Township, Minnesota

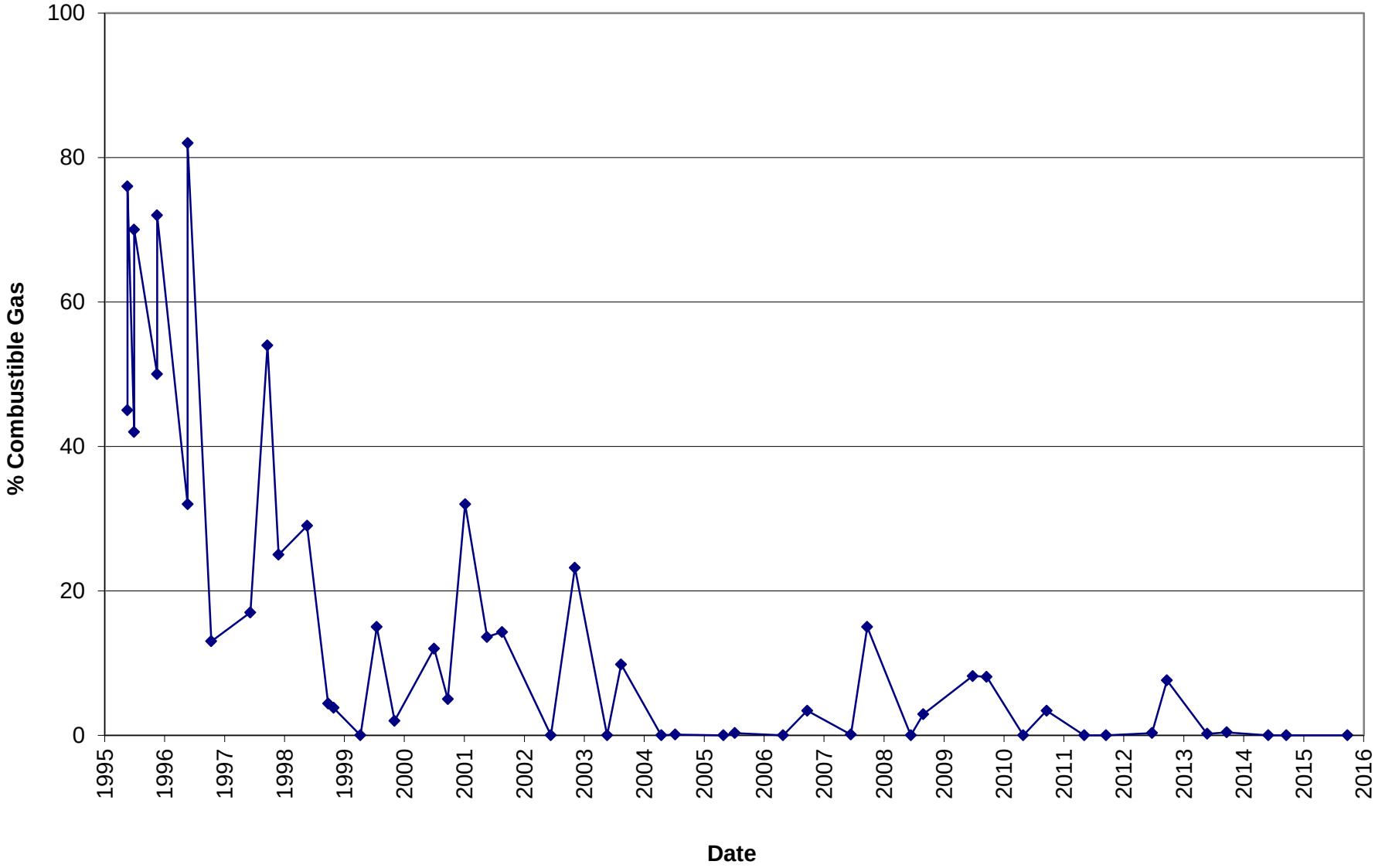


Figure 5.4

% Combustible Gas Concentrations
GP3
Highway 96 Site
White Bear Township, Minnesota

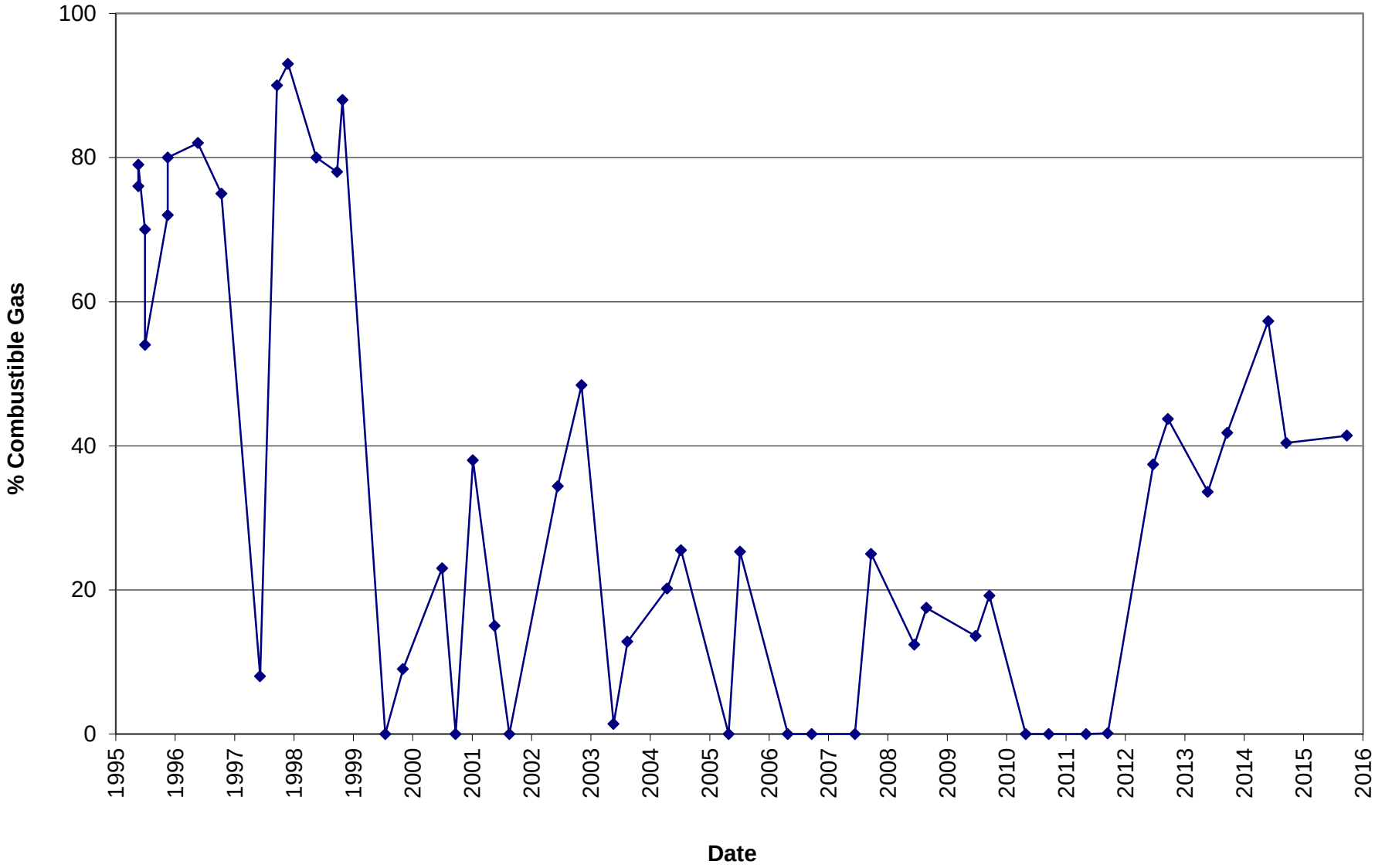


Figure 5.5

% Combustible Gas Concentrations
GP4
Highway 96 Site
White Bear Township, Minnesota

