

Karlene French

From: Karlene French
Sent: Friday, January 7, 2022 12:43 PM
To: Reppe, Thomas (MPCA)
Cc: Grape, Timothy (MPCA); Wolf, Matthias (MPCA); Patrick McGuire; Karah Conklin; Melissa Marietta; Steve Helgen; Brodin, Michelle (michelle.brodin@stinson.com); Damle, Neha; Kane, Allen; James Vondracek; Frame, Thomas W.; Weldon, Bryan; Councilman Reich (kevin.reich@minneapolismn.gov); Bergeon, Mark
Subject: RE: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

Hi Tom,

Thank you to you and Matthias for the quick response to the supplemental information and the prompt review of the annual report. We will proceed with the monitoring plan as approved below and acknowledge and agree with the other comments. We will let you know what the schedule will be for shutting down the well.

Thank you, again. Karlene



Karlene A. French
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120 South 6th Street, Suite 700
Minneapolis, MN 55402

From: Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us>
Sent: Thursday, January 6, 2022 4:36 PM
To: Karlene French <Karlene_French@cpr.ca>
Cc: Grape, Timothy (MPCA) <timothy.grape@state.mn.us>; Wolf, Matthias (MPCA) <matthias.wolf@state.mn.us>; Patrick McGuire <pmcguire@integral-corp.com>; Karah Conklin <kconklin@integral-corp.com>; Melissa Marietta <mmarietta@integral-corp.com>; Steve Helgen <shelgen@integral-corp.com>; Brodin, Michelle (michelle.brodin@stinson.com) <michelle.brodin@stinson.com>; Damle, Neha <Neha_Damle@golder.com>; Kane, Allen <allen_kane@golder.com>; James Vondracek <jevondracek@ashland.com>; Frame, Thomas W. <tom.frame@minneapolismn.gov>; Weldon, Bryan <Bryan_Weldon@golder.com>; Councilman Reich (kevin.reich@minneapolismn.gov) <kevin.reich@minneapolismn.gov>; Bergeon, Mark <Mark_Bergeon@golder.com>
Subject: RE: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

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Karlene,

Minnesota Pollution Control Agency (MPCA) staff have completed a review of the *2020 Annual Report, Overburden Groundwater Extraction and Treatment System, Southeastern Area - East Side Shoreham Facility*, dated October 12, 2021

(Annual Report), prepared by Golder Associates Inc. (Golder) on behalf of Canadian Pacific (CP). Based on the review, MPCA staff approve of the Annual Report and the proposed activities contingent on the incorporation of the following modifications:

1. Section 5, Revised Groundwater Monitoring Plan and Table 6 Proposed Semi-Annual Monitoring Program:

a. The Annual Report states that: "Requested changes to monitoring in MW00-42-T are justified, because cVOC concentrations have been stable since shutdown (varying in a narrow range of 19 ug/L to 30 ug/L over the last 10 years [see Mann-Kendall summary sheet in Appendix A]) and MW04-95-T is within 100 feet of MW00-42-T, which historically has had higher cVOC concentrations." However, based on the Figures included in the Annual Report, wells MW04-95-T and MW00-42-T are more than 300 feet apart. Therefore, justifying changes to the monitoring of MW00-42-T using information from a well more than 300 feet away is speculative and unsubstantiated.

b. The following changes to the proposed monitoring/sampling program in the Annual Report are approved:

Shallow/Till Wells:

- MW00-41-T – water levels only
- MW04-155-T – no monitoring/sampling
- MW04-25-T – no monitoring/sampling
- MW04-31-T – no monitoring/sampling
- MW04-33-T – water levels only
- MW06-01-T – water levels only

Outwash/St. Peter Wells:

- MW03-56-BR – no monitoring/sampling
- MW04-31-SP – water levels only

OPD Wells:

- MW03-61-OPD – water levels only

c. All other changes to the proposed monitoring/sampling program are not approved at this time. Please continue to collect groundwater samples for VOCs and measure water levels at the following wells, based on the following observations and information:

Shallow/Till Wells:

