



# Minnesota Pollution Control Agency

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April 26, 2005

Mr. Brian Swanson  
University of Minnesota Project Coordinator  
335 Morrill Hall  
100 Church Street SE  
Minneapolis, Minnesota 55455

RE: Gopher Football Stadium  
NE corner of University Avenue SE and Oak Street SE, Minneapolis  
MPCA Project Number VP20200  
Draft EAW/Scoping Document Comments

Dear Mr. Swanson:

The MPCA designated project team in the Voluntary Investigation and Cleanup Program for the Gopher Football Stadium site has reviewed the draft "Environmental Assessment Worksheet, University of Minnesota Football Stadium" and "University of Minnesota Football Stadium, Draft Scoping Decision Document" (Draft Documents) both dated March 2005. The review was conducted from the perspective of the environmental investigation and cleanup that will be reasonable and necessary for the construction of the proposed Gopher Football Stadium. We have the following comments on the Draft Documents.

EAW, Section 8, Permits and approvals required.

Dewatering may be necessary for the construction of the stadium or it may be a component of the environmental cleanup. Given that a portion of the ground water contains high levels of creosote compounds, the resulting wastewater may potentially be disposed of in the sanitary sewer, requiring a permit from Metropolitan Council Environmental Services (MCES).

EAW, Section 9, Land use.

Former land uses have impacted the ground water as documented in data for the former Standard Oil property and former Republic Creosoting Company. The draft EAW states that the past land uses have potentially impacted ground water.

EAW, Section 13, Water Use.

Dewatering may be a reasonable and necessary component of the environmental cleanup, whether or not it is necessary for the stadium construction.

EAW, Section 18, Water Quality – Wastewater, Item b.

Contaminated wastewater from any construction dewatering or environmental cleanup may need on-site treatment prior to disposal in the sanitary or storm sewer systems in order to meet the conditions of an MCES or NPDES permit.

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EAW, Section 19, Geologic hazards and soil conditions, Item a.

Additional subsurface data is necessary to determine the magnitude and extent of contaminated soil and ground water, determine potential impacts to human health and the environment, and to design the cleanup actions. The MPCA will require additional environmental investigative work prior to the approval of a Response Action Plan (RAP).

EAW, Section 19, Geologic hazards and soil conditions, Item b.

As a condition of the MPCA No Association Determination the University of Minnesota has requested for the Gopher Football Stadium project, the university will be required to conduct the stadium construction, operations and maintenance in a manner that will minimize the potential for the stadium project to contaminate soil and/or ground water.

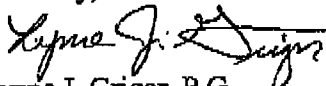
EAW, Section 24, Odors, noise and dust.

Scoping Document, Section III, EIS Issues.

The past investigation and cleanup activities for the creosote release at the site produced strong, obnoxious odors when the creosote contaminated soil and ground water was exposed. Therefore, the MPCA has concerns about the odors and dust from contaminated media at the site and feels strongly that those items need to be included in the Environmental Impact Statement as well as in the Response Action Plan.

If you have any comments concerning the information in the letter feel free to contact me at (651) 296-8572 or Wayne Sarappo at (651) 296-7297.

Sincerely,



Lynne J. Grigor, P.G.  
Senior Environmental Geologist  
Voluntary Investigation and Cleanup Unit  
Superfund Section  
Remediation Division

LJG/jmp