



**Minnesota Department of Health**  
121 East Seventh Place  
P.O. Box 64975  
St. Paul, MN 55164-0975

N91192.AR.000407  
NIROP FRIDLEY  
5090.3a

## NOTICE OF VIOLATION

August 25, 1998

Mr. James Stark  
U.S. Geological Survey  
2280 Wooddale Drive  
St. Paul, Minnesota 55112

Dear Mr. Stark:

Subject: Violation of Minnesota Rules, Chapter 4725, for Unique Number 582072, Located at 4800 East River Road, Fridley, Township 30, Range 24, Section 27, Anoka County, Minnesota

---

The purpose of this letter is to inform you of violations of Minnesota Rules, Chapter 4725, recently noted by representatives of the Minnesota Department of Health (MDH) and to request that you make specific corrections.

On July 9, 1998, a field inspection performed by Mr. Steven Bennett of the MDH at the above-mentioned property determined that the United States Geological Survey (USGS) had constructed a series of monitoring wells for the Department of the Navy. Mr. Bennett was informed by Mr. James Ruhl of the USGS that the well owner of Unique Number 582072 is the United States Navy and that the well is located on private property owned by United Defense L.P. Mr. Ruhl indicated that the well was constructed with approximately 110 feet of 2-inch diameter flush threaded Poly Vinyl Chloride (PVC) casing and 10 feet of PVC screen.

Minnesota Rules, part 4725.6650, subpart 1 allows the use of flush threaded PVC casing in monitoring wells only under limited circumstances because of casing thread leakage and minimal material strength. The rules allow flush threaded PVC casing only where the total depth of the monitoring well is 50 feet or less and the monitoring well is completed in unconsolidated materials. Unique Number 582072 does not comply with the requirements of Minnesota Rules, part 4725.6650, subpart 1.

In order to bring the well into compliance with Minnesota Rules, Chapter 4725, corrective actions must be taken by **September 25, 1998**. Corrective actions could include removal of the flush threaded casing or sealing of the well. Sealing will require the placement of an approved grout from the bottom of the well to within 2 feet of the ground surface.

Mr. James Stark  
Page 2  
August 25, 1998

Mr. Scott Glass from the Department of the Navy has requested that the MDH allow the well to remain in use. He has indicated that the well is needed to monitor the most effective remedial well on the property. He also indicated that the flush threaded casing is needed because of chemical interference that would result from the use of solvent-welded PVC casing or steel casing. He also indicated that the well was successfully grouted with neat cement which exceeds the minimum grouting requirements of Minnesota rules and provides protection from joint leakage.

The MDH may enter into a stipulation agreement to allow the well to remain uncorrected. The stipulation would require that parties demonstrate that significant mitigating factors exist, acknowledge the violation, agree to certain conditions, and require a monetary forfeiture of \$240 for failure to obtain a variance before constructing the well.

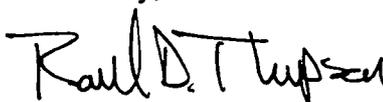
Failure to correct the well, seal the well, or enter into a stipulation agreement by **September 25, 1998**, may result in the MDH initiating additional enforcement actions against you.

Please be advised that any repeated violations of Minnesota rules may result in the assessment of administrative penalties against you.

Please contact Mr. Bennett at 651/215-0815 or me at 651/215-0831 within ten days of receipt of this letter if you believe our information is incorrect or incomplete or if you have any questions about the content of this letter.

You must contact Mr. Bennett at least 24 hours prior to the start of corrective work, so that an inspector may be present at the time the work is being performed. This is a requirement of this notice and failure to notify the MDH prior to beginning any corrective work will be considered a violation of this notice.

Sincerely,



Ronald D. Thompson, Supervisor  
Metro Compliance and Inspection  
Well Management Section

RDT:SDB:jls  
cc: Scott Glass, Department of the Navy  
Doug Hilbre, United Defense  
E. H. Renner and Sons