- MW00-42-T: The location of the well is important for determining groundwater flow direction and delineating the plume as it is the only Shallow/Till well remaining south of the GWETS; changes to the proposed monitoring/sampling of the other Shallow/Till wells (MW00-41-T and MW04-31-T) located south of the GWETS are approved (see above). The overall increasing trend of Total CVOC and PCE concentrations in the well after the system start-up, as indicated by the Mann-Kendall trend analysis, is concerning, especially considering the observed variability (fluctuations) in the concentrations. Since the shutdown of the system, the concentrations in the well are among the highest since the system start-up and a decreasing trend is not observed. The purported stable trend in the Total CVOC concentration post-shutdown has a low confidence factor (61.4%), suggesting that a stable trend is not well supported by the sampling results.
- MW04-28-T: The well is the only Shallow/Till well located above where the outwash is in direct contact with the Prairie Du Chien; above the "window" in the St. Peter mudstone (as indicated in Figures 2 and 4 of the Annual Report). Continued monitoring/sampling of the well, along with the nested wells MW04-28-I and MW04-28-OPD, will continue to provide information about the

vertical movement of groundwater and migration of contaminants downgradient of the GWETS and above the window in the St. Peter mudstone. Concentrations of Total CVOC and PCE increased in the well after the system start-up, as indicated by the Mann-Kendall trend analysis. Since the shutdown of the system, the Total CVOC and PCE concentrations have only slightly decreased, and appear to be fluctuating and are among the highest in the well since the system start-up.

Outwash/St. Peter Wells:

- MW04-29-BR: Although the well is listed in the Annual Report as an Outwash/St. Peter well, according to the Minnesota Well Index, the well appears to be screened in the Prairie du Chien, as the final stratigraphic unit is listed as "DOLOMITE". Groundwater flow in the Prairie du Chien is not discussed in the Annual Report. Although concentrations of CVOCs decreased in the well after the system start-up, immediately after the shutdown of the system, the concentrations of some CVOCs increased and no trend in the concentrations is indicated by the Mann-Kendall trend analysis. The detailed (inset) graph of concentrations vs. time in Figure B-16 shows increasing concentrations of Total CVOCs and 1,1-Dichloroethane between October 2019 and October 2020, and does not indicate that concentrations in the well are stable.
- MW04-30-BR: Similar to MW04-29-BR, the well is located down-gradient of the GWETS, southeast of the remaining active recovery well. Groundwater flow in the Outwash/St. Peter Unit in the area of MW04-30-BR is not well-defined or consistent (Figures 5 through 8). Concentrations of CVOCs decreased significantly after the system start-up from some of the highest levels reported at the Site. However, as displayed in the detailed (inset) graph of concentrations vs. time in Figure B-17, immediately after the shutdown of the system, the concentrations of Total CVOC and PCE significantly increased and appear to be fluctuating (not stable) since.
- MW04-33-SP: The well is the only Outwash/St. Peter well located west of the GWETS. Overall and after the system start-up, the concentrations of Total CVOC and PCE have decreased in the well, as indicated by the Mann-Kendall trend analysis. However, since the shutdown of the system, the concentrations have increased (almost to pre-system start-up levels), appear to be fluctuating (not stable), and no trend in the concentrations is indicated by the Mann-Kendall trend analysis.
- MW07-42-I: The well is located close to and down-gradient of the remaining active recovery well. Overall and after the system start-up, the concentrations of CVOCs decreased in the well, as indicated by the Mann-Kendall trend analysis. However, since the shutdown of the system, the concentrations have increased, as indicated by the Mann-Kendall trend analysis and appear to be fluctuating (not stable). Although the Annual Report states that "...MW07-42-I is within 50 feet of MW07-41-I, which has a similar data record but an initially higher cVOC concentration. Therefore, with continued monitoring of MW07-41-I, the requested changes to monitoring in MW07-42-I are justified.", the detailed (inset) graphs of concentrations vs. time for the two wells (Figures B-30 and B-31) indicate dissimilar trends starting in approximately 2015 (mid-operation of the system) through the present (post-shutdown). During this time, CVOC concentrations increased in MW07-41-I toward the end of the system's operation, but have decreased after the shutdown of the system. However, CVOC concentrations continued to decrease in MW07-42-I during the system's operation, but have increased since the shutdown.

