MINNESOTA MDH DEPARTMENT OF HEALTH

→ Venky Venkatesh
CH2MHILL

Production Wells

Protecting, Maintaining and Improving the Health of All Minnesotans

March 29, 2000

6 pages

Mr. Joel Sanders, P.E.
Remedial Project Manager
Naval Facilities Engineering Command
Department of the Navy--Southern Division
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Dear Mr. Sanders:

We have received your letter of March 22, 2000, regarding your plans and schedule to seal production wells Number 2 and Number 3 at the Naval Industrial Reserve Ordnance Plant in Fridley, Minnesota. Thank you for your timely response. The timetable to seal these wells within the year 2000 is acceptable.

When the well contractor or well sealing contractor seals the well, the contractor will first submit a well sealing notification to the Minnesota Department of Health (MDH). The person identified as the well owner will received a confirmation of this notification. When the well is sealed, the contractor must then submit copies of the well and boring sealing record to the MDH and to the well owner. This record is important documentation to maintain, especially if and when the property is sold in the future.

If you have any further questions, please contact me at (651) 215-0818.

Sincerely,

Michael P. Convery

Michael P. Convery, PG
Operations Unit Supervisor
Well Management Section

MPC:jmw
cc: David Douglas, Minnesota Pollution Control Agency

United Defense

March 28, 2000
E0036/3.1.4

CERTIFIED MAIL
Return Receipt Requested

Minnesota Dept. of Health
Well Management Section
121 East Seventh Place
St. Paul, Minnesota 55101

Attention: Michael P. Convery, PG
Operations Unit Supervisor

Subject: Water Supply Well No. 206697 - Abandonment

Reference:
(a) Letter from M. Convery (MDH) dated March 7, 2000 to D. Hildre (UDLP)

Pursuant to your letter, reference (a), Armament Systems Division of United Defense, L.P. intends to abandon the Plant Water Supply Well No 1 (Unique Well No. 206697). Over the time the well has been physically shut down since 1983, it had been our hope that through remediation efforts on-site, that the groundwater could be cleaned up so that this well and the two Navy-owned production wells could be reinstated into use.

It is now apparent that use of these wells are highly remote. Because of concerns raised in reference (a), solicitation of two certified well drillers to abandon the United Defense-owned well have been initiated. Depending on which well driller is selected, abandonment would take place sometime between April to July. I will keep you apprised of the actual schedule when it is better defined.

Should you have any questions on this matter, please contact the undersigned at (763) 572-6938.

United Defense, L. P.
Armament systems Division

Douglas L. Hildre, P.E.
Environmental Affairs Manager

DLH:dlh
CC: A. Morrison, UDLP
J. Sanders, South Div NAVFACENGCOM, Charleston, SC

United Defense LP Armament Systems Division
4800 East River Road Minneapolis Minnesota 55421-1498 Telephone 612 571 9201

Code 1868
22 Mar 2000

Mr. Michael P. Convery, PG
Well Management Section
Minnesota Department of Health
Metro Square Building Suite 220
Post Office Box 64975
Saint Paul, Minnesota 55164-0975

Subj: UNUSED, UNSEALED WATER-SUPPLY WELLS AT THE NAVAL INDUSTRIAL RESERVE ORDNANCE PLANT, FRIDLEY, MINNESOTA; NOTIFICATION OF PRODUCTION WELLS NO. 2 AND 3 ABANDONEMENT

Encl: (1) MDH letter of March 7, 2000

Dear Mr. Convery:

Production wells 2 and 3 will be abandoned under Navy contract N62467-98-D-0995/0024 with CH2MHILL Constructors, Inc, Atlanta, Georgia. The contract was awarded March 8, 2000. Notice to proceed on abandoning the wells has not been determined but is tentatively scheduled between July and December 2000. The well sealing work will be done by a licensed well contractor or well sealing contractor.