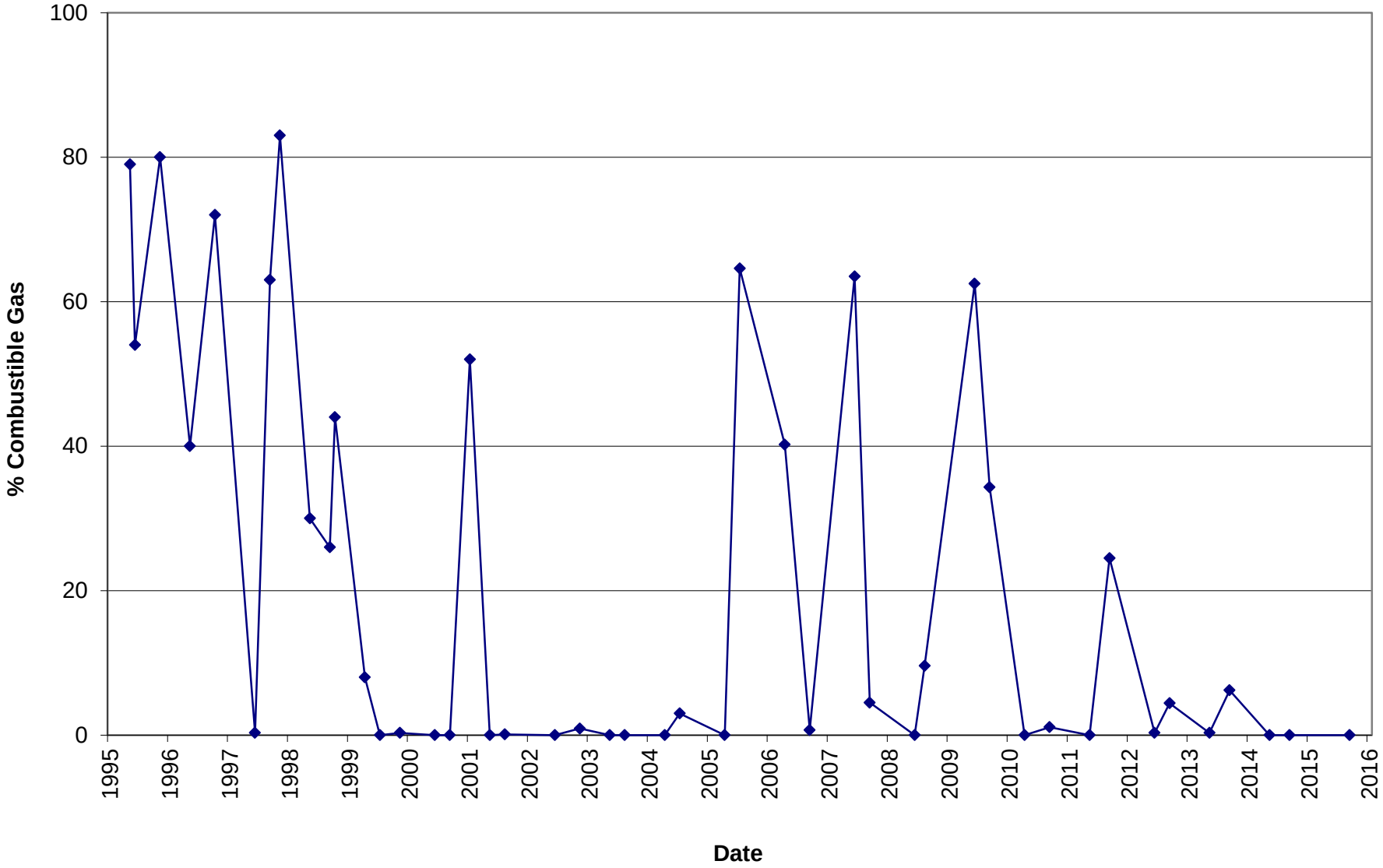


Figure 5.6

% Combustible Gas Concentrations
GP5
Highway 96 Site
White Bear Township, Minnesota

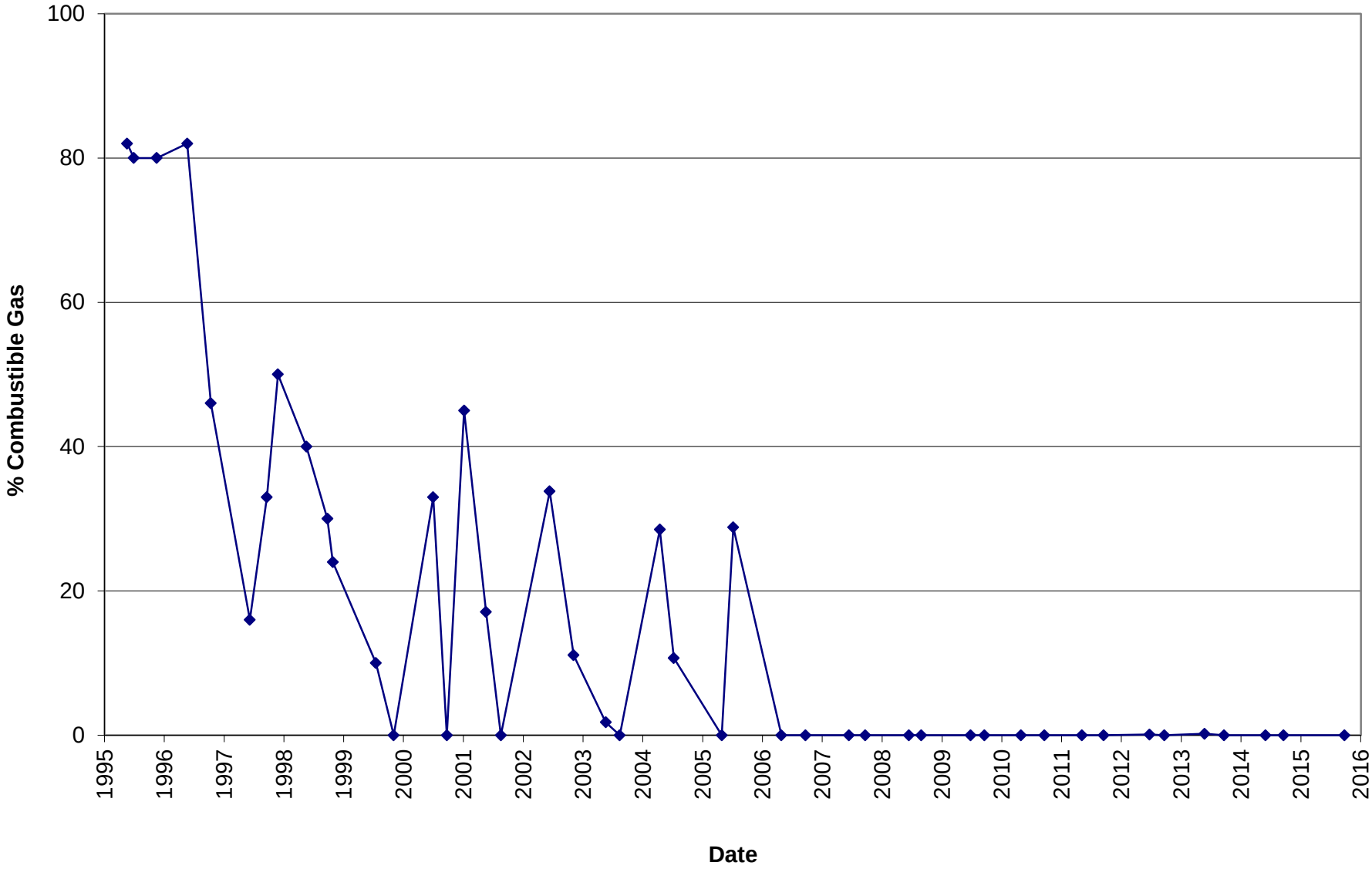
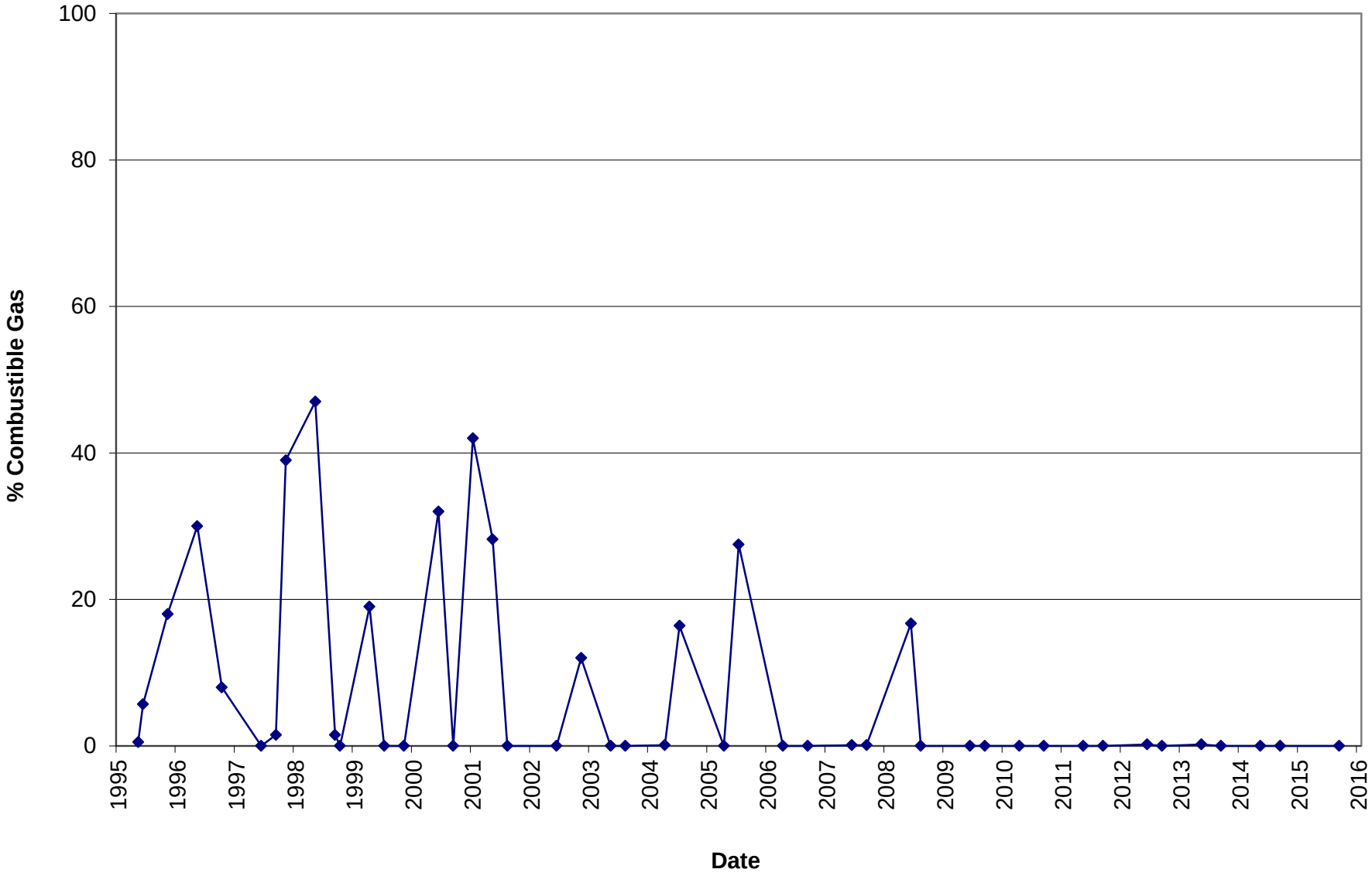


Figure 5.7

% Combustible Gas Concentrations
GP6
Highway 96 Site
White Bear Township, Minnesota