2. Section 7, Recommendations:

- a. The revised groundwater monitoring and sampling plan/program presented in Section 5 and Table 6 of the Annual Report, is approved with the incorporation of the above modifications.

- b. Shutdown of the groundwater extraction system in 2022, as recommended in the Annual Report is approved.
- c. The Annual Report recommends: "Continued monthly effluent monitoring through shutdown of the final extraction well, and quarterly groundwater level measurements and semi-annual groundwater quality monitoring through shutdown and after extraction system shutdown to monitor for sustained rebound in relation to historical concentrations. Rebound monitoring will continue for two years after shutdown."

The recommendation is approved with the following clarification and modification: Rebound monitoring will continue for two years after shutdown, at which time, re-evaluation of the groundwater levels and concentrations, and plume attenuation and stability will be conducted and provided to the MPCA for approval. During the period of re-evaluation and reporting, and until approval is provided by the MPCA, the groundwater monitoring and sampling plan/program described above and in the Annual Report (including modifications provided by the MPCA in this approval) will continue to be conducted.

- d. Although the Annual Report does not recommend the sealing of any monitoring or extraction wells at the Site, the MPCA's approval of the revised groundwater monitoring and sampling plan/program (including the above modifications) and shutdown of the groundwater extraction system does not authorize the sealing of any of the wells at the Site. Because rebound monitoring and sampling of the groundwater plume will be conducted at the Site, all of the monitoring and extraction wells shall remain intact, maintained, and functioning (not sealed) at this time and until the MPCA approves sealing activities.

3. Figure 2, Total CVOC Isoconcentration Contours October 2020:

- a. The 'Outwash/St. Peter – Pre-Pumping' sub-figure includes the Total CVOC concentration of 749 ug/L at MW06-01-I, as the maximum concentration from the 2007 sampling events (as stated in Note #1 on the Figure), and which is also included in the graph of concentrations vs. time for the well (Figure B-26). Although MW06-01-I is classified as an Outwash well (screened from 110.5 to 125.5 feet bgs), the concentration contours drawn in Figure 2 do not include the result from the well. Because MW06-01-I is nested with the deeper well MW06-01-BR, a St. Peter Mudstone/Outwash well (screened from 176 to 180 feet bgs), MPCA staff assume that the concentration contours were purposefully drawn in Figure 2 to only reflect the result from MW06-01-BR (26 ug/L; the maximum concentration from the 2007 sampling events), and that the omission of the Total CVOC concentration of 749 ug/L at MW06-01-I from the contouring was not purposeful or in error.
- b. During the review of the Annual Report, MPCA staff noted that the Total CVOC concentrations for the monitoring wells included on the 'Shallow/Till – 2020' and 'Outwash/St. Peter – 2020' sub-figures of Figure 2 and in the Mann-Kendall statistical analysis are not the same as the Total CVOC concentrations summarized in Appendix E, Table 9 of the Annual Report, and included in Table 9 of the *2020 Annual Groundwater Monitoring Report, East Side Shoreham Facility*, dated September 2, 2021, prepared by Wood Environment & Infrastructure Solutions, Inc. (Wood). In response to the MPCA's email correspondence to CP, dated December 29, 2021, requesting clarification of the discrepancies in the Total CVOC results reported, Golder provided the following (summarized) information via email correspondence dated January 5, 2022:

The discrepancy between the Total CVOC concentrations is the result of different methods used for calculating Total CVOCs by Wood (included in Table 9) and by Golder (included in Table 2 and the statistical analysis). Only detected CVOCs were summed by Wood in the Total CVOCs results in Table 9, and non-detected compounds were not included. In Figure 2 and the statistical analysis included in the Annual Report, Total CVOCs summed by Golder also included one-half of the reporting limit for non-detected compounds. For future Wood and Golder annual reports, Total CVOCs will be calculated consistently using Golder's method of including one-half of the reporting limit for non-detected compounds.

Please contact Matthias Wolf or myself if you have any questions regarding the MPCA's review and approval of the Annual Report.