Please call me at (843) 820-5562 for any clarifications or questions.

Sincerely,

JOEL SANDERS, P.E.
Remedial Project Manager

Copy to: (w/encl)
CH2MHILL (Jeff Lamount)
CH2MHILL (Venky Venkatesh)
NIROP NAVSEA Tech Rep (Kerry Morrow)
MPCA (David Douglas)
US EPA V (Tom Bloom)
UDLP (Douglas L. Hildre)
TTNUS (Mark Sladic)

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DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
P.O. BOX 190010
2155 EAGLE DRIVE
NORTH CHARLESTON, S.C. 29419-9010

Code 1868
22 Mar 2000

Mr. Michael P. Convery, PG
Well Management Section
Minnesota Department of Health
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JOEL SANDERS, P.E.
Remedial Project Manager

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MINNESOTA MDH DEPARTMENT OF HEALTH

Protecting, Maintaining and Improving the Health of All Minnesotans

March 7, 2000

Mr. Joel R. Sanders, Code 1868
Commanding Officer–Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Mr. Patrick K. Morrow
Technical Representative, NAVSEA
Department of the Navy
5001 East River Road
Minneapolis, Minnesota 55421-1406

Dear Mr. Sanders and Mr. Morrow:

Subject: Unused, Unsealed Water-Supply Wells at the Naval Industrial Reserve Ordnance Plant (NIROP) East River Road, Fridley, Anoka County, Minnesota

Minnesota Statutes, Chapter 103I, establishes the requirements for the construction, repair, and sealing of wells in Minnesota. Minnesota Statutes, section 103I.301, requires that the owner of property on which a well is located must have the well sealed if the well is:

1. contaminated;
2. sealed in a manner which violates state requirements;
3. located, constructed, or maintained in a manner that its continued use or existence endangers the groundwater quality or is a safety or health hazard; or
4. not in use and does not have a maintenance permit.

Under Minnesota Statutes, section 103I.231, the commissioner of health may order a well sealed for any of the conditions noted above.

The wells on the NIROP property are currently not in use, were found to be contaminated in the early groundwater investigations at the facility, and have since removed from service. The current conditions of the wells may aggravate the existing groundwater contamination problem at the site by providing a direct conduit into the underlying Prairie du Chien Dolomites and Jordan Sandstone. When the wells were first found to be contaminated, the facility continued to utilize the wells for process water. Our understanding is the wells have been out of service for a number of years. The Public Health Assessment for the Naval Industrial Ordinance Plant published by the United States Department of Health and Human Services on September 28, 1999, recommended the wells be permanently sealed in accordance with the Minnesota rule requirements (Minnesota Rules, Chapter 4725).

The records for the wells, Unique Numbers 206695 and 234001, indicate the wells were constructed in 1942 by Mc Carthy Well Company for United States Navy. Well depths for both

wells are 288 feet, completed in the Prairie du Chien Dolomites and the Jordan Sandstone. Casing appears to consist of 156 feet of 16-inch steel casing. There is always the possibility that subsequent repairs or reconstruction, which would not be reflected on these records, may have modified these wells. I have enclosed copies of the records for your review.

Unsealed, abandoned wells are a potential liability for the property owner. A well owner may be held legally liable if a well is a source or cause of groundwater contamination. A well owner is not liable for contamination of groundwater through the well after the well has been sealed by a licensed well contractor and the seal has not been disturbed (see Minnesota Statutes, section 103I.325).

Please be advised that well sealing work must be done by a licensed well contractor or well sealing contractor. Please inform me within 30 days of receipt of this letter of your plans for the wells.

If you have any questions, or if you believe our information is incorrect or incomplete, please contact me at (651) 215-0818.

Sincerely,

Michael P. Convery

Michael P. Convery, PG
Operations Unit Supervisor
Well Management Section

MPC:jmw
Enclosure
cc: David Douglas, Minnesota Pollution Control Agency