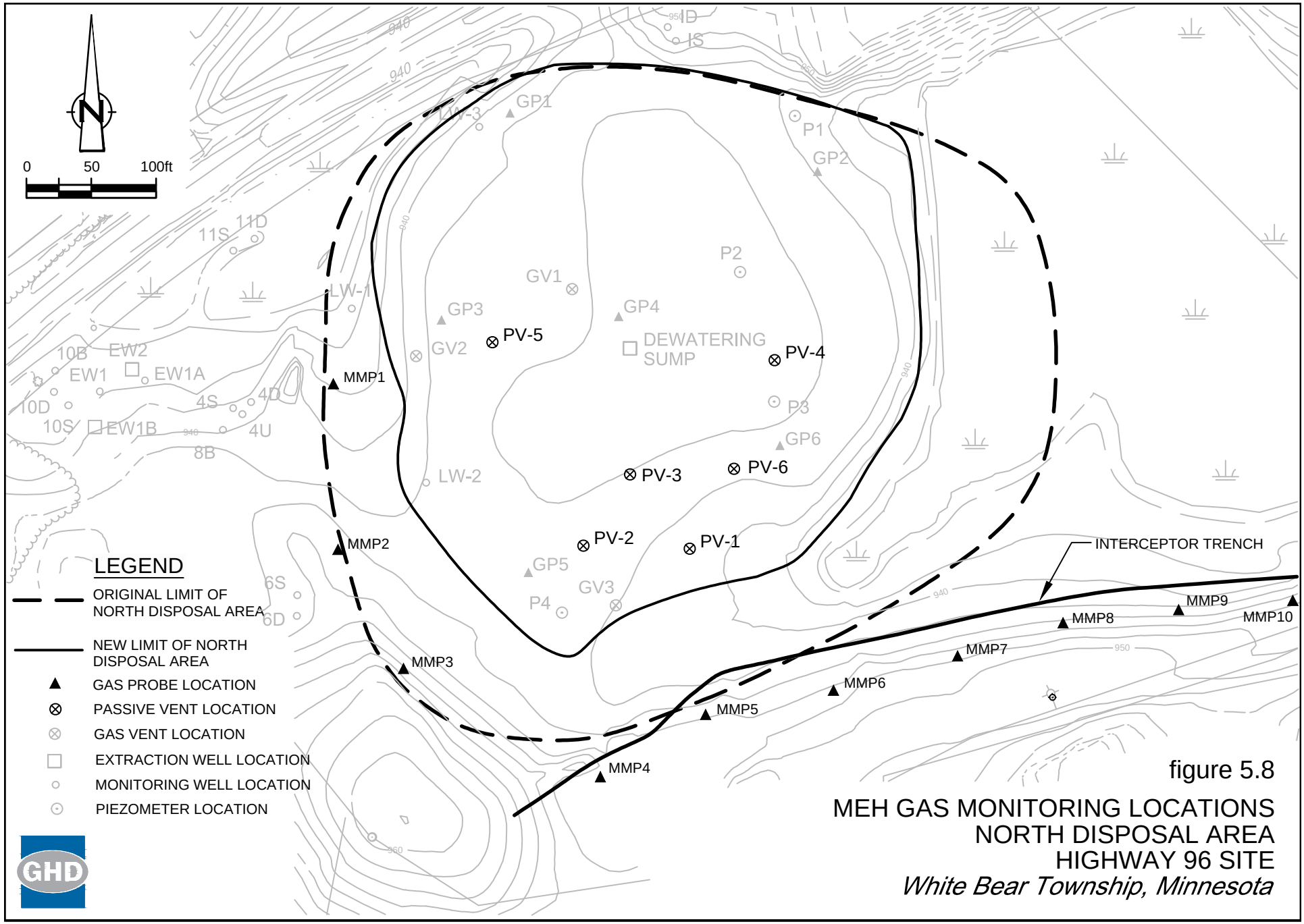


figure 5.8

MEH GAS MONITORING LOCATIONS
NORTH DISPOSAL AREA
HIGHWAY 96 SITE
White Bear Township, Minnesota

02012-00(066)GN-WA008 FEB 1, 2016

Tables

Table 3.1

2015 Groundwater Elevations
Highway 96 Site
White Bear Township, Minnesota

Location	TOC (ft. AMSL)	10/5/2015 WL (ft BTOC)	10/5/2015 (ft. AMSL)
Perched Groundwater Unit			
DEWATERING SUMP * (On)	946.71	25.90	920.81
LW1	938.86	7.76	931.10
LW2	945.66	7.44	938.22
LW3	944.82	7.45	937.37
MW1S	950.65	17.62	933.03
MW4U	939.65	25.84	913.81
MW6S	948.44	18.14	930.30
MW10S	935.94	4.47	931.47
MW11S	936.34	4.17	932.17
P1	941.70	8.37	933.33
P2	946.11	19.33	926.78
P3	947.11	17.52	929.59
P4	948.16	17.35	930.81
Glacial Drift (Lower Sand) Aquifer			
EW1	936.66	39.61	897.05
EW1A	938.67	41.36	897.31
EW1B * (On)	939.99	47.48	892.51
MW1D	951.02	52.05	898.97
MW4S	940.33	38.25	902.08
MW4D	940.48	42.77	897.71
MW6D	948.15	49.05	899.10
MW10D	935.94	31.21	904.73
MW11D	935.40	31.47	903.93
MW12D	940.52	37.92	902.60
MW13D	937.66	36.39	901.27
MW16D	940.70	42.19	898.51

Table 3.1

2015 Groundwater Elevations
Highway 96 Site
White Bear Township, Minnesota

Location	TOC (ft. AMSL)	10/5/2015 WL (ft BTOC)	10/5/2015 (ft. AMSL)
Upper St. Peter Sandstone Aquifer			
EW2 * (On)	938.67	43.65	895.02
MW7B	942.91	42.83	900.08
MW8B	940.91	43.38	897.53
MW10B	936.64	39.06	897.58
MW12B	939.89	42.32	897.57
MW13B	938.34	40.82	897.52
MW16B	940.71	42.71	898.00
MW17A	914.58	19.07	895.51
MW18A	925.39	34.08	891.31
MW19A	913.56	25.47	888.09
MW21A	909.03	20.76	888.27
Basal St. Peter Sandstone Aquifer			
EW3	913.88	30.92	882.96
MW17B	914.50	26.51	887.99
MW18B	925.24	37.81	887.43
MW19B	913.33	30.65	882.68
MW20B	915.04	31.73	883.31
1 Lily Pond Road #	931.18	35.38	895.80
11 Lily Pond Road #	928.54	39.35	889.19
11 Robb Farm Road #	942.63	46.66	895.97
6 Blue Goose Road #	954.15	63.05	891.10
6 West Shore Road ^	920.20	36.74	883.46
38 East Oaks Road ^	926.25	40.99	885.26

Table 3.1

2015 Groundwater Elevations
Highway 96 Site
White Bear Township, Minnesota

Location	TOC (ft. AMSL)	10/5/2015 WL (ft BTOC)	10/5/2015 (ft. AMSL)
Prairie du Chien Aquifer			
MW17L	914.65	31.27	883.38
MW18L	925.44	44.77	880.67
MW19L	914.18	35.67	878.51

Notes:

TOC - Top of Casing
WL - Water Level
ft. AMSL - Feet Above Mean Sea Level
ft. BTOC - Feet Below Top of Casing
* - Pumping Well
- Dewatering Sump pumping at a rate of approximately 3.1 gpm
- EW1B pumping at a rate of approximately 10.1 gpm
- EW2 pumping at a rate of approximately 10.1 gpm
- Converted Residential Monitoring Well
^ - Active Residential Well

Table 3.2

2015 Average Monthly Groundwater Extraction Rates
Highway 96 Site
White Bear Township, Minnesota

	Average Pumping Rate			
Month	**EW1B (gpm)**	**EW2 (gpm)**	**Combined* (gpm)**	**Dewatering Sump (gpm)**
January	10.2	10.3	20.5	3.1
February	10.2	10.1	20.3	3.1
March	10.1	10.1	20.2	1.0 (1)
April	10.2	10.1	20.3	0.0
May	8.1 (2)	8.8 (3)	16.9	1.2 (4)
June	9.6 (2)	9.5 (3)	19.0	5.4
July	9.9	9.8	19.7	4.9
August	10.1	10.0	20.1	5.0
September	10.0	10.5	20.5	4.5
October	9.5	9.7	19.2	3.4
November	9.9 (5)	10.1 (6)	19.9	2.9
December	9.0 (5)	9.8 (6)	18.8	4.4
Annual Average	9.7	9.9	19.6	3.2

Notes:

* - Combined pumping rate of EW1B and EW2 to be maintained between 13 and 20 gpm, as outlined in CRA's letter to MPCA dated July 9, 2010.

(1) - Shut off the Dewatering Sump on March 11, 2015 due to low water level.
(2) - Routine well rehabilitation of EW1B conducted from May 25 through June 2, 2015.
(3) - Routine well rehabilitation of EW2 conducted from May 25 through June 2, 2015.
(4) - Restarted the Dewatering Sump on May 21, 2015 after allowing the water level to recharge.
(5) - Routine well rehabilitation of EW1B conducted from November 30 through December 4, 2015.
(6) - Routine well rehabilitation of EW2 conducted from November 30 through December 2, 2015.