Thank you,
Tom

Thomas Reppe, P.G.
Environmental Specialist/Project Manager
Minnesota Pollution Control Agency (MPCA)
Remediation Division
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From: Bergeon, Mark <Mark_Bergeon@golder.com>
Sent: Wednesday, January 5, 2022 13:24
To: Karlene French <Karlene_French@cpr.ca>; Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us>
Cc: Grape, Timothy (MPCA) <timothy.grape@state.mn.us>; Wolf, Matthias (MPCA) <matthias.wolf@state.mn.us>; Patrick McGuire <pmcguire@integral-corp.com>; Karah Conklin <kconklin@integral-corp.com>; Melissa Marietta <mmarietta@integral-corp.com>; Steve Helgen <shelgen@integral-corp.com>; Brodin, Michelle (<michelle.brodin@stinson.com>) <michelle.brodin@stinson.com>; Damle, Neha <Neha_Damle@golder.com>; Kane, Allen <allen_kane@golder.com>; James Vondracek <jevondracek@ashland.com>; Frame, Thomas W. <tom.frame@minneapolismn.gov>; Weldon, Bryan <Bryan_Weldon@golder.com>; Councilman Reich (<kevin.reich@minneapolismn.gov>) <kevin.reich@minneapolismn.gov>
Subject: RE: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

NOTE: This email chain appears to contain email from outside Golder

Hi Tom and Matthias,
As indicated in your email of December 29, the Total CVOC concentrations for the monitoring wells included on the 'Shallow/Till – 2020' and 'Outwash/St. Peter – 2020' sub-figures of Figure 2 are not the same as the Total CVOC concentrations summarized in Table 9. The discrepancy lies in the methods used for calculating Total CVOCs by Wood for inclusion in Table 9 and by Golder for use in the statistical analyses and for inclusion on Figure 2. Only detected CVOCs are summed in the Total CVOCs results included in "Table 9" of Appendix E, which is a table reproduced from the 2020 Annual Groundwater Monitoring Report, East Side Shoreham Facility, prepared by Wood; non-detected compounds do not contribute to the Total CVOCs.

In Figure 2, consistent with Appendices A and B of the Golder Annual Report, Total CVOCs include values for non-detected compounds at one-half of the reporting limit. For the purposes of conducting trend analyses using the Mann-Kendall method, representation of non-detected values with ½ the reporting limit is a generally accepted practice. For consistency within the Golder report, the same calculated values were used for the sub-figures on Figure 2. Therefore,

there is no need to correct any results and there are no changes to the statistical analyses, conclusions, recommendations, or revised groundwater monitoring plan included in the Annual Report.

For future Wood and Golder annual reports, Total CVOCs will be calculated consistently for the two reports using the Golder Annual Report method, i.e., non-detected values will be included in Total CVOCs at ½ of the reporting limit.

If you need any additional information, please let us know.

Regards
Mark

Mark A. Bergeon, PG (KY,MN,WI), CEM (NV)
Program Leader - Railroad Services / Associate

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-----Original Message-----

From: Karlene French <Karlene_French@cpr.ca>

Sent: December 30, 2021 7:01 AM

To: Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us>

Cc: Grape, Timothy (MPCA) <timothy.grape@state.mn.us>; Wolf, Matthias (MPCA) <matthias.wolf@state.mn.us>;

Patrick McGuire <pmcguire@integral-corp.com>; Karah Conklin <kconklin@integral-corp.com>; Melissa Marietta

<mmarietta@integral-corp.com>; Steve Helgen <shelgen@integral-corp.com>; Brodin, Michelle

(<michelle.brodin@stinson.com> <michelle.brodin@stinson.com>); Bergeon, Mark <Mark_Bergeon@golder.com>; Damle,

Neha <Neha_Damle@golder.com>; Kane, Allen <allen_kane@golder.com>; James Vondracek

<jevondracek@ashland.com>; Frame, Thomas W. <tom.frame@minneapolis.mn.gov>; Weldon, Bryan

<Bryan_Weldon@golder.com>; Councilman Reich (<kevin.reich@minneapolis.mn.gov> <kevin.reich@minneapolis.mn.gov>)

Subject: Re: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

EXTERNAL EMAIL

Hi Tom and Matthias,

Thank you for your prompt and thorough review of the annual report. We will resolve the discrepancies quickly and respond with an addendum or additional information as requested. CP definitely wants information provided about the site to be accurate.