Table 3.3

Operation and Maintenance Activities
Groundwater Extraction System
January 2015 - December 2015
Highway 96 Site
White Bear Township, Minnesota

Date	Location	Event	Remedy	Contractor
03/11/2015	Dewatering Sump	Low Perched Groundwater Conditions.	Shut-off pump to prevent cycling and allow recharge.	CRA (M. Barnes)
05/21/2015	Dewatering Sump	Sufficient Recharge of Perched Groundwater System.	Restarted pump.	CRA (M. Barnes)
05/25/2015 - 06/02/2015	EW1B and EW2	Routine Well Rehabilitation	Performed mechanical treatment (jet/brush/surge/airlift) of EW1B and EW2 and chemical treatment (NuWell acid) of EW1B; Cleaned (flush/snake) EW1B and EW2 discharge lines; Cleaned, inspected, and re-installed pump in EW1B; Replaced pump in EW2.	Stevens Drilling and Environmental Services
08/20/2015	Landfill Cap	Routine Landfill Cap Mowing	Mowed the landfill cap.	GHD (M. Barnes/ B. Lardy)
11/19/2015	Dewatering Sump	Routine Maintenance	Removed drop-out strainer, cleaned out debris and reinstalled.	GHD (M. Richie)
11/30/15 - 12/03/2015	EW1B and EW2	Routine Well Rehabilitation	Performed mechanical treatment (jet/brush/surge/airlift) of EW1B and EW2 and chemical treatment (NuWell acid) of EW2; Cleaned (flush/snake) EW1B and EW2 discharge lines; Cleaned, inspected, and re-installed pumps in EW1B and EW2.	Stevens Drilling and Environmental Services
12/01/2015	Dewatering Sump	Decreased Pump Functionality	Replaced pump.	Stevens Drilling and Environmental Services
12/04/2015	EW1B	Well Repair	Repaired hole found in the top of the screen at EW1B by installing a 10-foot long, 4-inch diameter, #10 slotted screen and K-Packer within the existing 6-inch diameter screen; Redeveloped EW1B.	Stevens Drilling and Environmental Services

Table 4.1

Historical Groundwater Sampling Event Summary
Highway 96 Site
White Bear Township, Minnesota

Round	Date	Sampled By	Description
1	January 1986	USEPA	Samples from monitoring and residential wells
2	June 1987	CRA	Samples from leachate, monitoring and residential wells
3	January 1988	CRA	Samples from leachate, monitoring and residential wells
4	August 1988	CRA	Samples from leachate, monitoring and residential wells
5	March 1989	CRA	Samples from leachate, monitoring and residential wells
6	July 1989	CRA	Samples from leachate, monitoring and residential wells
7	October 1989	CRA	Samples from leachate, monitoring and residential wells
8	January 1990	CRA	Samples from leachate, monitoring and residential wells
9	May 1990	CRA	Samples from leachate, monitoring and residential wells
10	September 1990	CRA	Samples from leachate, monitoring and residential wells
11	December 1990	CRA	Samples from leachate, monitoring and residential wells
12	March 1991	CRA	Samples from leachate, monitoring and residential wells
13	June 1991	CRA	Samples from leachate, monitoring and residential wells
14	December 1991	CRA	Samples from leachate, monitoring and residential wells
15	May 1992	CRA	Samples from leachate, monitoring and residential wells
16	November 1992	CRA	Samples from leachate, monitoring and residential wells
17	May 1993	CRA	Samples from leachate, monitoring and residential wells
18	October 1993	CRA	Samples from leachate, monitoring and residential wells
19	January 1994	CRA	Samples from residential wells
20	April 1994	CRA	Samples from residential wells
21	May 1994	CRA	Samples from residential wells
22	August 1994	CRA	Samples from leachate and monitoring wells
23	November 1994	CRA	Samples from residential wells
24	December 1994	CRA	Samples from leachate, monitoring and residential wells
25	May 1995	CRA	Samples from leachate, monitoring and residential wells
26	October 1995	CRA	Samples from leachate, monitoring and residential wells
27	May 1996	CRA	Samples from leachate and monitoring wells
28	October 1996	CRA	Samples from leachate, monitoring and residential wells
29	May 1997	CRA	Samples from leachate and monitoring wells
30	October 1997	CRA	Samples from leachate, monitoring and residential wells
31	May 1998	CRA	Samples from leachate and monitoring wells
32	October 1998	CRA	Samples from leachate, monitoring and residential wells
33	October/November 1999	CRA	Samples from compliance point (pilot study), leachate, monitoring and residential wells
34	January/February 2000	CRA	Samples from compliance point wells
35	October 2000	CRA	Samples from leachate, monitoring and residential wells
36	November 2001	CRA	Samples from leachate, monitoring and residential wells
37	October 2002	CRA	Samples from leachate, monitoring and residential wells
38	October 2003	CRA	Samples from leachate, monitoring and residential wells

Table 4.1

Historical Groundwater Sampling Event Summary
Highway 96 Site
White Bear Township, Minnesota

Round	Date	Sampled By	Description
39	October 2004	CRA	Samples from leachate, monitoring and residential wells
40	January 2005	CRA	Samples from residential wells
41	February 2005	CRA/MPCA	Samples from residential wells
42	March 2005	CRA/MPCA	Samples from residential wells
43	April 2005	MPCA	Samples from residential wells
44	May 2005	CRA/MPCA	Samples from residential wells
45	June 2005	CRA/MPCA	Samples from residential wells
46	August 2005	CRA/MPCA	Samples from residential wells
47	October 2005	CRA	Samples from select monitoring wells
48	November 2005	CRA/MPCA	Samples from leachate, monitoring and residential wells
49	December 2005	CRA	Samples from select monitoring wells
50	January 2006	CRA	Samples from select monitoring wells
51	February 2006	CRA/MPCA	Samples from residential wells
52	May 2006	CRA/MPCA	Samples from residential wells
53	October 2006	CRA/MPCA	Samples from leachate, monitoring and residential wells
54	November 2006	CRA	Samples from select monitoring wells
55	January 2007	CRA	Samples from select monitoring wells
56	April 2007	CRA/MPCA	Samples from residential wells
57	October 2007	CRA/MPCA	Samples from leachate, monitoring and residential wells
58	April/May 2008	CRA/MPCA	Samples from residential wells
59	September 2008	CRA	Samples from select monitoring wells
60	October/November 2008	CRA/MPCA	Samples from leachate, monitoring and residential wells
61	April 2009	CRA/MPCA	Samples from residential wells
62	October 2009	CRA/MPCA	Samples from leachate, monitoring and residential wells
63	April 2010	CRA/MPCA	Samples from residential wells
64	October 2010	CRA/MPCA	Samples from leachate, monitoring and residential wells
65	April 2011	CRA/MPCA	Samples from residential wells
66	October 2011	CRA/MPCA	Samples from leachate, monitoring and residential wells
67	April/May 2012	CRA/MPCA	Samples from residential wells
68	October 2012	CRA/MPCA	Samples from leachate, monitoring and residential wells
69	May 2013	CRA/MPCA	Samples from residential wells
70	September/October 2013	CRA/MPCA	Samples from leachate, monitoring and residential wells
71	April 2014	CRA/MPCA	Samples from residential wells
72	September/October 2014	CRA/MPCA	Samples from leachate, monitoring and residential wells
73	April 2015	CRA/MPCA	Samples from residential wells
74	October 2015	GHD/MPCA	Samples from leachate, monitoring and residential wells

Table 4.2

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Perched Groundwater Unit)
Highway 96 Site
White Bear Township, Minnesota

Location	Date		Chemical Oxygen Demand mg/L	Chloride mg/L	pH -	Solids, Total Suspended mg/L	1,1-Dichloroethane ug/L	1,2-Dichloroethane ug/L	Acetone ug/L	Benzene ug/L	Chloroethane ug/L	Chloroform ug/L	cis-1,2-Dichloroethene ug/L	Dichlorodifluoromethane ug/L	Dichlorofluoromethane ug/L
On-Site Monitoring Wells															
Dewatering Sump	01/07/15		NA	NA	NA	NA	1 J	< 1.4	< 14	2.6	13	< 1.4	0.8	0.7 J	0.5 J
Dewatering Sump	06/10/15		NA	NA	NA	NA	1.3	0.6 J	< 10	2.4	8.8	0.5 J	0.8	0.6 J	0.4 J
Dewatering Sump	08/05/15		NA	NA	NA	NA	1.5	0.6 J	< 10	3.3	12	< 1	0.8	0.9 J	0.5 J
Dewatering Sump	10/08/15		30	94	7.6	5	1.2	0.6 J	< 10	2.9	8.9	< 1	0.9	0.9 J	0.6 J
LW1	10/09/15		NA	15	NA	NA	0.3 J	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
LW2	10/09/15		NA	6.8	NA	NA	0.4 J	< 1	6.8 J	1.7	4	< 1	0.3 J	< 1	< 1
LW3	10/09/15		NA	46	NA	NA	1.1	0.5 J	< 10	1.3	0.8 J	< 1	0.3 J	6.5	1
MW1S	10/09/15		NA	19	NA	NA	< 1	< 1	2.2 J	< 1	< 1	< 1	< 0.5	< 1	< 1
MW4U	10/08/15		NA	150	NA	NA	59	2.2 J	< 25	3.4	54	< 2.5	47	< 2.5	< 2.5

Table 4.2

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Perched Groundwater Unit)
Highway 96 Site
White Bear Township, Minnesota

Location	Date		Ethyl ether ug/L	Ethylbenzene ug/L	Isopropylbenzene ug/L	Methyl ethyl ketone ug/L	Methyl isobutyl ketone ug/L	Methylene chloride ug/L	Toluene ug/L	trans-1,2-Dichloroethene ug/L	Trichloroethene ug/L	Vinyl chloride ug/L	Xylenes, Total ug/L	Total VOCs ug/L
On-Site Monitoring Wells														
Dewatering Sump	01/07/15		< 2.9	8.9	< 1.4	< 14	< 14	< 1.4	1.2 J	1	< 1.4	21	4.2	54.9
Dewatering Sump	06/10/15		< 2	8.8	0.5 J	< 10	< 10	< 1	1.9	1.1	0.3 J	24	7.7	59.7
Dewatering Sump	08/05/15		< 2	12	0.7 J	< 10	< 10	< 1	2.5	1.3	0.3 J	26	11	73.4
Dewatering Sump	10/08/15		< 2	9.6	0.6 J	< 10	< 10	< 1	1.4	1	< 1	24	4.9	57.5
LW1	10/09/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	0.3 J	< 1	< 1	0.56
LW2	10/09/15		< 2	< 1	< 1	0.6 J	< 10	< 1	0.7 J	0.4 J	< 1	< 1	< 1	14.9
LW3	10/09/15		0.7 J	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	0.3 J	< 1	< 1	12.6
MW1S	10/09/15		< 2	< 1	< 1	0.7 J	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	2.91
MW4U	10/08/15		< 5	< 2.5	< 2.5	< 25	< 25	< 2.5	2.2 J	3.3	2.8	42	4.7	221

Notes:

J - Estimated Result
NA - Not Analyzed

Table 4.3

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Lower Sand Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Chemical Oxygen Demand -- mg/L	Chloride -- mg/L	pH -- -	Solids, Total Suspended -- mg/L	1,1-Dichloroethane 70 ug/L	1,2-Dichloroethane 4 ug/L	Acetone 700 ug/L	Benzene 5 ug/L	Chloroethane -- ug/L	Chloroform 60 ug/L	cis-1,2-Dichloroethene 70 ug/L	Dichlorodifluoromethane 1000 ug/L	Dichlorofluoromethane -- ug/L
On-Site Monitoring Wells															
EW1B	01/07/15		NA	NA	NA	NA	4.5	< 2.5	< 25	< 2.5	2.9	< 2.5	7.6	2.3 J	1.6 J
EW1B	06/10/15		NA	NA	NA	NA	5.1	< 2.5	< 25	< 2.5	2.3 J	< 2.5	9	1.9 J	1.7 J
EW1B	08/05/15		NA	NA	NA	NA	4.6	< 2	< 20	< 2	2.3	< 2	8.8	2.1	1.5 J
EW1B	10/08/15		11	49	6.9	25	5.3	< 2.5	< 25	< 2.5	2.3 J	< 2.5	9.1	2.3 J	1.9 J
MW1D	10/08/15		NA	33	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	4.3	1.4
MW4S	10/08/15		NA	100	NA	NA	58	1.9 J	< 33	2 J	59	< 3.3	40	< 3.3	< 3.3
MW4D	10/08/15		NA	350	NA	NA	100	13	< 67	4.8 J	120	< 6.7	7.5	2.8 J	6.3 J
MW10D	10/08/15		NA	18	NA	NA	< 1	< 1	4.6 J	< 1	< 1	< 1	< 0.5	< 1	< 1
MW11D	10/09/15		NA	36	NA	NA	0.7 J	< 1	< 10	< 1	< 1	< 1	0.4 J	< 1	< 1
Compliance Monitoring Wells															
MW12D	10/07/15		NA	11	NA	NA	0.3 J	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
MW13D	10/07/15		NA	63	NA	NA	1.8	< 1	< 10	< 1	< 1	< 1	0.8	< 1	< 1
MW16D	10/07/15		NA	45	NA	NA	0.5 J	< 1	< 10	< 1	0.6 J	< 1	< 0.5	< 1	0.3 J

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Lower Sand Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Ethyl ether 1000 ug/L	Ethylbenzene 700 ug/L	Isopropylbenzene 300 ug/L	Methyl ethyl ketone 4000 ug/L	Methyl isobutyl ketone 300 ug/L	Methylene chloride 5 ug/L	Toluene 1000 ug/L	trans-1,2-Dichloroethene 100 ug/L	Trichloroethene 5 ug/L	Vinyl chloride 2 ug/L	Xylenes, Total 10000 ug/L	Total VOCs -- ug/L
On-Site Monitoring Wells														
EW1B	01/07/15		< 5	< 2.5	< 2.5	< 25	< 25	< 2.5	< 2.5	< 1.3	66	5.6	< 2.5	90.5
EW1B	06/10/15		< 5	< 2.5	< 2.5	< 25	< 25	< 2.5	< 2.5	< 1.3	70	5.2	< 2.5	95.2
EW1B	08/05/15		< 4	< 2	< 2	< 20	< 20	< 2	< 2	< 1	70	4.8	< 2	94.1
EW1B	10/08/15		< 5	< 2.5	< 2.5	< 25	< 25	< 2.5	< 2.5	< 1.3	71	6.1	< 2.5	98
MW1D	10/08/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	5.7
MW4S	10/08/15		< 6.7	< 3.3	< 3.3	< 33	< 33	< 3.3	1 J	2.2	1.1 J	100	< 3.3	265.2
MW4D	10/08/15		< 13	< 6.7	< 6.7	< 67	< 67	6.2 J	5.3 J	< 3.3	< 6.7	16	< 6.7	281.9
MW10D	10/08/15		< 2	< 1	< 1	< 10	1.5 J	< 1	< 1	< 0.5	< 1	< 1	< 1	6.1
MW11D	10/09/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	1.05
Compliance Monitoring Wells														
MW12D	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	0.3
MW13D	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	2.56
MW16D	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	1.39

Notes:

[1] - Site Cleanup Goals (SCGs) apply to compliance monitoring wells only.

Shaded results exceed SCGs, where applicable.[1]

-- No SCG established

J - Estimated Result

NA - Not Analyzed

Table 4.4

2015 Groundwater Analytical Data Detections - Monitoring Wells
(St. Peter Sandstone Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Chemical Oxygen Demand - mg/L	Chloride - mg/L	pH - -	Solids, Total Suspended - mg/L	1,1-Dichloroethane 70 ug/L	1,2-Dichloroethane 4 ug/L	Acetone 700 ug/L	Benzene 5 ug/L	Chloroethane - ug/L	Chloroform 60 ug/L	cis-1,2-Dichloroethene 70 ug/L	Dichlorodifluoromethane 1000 ug/L	Dichlorofluoromethane - ug/L
On-Site Monitoring Wells															
EW2	01/07/15		NA	NA	NA	NA	13	1 J	< 10	0.6 J	13	< 1	8.4	5.7	11
EW2	06/10/15		NA	NA	NA	NA	12	0.9 J	< 10	0.5 J	9.6	< 1	8.6	5.4	10
EW2	08/05/15		NA	NA	NA	NA	14	0.9 J	< 10	0.7 J	8.9	< 1	12	7.2	9.8
EW2	10/08/15		11	46	7	20	14	0.9 J	< 10	0.6 J	10	< 1	11	6.9	10
MW8B	10/08/15		NA	54	NA	NA	0.4 J	0.4 J	< 10	< 1	3.3	< 1	0.4 J	5	3.3
Compliance Monitoring Wells															
MW10B	10/08/15		NA	1.1	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
MW10B	10/08/15	D	NA	1.1	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
MW12B	10/07/15		NA	59	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
MW13B	10/07/15		NA	30	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	< 1	< 1
MW16B	10/07/15		NA	11	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	1.5	0.5 J
MW16B	10/07/15	D	NA	11	NA	NA	< 1	< 1	< 10	< 1	< 1	< 1	< 0.5	1.5	0.5 J

2015 Groundwater Analytical Data Detections - Monitoring Wells
(St. Peter Sandstone Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Chemical Oxygen Demand - mg/L	Chloride - mg/L	pH - -	Solids, Total Suspended - mg/L	1,1-Dichloroethane 70 ug/L	1,2-Dichloroethane 4 ug/L	Acetone 700 ug/L	Benzene 5 ug/L	Chloroethane - ug/L	Chloroform 60 ug/L	cis-1,2-Dichloroethene 70 ug/L	Dichlorodifluoromethane 1000 ug/L	Dichlorofluoromethane - ug/L
Converted Residential Monitoring Wells															
6 Blue Goose Lane	10/07/15		NA	9.4	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
1 Lily Pond Road	10/07/15		NA	18	NA	NA	7.4	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	3.6	2.1
11 Lily Pond Road	10/06/15		NA	3.9	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
11 Robb Farm Road	10/07/15		NA	17	NA	NA	0.5 J	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Off-Site Monitoring Wells															
EW3	10/05/15		NA	7.7	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW17A	10/06/15		NA	62	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW17B	10/06/15		NA	32	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW18A	10/06/15		NA	72	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW18B	10/06/15		NA	34	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW18B	10/06/15	D	NA	33	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW19A	10/05/15		NA	76	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW19B	10/05/15		NA	19	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW20B	10/05/15		NA	13	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW21A	10/05/15		NA	4.3	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW21A	10/05/15	D	NA	4.2	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5

2015 Groundwater Analytical Data Detections - Monitoring Wells
(St. Peter Sandstone Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Ethyl ether 1000 ug/L	Ethylbenzene 700 ug/L	Isopropylbenzene 300 ug/L	Methyl ethyl ketone 4000 ug/L	Methyl isobutyl ketone 300 ug/L	Methylene chloride 5 ug/L	Toluene 1000 ug/L	trans-1,2-Dichloroethene 100 ug/L	Trichloroethene 5 ug/L	Vinyl chloride 2 ug/L	Xylenes, Total 10000 ug/L	Total VOCs - ug/L
On-Site Monitoring Wells														
EW2	01/07/15		< 2	< 1	< 1	< 10	< 10	0.3 J	1.1	< 0.5	1.7	7.8	< 1	64
EW2	06/10/15		< 2	< 1	< 1	< 10	< 10	0.4 J	1.1	< 0.5	1.7	7.4	< 1	58
EW2	08/05/15		< 2	< 1	< 1	< 10	< 10	0.4 J	1.2	< 0.5	2.3	8.8	< 1	66
EW2	10/08/15		< 2	< 1	< 1	< 10	< 10	< 1	0.99 J	< 0.5	2.6	9.3	< 1	66
MW8B	10/08/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	0.4 J	< 1	13
Compliance Monitoring Wells														
MW10B	10/08/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	ND
MW10B	10/08/15	D	< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	ND
MW12B	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	ND
MW13B	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	ND
MW16B	10/07/15		< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	2
MW16B	10/07/15	D	< 2	< 1	< 1	< 10	< 10	< 1	< 1	< 0.5	< 1	< 1	< 1	2

Table 4.4

2015 Groundwater Analytical Data Detections - Monitoring Wells
(St. Peter Sandstone Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	SCG [1] Date		Ethyl ether 1000 ug/L	Ethylbenzene 700 ug/L	Isopropylbenzene 300 ug/L	Methyl ethyl ketone 4000 ug/L	Methyl isobutyl ketone 300 ug/L	Methylene chloride 5 ug/L	Toluene 1000 ug/L	trans-1,2-Dichloroethene 100 ug/L	Trichloroethene 5 ug/L	Vinyl chloride 2 ug/L	Xylenes, Total 10000 ug/L	Total VOCs -- ug/L
Converted Residential Monitoring														
6 Blue Goose Lane	10/07/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
1 Lily Pond Road	10/07/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	13
11 Lily Pond Road	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
11 Robb Farm Road	10/07/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	0.5
Off-Site Monitoring Wells														
EW3	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW17A	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW17B	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	0.3	< 1	0.3
MW18A	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW18B	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW18B	10/06/15	D	< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW19A	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW19B	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW20B	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW21A	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW21A	10/05/15	D	< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND

Notes:

[1] - Site Cleanup Goals (SCGs) apply to compliance monitoring wells only.
Shaded results exceed SCGs, where applicable. [1]
-- - No SCG established
D - Duplicate Sample

J - Estimated Result
NA - Not Analyzed
ND - Not Detected

Table 4.5

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Prairie Du Chien Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	Date		Chemical Oxygen Demand mg/L	Chloride mg/L	pH -	Solids, Total Suspended mg/L	1,1-Dichloroethane ug/L	1,2-Dichloroethane ug/L	Acetone ug/L	Benzene ug/L	Chloroethane ug/L	Chloroform ug/L	cis-1,2-Dichloroethene ug/L	Dichlorodifluoromethane ug/L	Dichlorofluoromethane ug/L
Off-Site Monitoring Wells															
MW17L	10/06/15		NA	10	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW18L	10/06/15		NA	17	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
MW19L	10/05/15		NA	15	NA	NA	< 0.5	< 0.5	< 10	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5

Table 4.5

2015 Groundwater Analytical Data Detections - Monitoring Wells
(Prairie Du Chien Aquifer)
Highway 96 Site
White Bear Township, Minnesota

Location	Date		Ethyl ether ug/L	Ethylbenzene ug/L	Isopropylbenzene ug/L	Methyl ethyl ketone ug/L	Methyl isobutyl ketone ug/L	Methylene chloride ug/L	Toluene ug/L	trans-1,2-Dichloroethene ug/L	Trichloroethene ug/L	Vinyl chloride ug/L	Xylenes, Total ug/L	Total VOCs ug/L
Off-Site Monitoring Wells														
MW17L	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	1.2	< 0.5	< 0.2	< 0.2	< 1	1.2
MW18L	10/06/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND
MW19L	10/05/15		< 0.5	< 0.5	< 0.5	< 10	< 10	< 0.5	< 0.5	< 0.5	< 0.2	< 0.2	< 1	ND

Notes:

NA - Not Analyzed
ND - Not Detected

2015 Groundwater Analytical Detections - Residential Wells
Highway 96 Site
White Bear Township, Minnesota

Location	MDH HBG Basis / Date		Chloride -- -- mg/L	1,1-Dichloroethane 80 RAA ug/L	cis-1,2-Dichloroethene 6 HBV ug/L	Dichlorodifluoromethane 700 HRL ug/L	Dichlorofluoromethane 30 RAA ug/L	Total VOCs - - ug/L
1 Birch Lane	10/05/15		6	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Birch Lane	10/05/15		14	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Birch Lane	10/05/15		5.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Buffalo Road	10/06/15		30.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Buffalo Road	10/06/15	D	30.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Buffalo Road	04/22/15		24.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Buffalo Road	10/06/15		33.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Cardinal	10/07/15		23.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
9 Duck Pass Road	10/08/15		36.3	0.65	< 0.5	0.79	< 0.5	1.44
11 Duck Pass Road	10/07/15		102	< 0.5	< 0.5	< 0.5	< 0.5	ND
13 Duck Pass Road	10/07/15		23.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
15 Duck Pass Road	10/07/15		24.2	< 0.5	< 0.5	< 0.5	< 0.5	ND
20 Duck Pass Road	10/08/15		42.4	0.62	< 0.5	1.1	0.6	2.32
22 Duck Pass Road	10/07/15		42.8	1.8	< 0.5	1.8	0.96	4.56
24 Duck Pass Road	10/07/15		7.7	< 0.5	< 0.5	< 0.5	< 0.5	ND
26 Duck Pass Road	10/07/15		28.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
28 Duck Pass Road	10/07/15		64.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Eagle Ridge Road	04/22/15		17.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Eagle Ridge Road	10/06/15		17.2	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Eagle Ridge Road	04/24/15		32	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Eagle Ridge Road	10/06/15		33.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Eagle Ridge Road	04/22/15		25.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Eagle Ridge Road	04/22/15	D	26	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Eagle Ridge Road	10/06/15		25.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 Eagle Ridge Road	04/22/15		56.7	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 Eagle Ridge Road	10/06/15		59.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 Eagle Ridge Road	10/07/15		14.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
32 East Oaks Road	10/07/15		30.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
36 East Oaks Road	10/07/15		23	< 0.5	< 0.5	< 0.5	< 0.5	ND
38 East Oaks Road	10/05/15		2	< 0.5	< 0.5	< 0.5	< 0.5	ND
50 East Oaks Road	04/27/15		33.2	0.2 J	0.14 J	< 0.5	< 0.5	0.34
50 East Oaks Road	10/07/15		39.5	< 0.5	0.14 J	< 0.5	< 0.5	0.14
1 Gadwall	10/07/15		31.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Gadwall	10/07/15		26.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Gadwall	10/07/15	D	26.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Gadwall	10/07/15		24.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Gadwall	10/07/15		34.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Heron Lane New	10/05/15		17.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Mallard Lane	10/08/15		15.7	< 0.5	< 0.5	< 0.5	< 0.5	ND
5 Mallard Lane	10/08/15		2.4	< 0.5	< 0.5	< 0.5	< 0.5	ND

2015 Groundwater Analytical Detections - Residential Wells
Highway 96 Site
White Bear Township, Minnesota

Location	MDH HBG Basis / Date		Chloride -- -- mg/L	1,1-Dichloroethane 80 RAA ug/L	cis-1,2-Dichloroethene 6 HBV ug/L	Dichlorodifluoromethane 700 HRL ug/L	Dichlorofluoromethane 30 RAA ug/L	Total VOCs -- -- ug/L
6 Mallard Lane	10/08/15		2.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
7 Mallard Lane	10/08/15		9.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Poplar Lane	10/07/15		1.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Poplar Lane	10/07/15	D	1.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Poplar Lane	10/07/15		23.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Poplar Lane	10/07/15		22.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 Poplar Lane	10/07/15		5	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 Poplar Lane	04/22/15		42.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 Poplar Lane	10/07/15		34.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 Poplar Lane	04/22/15		15.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 Poplar Lane	10/05/15		15.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Quail Lane	10/06/15		28.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Quail Lane	04/24/15		22.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Quail Lane	10/06/15		23.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Quail Lane	10/06/15	D	23.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Robb Farm Road	10/08/15		1	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 Robb Farm Road	10/08/15		14.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
35 Robb Farm Road	10/05/15		52.2	< 0.5	< 0.5	< 0.5	< 0.5	ND
35 Robb Farm Road	10/05/15	D	52.2	< 0.5	< 0.5	< 0.5	< 0.5	ND
37 Robb Farm Road	10/05/15		6.7	< 0.5	< 0.5	< 0.5	< 0.5	ND
41 Robb Farm Road	10/05/15		3.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
43 Robb Farm Road	10/05/15		27.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
44 Robb Farm Road	10/07/15		29.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
45 Robb Farm Road	10/05/15		23.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Ski Lane	04/22/15		31.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Ski Lane	10/06/15		34.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 Ski Lane	04/22/15		29.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 Ski Lane	10/06/15		27.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 Ski Lane	04/22/15		17.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 Ski Lane	10/06/15		21.3	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 Ski Lane	04/22/15		27	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 Ski Lane	10/06/15		28.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
12 Ski Lane	04/22/15		20.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
12 Ski Lane	10/07/15		41.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
14 Ski Lane	04/22/15		21.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
14 Ski Lane	10/06/15		31.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
16 Ski Lane	04/22/15		28.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
16 Ski Lane	10/06/15		31.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Thompson Lane	04/21/15		33	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 Thompson Lane	10/06/15		31	< 0.5	< 0.5	1.0	< 0.5	1.0

2015 Groundwater Analytical Detections - Residential Wells
Highway 96 Site
White Bear Township, Minnesota

Location	MDH HBG Basis / Date		Chloride -- -- mg/L	1,1-Dichloroethane 80 RAA ug/L	cis-1,2-Dichloroethene 6 HBV ug/L	Dichlorodifluoromethane 700 HRL ug/L	Dichlorofluoromethane 30 RAA ug/L	Total VOCs - - ug/L
3 Thompson Lane	04/22/15		26.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Thompson Lane	04/22/15	D	26.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 Thompson Lane	10/06/15		50.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
4 Thompson Lane	10/06/15		103	< 0.5	< 0.5	< 0.5	< 0.5	ND
1 West Shore Road	10/05/15		41.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
2 West Shore Road	10/05/15		47.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
3 West Shore Road	10/05/15		5.1	< 0.5	< 0.5	< 0.5	< 0.5	ND
5 West Shore Road	10/05/15		7.5	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 West Shore Road	10/05/15		5	< 0.5	< 0.5	< 0.5	< 0.5	ND
6 West Shore Road	10/05/15	D	5	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 West Shore Road	04/27/15		6.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 West Shore Road	04/27/15	D	6.8	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 West Shore Road	10/07/15		6.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
8 West Shore Road	10/07/15	D	6.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
9 West Shore Road	04/22/15		30.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
9 West Shore Road	10/05/15		20	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 West Shore Road	04/22/15		26.6	< 0.5	< 0.5	< 0.5	< 0.5	ND
10 West Shore Road	10/05/15		26.9	< 0.5	< 0.5	< 0.5	< 0.5	ND
11 West Shore Road	04/22/15		31.7	< 0.5	< 0.5	< 0.5	< 0.5	ND
11 West Shore Road	10/05/15		40.9	< 0.5	0.13 J	< 0.5	< 0.5	0.13
15 West Shore Road	04/22/15		37.4	< 0.5	< 0.5	< 0.5	< 0.5	ND
15 West Shore Road	10/05/15		33.7	< 0.5	< 0.5	< 0.5	< 0.5	ND

Notes:

MDH HBG - Health Based Guidance (HBG) established by the Minnesota Department of Health (MDH); if multiple HBG criteria are available, the lowest criterion is used for screening purposes.)
HBV - Health Based Value
HRL - Health Risk Limit (promulgated)
RAA - Risk Assessment Advice
-- - No HBG Established
D - Duplicate
J - Estimated
ND - Not Detected

Table 5.1

Historical MSA Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

Probe	Date	Pressure (in. w.c.)	% Combustible Gas w/charcoal	% Combustible Gas w/o charcoal
GP1	05/19/1995	NM	10.0	NM
	06/29/1995	0.0	35.0	25.0
	09/06/1995	0.0	NM	16.0
	11/16/1995	NM	11.0	9.0
	05/20/1996	0.0	50.0	50.0
	08/09/1996	0.0	NM	32.0
	10/11/1996	0.0	25.0	32.0
	06/06/1997	0.0	30.0	34.0
	09/18/1997	0.0	70.0	71.0
	11/25/1997	NM	54.0	54.0
	05/18/1998	0.0	54.0	56.0
	09/23/1998	0.0	48.0	58.0
	10/26/1998	0.0	68.0	58.0
	04/08/1999	0.0	24.0	36.0
	07/16/1999	0.0	16.0	12.0
	11/02/1999	0.0	1.1	4.6
	06/30/2000	0.0[(1)]	56.0	44.0
	09/21/2000	0.0[(1)]	0.0	0.0
	01/05/2001	0.2[(1)]	57.0	54.0
GP2	05/19/1995	NM	45.0	NM
	06/29/1995	0.0	42.0	30.0
	09/06/1995	0.0	NM	48.0
	11/16/1995	NM	50.0	50.0
	05/20/1996	0.0	32.0	40.0
	08/09/1996	0.0	NM	24.0
	10/11/1996	0.0	13.0	20.0
	06/06/1997	0.0	17.0	24.0
	09/18/1997	0.0	54.0	70.0
	11/25/1997	NM	25.0	34.0
	05/18/1998	0.0	29.0	35.0
	09/23/1998	0.0	4.4	2.6
	10/26/1998	0.0	3.8	22.0
	04/08/1999	0.0	0.0	0.0
	07/16/1999	0.0	15.0	16.0
	11/02/1999	0.0	2.0	3.6
	06/30/2000	0.4[(1)]	12.0	8.0
	09/21/2000	0.0[(1)]	5.0	9.0
	01/05/2001	0.0[(1)]	32.0	32.0

Table 5.1

Historical MSA Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

Probe	Date	Pressure (in. w.c.)	% Combustible Gas w/charcoal	% Combustible Gas w/o charcoal
GP3	05/19/1995	NM	76.0	NM
	06/29/1995	0.0	70.0	70.0
	09/06/1995	0.0	NM	78.0
	11/16/1995	NM	72.0	72.0
	05/20/1996	0.0	82.0	82.0
	08/09/1996	0.0	NM	85.0
	10/11/1996	0.0	75.0	75.0
	06/06/1997	0.0	8.0	14.0
	09/18/1997	0.0	90.0	90.0
	11/25/1997	NM	93.0	93.0
	05/18/1998	0.0	80.0	84.0
	09/23/1998	0.0	78.0	90.0
	10/26/1998	0.0	88.0	88.0
	04/08/1999	0.0	100*	110*
	07/16/1999	0.0	0.0	0.0
	11/02/1999	0.0	9.0	11.0
	06/30/2000	0.1(1)	23.0	22.0
	09/21/2000	0.0(1)	0.0	0.0
	01/05/2001	0.1(1)	38.0	36.0
GP4	05/19/1995	NM	79.0	NM
	06/29/1995	>5	54.0	40.0
	09/06/1995	>5	NM	72.0
	11/16/1995	NM	80.0	82.0
	05/20/1996	1.0	40.0	40.0
	08/09/1996	0.0	NM	28.0
	10/11/1996	0.0	72.0	74.0
	06/06/1997	0.0	0.3	0.8
	09/18/1997	0.0	63.0	78.0
	11/25/1997	NM	83.0	85.0
	05/18/1998	0.0	30.0	44.0
	09/23/1998	0.0	26.0	26.0
	10/26/1998	0.0	44.0	40.0
	04/08/1999	0.0	8.0	0.0
	07/16/1999	0.0	0.0	0.0
	11/02/1999	0.0	0.3	0.9
	06/30/2000	0.0(1)	0.0	0.0
	09/21/2000	0.1(1)	0.0	0.0
	01/05/2001	0.0(1)	52.0	56.0

Table 5.1

Historical MSA Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

Probe	Date	Pressure (in. w.c.)	% Combustible Gas w/charcoal	% Combustible Gas w/o charcoal
GP5	05/19/1995	NM	82.0	NM
	06/29/1995	0.0	80.0	80.0
	09/06/1995	0.0	NM	88.0
	11/16/1995	NM	80.0	80.0
	05/20/1996	0.0	82.0	82.0
	08/09/1996	0.0	NM	29.0
	10/11/1996	0.0	46.0	46.0
	06/06/1997	0.0	16.0	28.0
	09/18/1997	0.0	33.0	34.0
	11/25/1997	NM	50.0	52.0
	05/18/1998	0.0	40.0	42.0
	09/23/1998	0.0	30.0	32.0
	10/26/1998	0.0	24.0	28.0
	04/08/1999	0.0	102*	140*
	07/16/1999	0.0	10.0	0.0
	11/02/1999	0.0	0.0	0.0
	06/30/2000	0.0[(1)]	33.0	32.0
	09/21/2000	0.0[(1)]	0.0	0.0
	01/05/2001	0.0[(1)]	45.0	42.0
GP6	05/19/1995	NM	0.5	NM
	06/29/1995	0.0	5.7	4.5
	09/06/1995	0.0	NM	50.0
	11/16/1995	NM	18.0	18.0
	05/20/1996	0.0	30.0	35.0
	08/09/1996	0.0	NM	0.0
	10/11/1996	0.0	8.0	9.0
	06/06/1997	0.0	0.0	0.0
	09/18/1997	0.0	1.5	1.6
	11/25/1997	NM	39.0	40.0
	05/18/1998	0.0	47.0	52.0
	09/23/1998	0.0	1.5	1.4
	10/26/1998	0.0	0.0	0.0
	04/08/1999	0.0	19.0	30.0
	07/16/1999	0.0	0.0	0.0
	11/02/1999	0.0	0.0	0.0
	06/30/2000	0.0[(1)]	32.0	30.0
	09/21/2000	0.0[(1)]	0.0	0.0
	01/05/2001	0.0[(1)]	42.0	40.0

Notes:

* Data point ignored
[(1)] Pressure measured with LandTec GEM 500

Table 5.2

Landtec GEM 500
Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

		LandTec GEM 500 Readings*			
Probe	**Date**	**Pressure (in. H_2O)**	**%CH_4**	**%CO_2**	**%O_2**
GP1	11/02/99	0.0	1.3	17.6	3.5
GP1	06/30/00	0.0	46.3	13.2	5.1
GP1	09/21/00	0.0	3.6	1.4	19.3
GP1	01/05/01	0.2	62.4	12.3	2.3
GP1	05/18/01	0.0	0.0	8.1	6.8
GP1	08/17/01	0.0	0.4	12.4	1.9
GP1	06/17/02	0.0	0.0	7.3	6.0
GP1	11/04/02	0.0	0.0	4.2	14.9
GP1	05/20/03	0.0	0.0	2.5	15.2
GP1	08/13/03	0.0	0.0	18.2	1.7
GP1	04/14/04	0.0	2.0	8.5	7.3
GP1	07/08/04	0.0	0.1	6.1	12.8
GP1	04/27/05	0.0	0.0	2.5	18.9
GP1	07/06/05	0.0	0.0	13.9	7.2
GP1	04/26/06	0.0	0.0	4.6	15.0
GP1	09/20/06	0.0	0.1	8.2	7.4
GP1	06/13/07	0.0	6.3	14.0	2.5
GP1	09/20/07	0.0	31.9	11.2	8.9
GP1	06/12/08	0.0	0.0	10.4	6.5
GP1	08/26/08	0.0	0.0	3.4	16.1
GP1	06/24/09	0.0	2.0	10.5	2.8
GP1	09/17/09	0.0	11.3	4.9	12.9
GP1	04/28/10	0.0	0.0	0.4	19.7
GP1	09/17/10	0.0	0.0	1.0	19.4
GP1	05/04/11	0.0	0.0	0.6	20.4
GP1	09/14/11	0.0	0.0	2.3	18.4
GP1	06/20/12	0.0	0.3	0.2	19.4
GP1	09/19/12	0.0	0.1	1.4	18.3
GP1	05/22/13	0.0	0.4	0.8	20.3
GP1	09/18/13	0.0	3.4	2.4	17.1
GP1	05/29/14	0.1	0.0	0.2	20.1
GP1	09/17/14	0.0	0.0	0.7	20.2
GP1	09/24/15	0.0	0.0	0.9	19.7
GP2	11/02/99	0.0	6.1	14.2	1.0
GP2	06/30/00	0.4	11.0	15.6	0.0
GP2	09/21/00	0.0	10.2	15.9	1.8
GP2	01/05/01	0.0	34.7	8.7	2.5
GP2	05/18/01	0.0	13.6	6.1	6.3
GP2	08/17/01	0.0	14.3	15.7	0.8
GP2	06/17/02	0.0	0.0	2.4	16.9
GP2	11/04/02	0.0	23.2	10.5	4.2
GP2	05/20/03	0.0	0.0	0.5	19.7
GP2	08/13/03	0.0	9.8	0.7	11.4