Happy new year.

Karlene

Sent from my iPhone

On Dec 29, 2021, at 4:28 PM, Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us> wrote:

This email did not originate from Canadian Pacific. Please exercise caution with any links or attachments.

Karlene,

Minnesota Pollution Control Agency (MPCA) staff continue to review the 2020 Annual Report, Overburden Groundwater Extraction and Treatment System, Southeastern Area - East Side Shoreham Facility, dated October 12, 2021 (Annual Report), prepared by Golder Associates Inc. on behalf of Canadian Pacific (CP).

During the review of the Annual Report, MPCA staff have noted discrepancies in the Total CVOC results reported in Figure 2, Total CVOC Isoconcentration Contours October 2020, and the Total CVOC results summarized in Appendix E, Table 9, October 2020 Groundwater Analytical Detections and also included in Table 9, October 2020 Groundwater Analytical Detections of the 2020 Annual Groundwater Monitoring Report, East Side Shoreham Facility, dated September 2, 2021, prepared by Wood Environment & Infrastructure Solutions, Inc. on behalf of CP.

Specifically:

- 1) The Total CVOC concentrations for the monitoring wells included on the 'Shallow/Till – 2020' and 'Outwash/St. Peter – 2020' sub-figures of Figure 2 are not the same as the Total CVOC concentrations summarized in Table 9.

- 2) The Total CVOC concentrations reported in the Mann-Kendall statistical analysis included in the Annual Report are the same as the Total CVOC concentrations included on Figure 2. Therefore, these concentrations are not consistent with the results reported in Table 9.

Because of these noted discrepancies, the MPCA requests the submittal of additional information before being able to complete the final review/approval of the Annual Report.

Please provide an explanation for the differences in the Total CVOC concentrations included on Figure 2 (and in the Mann-Kendall statistical analysis) and those reported in Table 9, and which set of results are accurate for the October 2020 sampling event. If correction of the inconsistent results cause any changes to the statistical analysis, conclusions, recommendations, or revised groundwater monitoring plan included in the Annual Report, please submit the revised information to the MPCA for review as an addendum to the Annual Report. Similarly, if correction of the inconsistent results does not change any of the statistical analysis, conclusions, recommendations, or revised groundwater monitoring plan, please state this so that MPCA staff can proceed with completing the review of the Annual Report.

MPCA staff appreciates CP's cooperation with providing this explanation and additional information, and CP's interest in providing consistent and accurate information for the site.

If you have any questions regarding the MPCA's requests, please contact Matthias Wolf or myself.

Thank you,
Tom

Thomas Reppe, P.G.

Environmental Specialist/Project Manager Minnesota Pollution Control Agency (MPCA) Remediation Division

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https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__http%3A%2F%2Fwww.pca.state.mn.us%2F__%3B!!lww4!wfpVzbT4r_FcYJBwf49Tsb3F4cwzpylUKCpNot7vvPgwbPC7gnNczL0aOyK9jqk4Q%24&data=04%7C01%7Cmark_bergeon%40golder.com%7C956054752fda4235c40108d9cb9473d8%7C46b66e8634824192842f3472ff5fe764%7C1%7C0%7C637764660766119171%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCi6Mn0%3D%7C3000&data=KY3GKuMH6HVwLWRQ53EY7nEID4BPOHTahDQdNTAm95g%3D&reserved=0

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From: Karlene French <Karlene_French@cpr.ca>

Sent: Tuesday, November 30, 2021 16:50

To: Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us>

Cc: Grape, Timothy (MPCA) <timothy.grape@state.mn.us>; Wolf, Matthias (MPCA) <matthias.wolf@state.mn.us>;

Patrick McGuire <pmcguire@integral-corp.com>; Karah Conklin <kconklin@integral-corp.com>; Melissa Marietta

<mmarietta@integral-corp.com>; Steve Helgen <shelgen@integral-corp.com>; Brodin, Michelle

(michelle.brodin@stinson.com) <michelle.brodin@stinson.com>; 'mark_bergeon@golder.com'

<mark_bergeon@golder.com>; Damle, Neha <Neha_Damle@golder.com>; Kane, Allen <allen_kane@golder.com>;

'James Vondracek' <jevondracek@ashland.com>; Frame, Thomas W. <tom.frame@minneapolis.gov>;

kevin.reich@minneapolis.gov; 'Weldon, Bryan' <Bryan_Weldon@golder.com>

Subject: RE: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

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Hi Tom and Matthias,

Thank you very much for your preliminary review to accommodate our planning for 2022 expenditures. We will look for your formal approval and comments in December.

Thank you, again.

Karlene

<image003.png>

Karlene A. French
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From: Reppe, Thomas (MPCA) <Thomas.Reppe@state.mn.us<mailto:Thomas.Reppe@state.mn.us>>
Sent: Tuesday, November 30, 2021 1:41 PM
To: Karlene French <Karlene_French@cpr.ca<mailto:Karlene_French@cpr.ca>>
Cc: Grape, Timothy (MPCA) <timothy.grape@state.mn.us<mailto:timothy.grape@state.mn.us>>; Wolf, Matthias (MPCA) <matthias.wolf@state.mn.us<mailto:matthias.wolf@state.mn.us>>; Patrick McGuire <pmcguire@integral-corp.com<mailto:pmcguire@integral-corp.com>>; Karah Conklin <kconklin@integral-corp.com<mailto:kconklin@integral-corp.com>>; Melissa Marietta <mmarietta@integral-corp.com<mailto:mmarietta@integral-corp.com>>; Steve Helgen <shelgen@integral-corp.com<mailto:shelgen@integral-corp.com>>; Brodin, Michelle (michelle.brodin@stinson.com<mailto:michelle.brodin@stinson.com>) <michelle.brodin@stinson.com<mailto:michelle.brodin@stinson.com>>; 'mark_bergeon@golder.com' <mark_bergeon@golder.com<mailto:mark_bergeon@golder.com>>; Damle, Neha <Neha_Damle@golder.com<mailto:Neha_Damle@golder.com>>; Kane, Allen <allen_kane@golder.com<mailto:allen_kane@golder.com>>; 'James Vondracek' <jevondracek@ashland.com<mailto:jevondracek@ashland.com>>; Frame, Thomas W. <tom.frame@minneapolismn.gov<mailto:tom.frame@minneapolismn.gov>>; kevin.reich@minneapolismn.gov<mailto:kevin.reich@minneapolismn.gov>; 'Weldon, Bryan' <Bryan_Weldon@golder.com<mailto:Bryan_Weldon@golder.com>>
Subject: RE: CP Shoreham Yard - Overburden Groundwater Extraction Treatment System 2020 Annual Report

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Karlene,

Minnesota Pollution Control Agency (MPCA) staff are currently reviewing the 2020 Annual Report, Overburden Groundwater Extraction and Treatment System, Southeast Area – East Side Shoreham Facility (Report), submitted on October 12, 2021.

Based on the preliminary review, and to facilitate CP's planning for 2022, the conclusions and recommendations in the Report appear appropriate with the inclusion of some modifications to the proposed monitoring plan. The MPCA's formal review of the Report will be provided to CP in December 2021.

If you have any questions, please contact Matthias Wolf, MPCA Hydrologist, or myself.

Thank you,
Tom

Thomas Reppe, P.G.
Environmental Specialist/Project Manager Minnesota Pollution Control Agency (MPCA) Remediation Division

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2luMzliLCJBTiI6k1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=TkxjYlgNuQ630vNTwWzqnhquVO2f4A4ofvoNFnPLi4
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Twitter<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Furldefense.com%2Fv3%2F__https%3A%
2F%2Fgcc02.safelinks.protection.outlook.com%2F%3Furl%3Dhttps%3A%2F%2Furldefense.com%2Fv3%2F__https%3A%2Fgc
c02.safelinks.protection.outlook.com%2F%3Furl%3Dhttps%3A%2F%2Ftwitter.com%2FGolderAssociate*2F*26data*3D04*7
C01*7CThomas.reppe*40state.mn.us*7Ccbcd53602ec04bd6629c08d98e8dfd63*7Ceb14b04624c445198f26b89c215982
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