Table 5.2

Landtec GEM 500
Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

		LandTec GEM 500 Readings*			
Probe	**Date**	**Pressure (in. H_2O)**	**%CH_4**	**%CO_2**	**%O_2**
GP2	04/14/04	0.0	0.0	16.7	2.0
GP2	07/08/04	0.0	0.1	12.6	4.9
GP2	04/27/05	0.0	0.0	1.9	16.2
GP2	07/06/05	0.0	0.3	7.8	6.7
GP2	04/26/06	0.0	0.0	0.9	19.5
GP2	09/20/06	0.0	3.4	8.3	7.7
GP2	06/13/07	0.0	0.1	6.0	15.0
GP2	09/20/07	0.0	15.0	9.1	7.5
GP2	06/12/08	0.0	0.0	6.1	9.9
GP2	08/26/08	0.0	2.9	6.1	7.9
GP2	06/24/09	0.0	8.2	9.4	2.3
GP2	09/17/09	0.0	8.1	3.4	14.3
GP2	04/28/10	0.0	0.0	0.7	19.4
GP2	09/17/10	0.0	3.4	5.4	13.2
GP2	05/04/11	0.0	0.0	0.6	20.4
GP2	09/14/11	0.0	0.0	0.4	20.4
GP2	06/20/12	0.0	0.3	1.5	18.5
GP2	09/19/12	0.0	7.6	11.8	1.8
GP2	05/22/13	0.0	0.2	0.4	20.6
GP2	09/18/13	0.3	0.4	7.5	8.6
GP2	05/29/14	0.0	0.0	0.8	19.6
GP2	09/17/14	0.0	0.0	2.4	17.6
GP2	09/24/15	0.0	0.0	2.9	16.4
GP3	11/02/99	0.0	15.1	0.7	3.8
GP3	06/30/00	0.1	24.6	3.5	0.0
GP3	09/21/00	0.0	0.0	0.0	21.1
GP3	01/05/01	0.1	36.2	2.2	0.0
GP3	05/18/01	-0.1	15.0	3.3	0.4
GP3	08/17/01	0.0	0.0	0.0	20.4
GP3	06/17/02	0.0	34.4	2.9	0.6
GP3	11/04/02	0.0	48.4	2.4	0.2
GP3	05/20/03	0.0	1.4	0.3	19.3
GP3	08/13/03	0.0	12.8	4.4	1.4
GP3	04/14/04	0.0	20.2	0.2	3.8
GP3	07/08/04	0.0	25.5	0.4	3.0
GP3	04/27/05	0.0	0.0	0.0	21.3
GP3	07/06/05	0.0	25.3	3.3	0.1
GP3	04/26/06	0.0	0.0	0.0	20.4
GP3	09/20/06	0.0	0.0	1.4	17.6
GP3	06/13/07	0.0	0.0	0.3	20.8
GP3	09/20/07	0.0	25.0	4.3	3.4
GP3	06/12/08	0.0	12.4	2.1	10.8
GP3	08/26/08	0.0	17.5	1.8	12.5

Table 5.2

Landtec GEM 500
Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

		LandTec GEM 500 Readings*			
Probe	**Date**	**Pressure (in. H_2O)**	**%CH_4**	**%CO_2**	**%O_2**
GP3	06/24/09	0.0	13.6	2.6	2.5
GP3	09/17/09	0.0	19.2	1.5	6.0
GP3	04/28/10	0.0	0.0	0.4	19.6
GP3	09/17/10	0.0	0.0	1.6	17.9
GP3	05/04/11	0.0	0.0	2.5	17.3
GP3	09/14/11	0.0	0.1	1.8	17.6
GP3	06/20/12	0.0	37.4	1.3	2.3
GP3	09/19/12	0.0	43.7	1.1	0.0
GP3	05/22/13	0.0	33.6	2.1	0.9
GP3	09/18/13	0.0	41.8	1.6	0.2
GP3	05/29/14	0.1	57.3	1.7	1.6
GP3	09/17/14	0.0	40.4	2.6	5.2
GP3	09/25/15	0.0	41.1	1.0	6.5
GP4	11/02/99	0.0	20.8	0.3	0.1
GP4	06/30/00	0.0	0.0	0.1	19.8
GP4	09/21/00	0.1	0.0	0.0	21.1
GP4	01/05/01	0.0	73.5	1.5	4.0
GP4	05/18/01	0.0	0.0	0.1	20.0
GP4	08/17/01	0.0	0.1	2.9	15.8
GP4	06/17/02	0.0	0.0	0.0	20.0
GP4	11/04/02	0.0	0.9	0.4	19.8
GP4	05/20/03	0.0	0.0	0.0	20.7
GP4	08/13/03	0.0	0.0	15.4	2.4
GP4	04/14/04	0.0	0.0	6.1	3.5
GP4	07/08/04	0.0	3.0	2.5	7.4
GP4	04/27/05	0.0	0.0	0.0	21.2
GP4	07/06/05	0.0	64.6	3.9	3.3
GP4	04/26/06	0.1	40.2	2.3	9.3
GP4	09/20/06	0.0	0.7	4.8	9.9
GP4	06/13/07	0.0	63.5	3.0	0.3
GP4	09/20/07	0.0	4.5	6.7	3.7
GP4	06/12/08	0.0	0.0	0.0	20.4
GP4	08/26/08	0.0	9.6	20.7	2.8
GP4	06/24/09	0.0	62.5	1.0	0.0
GP4	09/17/09	0.0	34.3	0.9	6.6
GP4	04/28/10	0.0	0.0	0.0	20.2
GP4	09/17/10	0.0	1.1	1.4	18.6

Table 5.2

Landtec GEM 500
Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

		LandTec GEM 500 Readings*			
Probe	**Date**	**Pressure (in. H_2O)**	**%CH_4**	**%CO_2**	**%O_2**
GP4	05/04/11	0.0	0.0	0.2	20.5
GP4	09/14/11	0.0	24.5	7.9	12.9
GP4	06/20/12	0.0	0.3	0.0	20.3
GP4	09/19/12	0.0	4.4	0.8	19.0
GP4	05/22/13	0.0	0.3	0.1	20.7
GP4	09/18/13	0.0	6.2	4.6	9.5
GP4	05/29/14	0.0	0.0	0.0	21.3
GP4	09/17/14	0.0	0.0	0.0	20.3
GP4	09/24/15	0.0	0.0	0.1	20.9
GP5	11/02/99	0.0	3.6	1.0	19.0
GP5	06/30/00	0.0	36.0	5.4	0.0
GP5	09/21/00	0.0	1.4	0.3	20.5
GP5	01/05/01	0.0	43.8	3.2	0.4
GP5	05/18/01	0.0	17.1	2.1	0.4
GP5	08/17/01	0.0	0.0	1.7	15.1
GP5	06/17/02	0.0	33.8	3.0	2.7
GP5	11/04/02	0.0	11.1	1.5	1.1
GP5	05/20/03	0.0	1.8	0.0	19.3
GP5	08/13/03	0.0	0.0	15.9	1.2
GP5	04/14/04	0.0	28.5	0.2	2.9
GP5	07/08/04	0.0	10.7	1.8	4.8
GP5	04/27/05	0.1	0.0	0.0	21.2
GP5	07/06/05	0.0	28.8	3.6	0.1
GP5	04/26/06	0.0	0.0	0.2	19.9
GP5	09/20/06	0.0	0.0	0.4	20.0
GP5	06/13/07	0.0	0.0	0.1	21.2
GP5	09/20/07	0.0	0.0	0.2	20.9
GP5	06/12/08	0.0	0.0	0.0	20.4
GP5	08/26/08	0.0	0.0	1.0	18.2
GP5	06/24/09	0.0	0.0	0.0	19.9
GP5	09/17/09	0.0	0.0	0.2	19.9
GP5	04/28/10	0.0	0.0	0.2	20.1
GP5	09/17/10	0.0	0.0	0.7	19.4
GP5	05/04/11	0.0	0.0	1.1	17.5
GP5	09/14/11	0.0	0.0	0.5	20.2
GP5	06/20/12	0.0	0.1	0.0	20.2
GP5	09/19/12	0.0	0.0	0.1	20.3
GP5	05/22/13	0.0	0.2	0.8	18.4
GP5	09/18/13	0.0	0.0	0.3	20.3
GP5	05/29/14	0.2	0.0	0.8	15.9
GP5	09/17/14	0.0	0.0	1.0	19.2
GP5	09/24/15	0.0	0.0	1.3	18.8

Table 5.2

Landtec GEM 500
Gas Probe Monitoring Results
Highway 96 Site
White Bear Township, Minnesota

		LandTec GEM 500 Readings*			
Probe	**Date**	**Pressure (in. H_2O)**	**%CH_4**	**%CO_2**	**%O_2**
GP6	11/02/99	0.0	0.3	0.3	20.8
GP6	06/30/00	0.0	31.2	6.0	0.0
GP6	09/21/00	0.0	0.0	0.0	21.0
GP6	01/05/01	0.0	40.0	5.1	1.5
GP6	05/18/01	0.0	28.2	3.3	0.4
GP6	08/17/01	0.0	0.0	1.8	17.8
GP6	06/17/02	0.0	0.0	2.6	12.0
GP6	11/04/02	0.0	12.0	1.7	0.3
GP6	05/20/03	0.0	0.0	1.3	15.5
GP6	08/13/03	0.0	0.0	17.4	2.3
GP6	04/14/04	0.0	0.1	16.3	1.1
GP6	07/08/04	0.0	16.4	0.3	2.8
GP6	04/27/05	0.0	0.0	0.6	17.2
GP6	07/06/05	0.0	27.5	3.5	0.1
GP6	04/26/06	0.0	0.0	1.7	17.7
GP6	09/20/06	0.0	0.0	4.3	14.5
GP6	06/13/07	0.0	0.1	6.1	14.2
GP6	09/20/07	0.0	0.1	10.0	3.8
GP6	06/12/08	0.0	16.7	3.0	9.5
GP6	08/26/08	0.0	0.0	5.3	15.6
GP6	06/24/09	0.0	0.0	3.6	15.9
GP6	09/17/09	0.0	0.0	4.5	14.6
GP6	04/28/10	0.0	0.0	2.6	17.1
GP6	09/17/10	0.0	0.0	2.6	17.5
GP6	05/04/11	0.0	0.0	0.7	18.2
GP6	09/14/11	0.0	0.0	1.0	19.7
GP6	06/20/12	0.0	0.2	1.2	17.7
GP6	09/19/12	0.0	0.0	0.5	20.0
GP6	05/22/13	0.0	0.2	0.2	20.5
GP6	09/18/13	0.1	0.0	3.8	14.7
GP6	05/29/14	0.1	0.0	0.3	19.0
GP6	09/17/14	0.0	0.0	3.4	16.7
GP6	09/24/15	0.0	0.0	4.5	14.8

Notes:

* - Readings captured once stabilized, after at least 60 seconds of purging.

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