



# Minnesota Pollution Control Agency

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January 7, 2016

JAN 14 2016

Ms. Carie Fuhrman  
City of Vadnais Heights  
Planning/Community Development Director  
800 East County Road E  
Vadnais Heights, MN 55127-7044

RE: Approval of Response Action Plan or Construction Contingency Plan  
MPCA Site: Vadnais Heights Redevelopment Properties, 3429-3447 Centerville Road, Vadnais Heights  
MPCA Project #: PB4934/VP33480  
PINs: 323022130055, 323022130054, and 323022130007

Dear Ms. Fuhrman:

The Minnesota Pollution Control Agency (MPCA) Brownfields staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the Response Action Plan (RAP) & Contingency Construction Plan (CCP) submitted for the Vadnais Heights Redevelopment Properties site, located at the address referenced above (the Site). The RAP/CCP dated November 6, 2015, was prepared and submitted on your behalf by American Engineering Testing, Inc.

The Site consists of three parcels of land totaling approximately 3.25 acres.

The western parcel was developed with buildings as early as 1886 and fluctuated between and fluctuated between having buildings and being agricultural land until the store building was constructed between 1957 and 1961. A second building was constructed by 1974. An addition to the store building was constructed by 1991 and the third building was added by 1997. The store building operated as a hardware store and repaired small engines from at least 1967 until sometime after 2012.

The middle parcel contains a vacant, multi-tenant commercial building that was constructed in 1934 and was formerly occupied by a gas station/automotive repair facility, a restaurant, liquor stores, markets and an apartment. The building on the east parcel was constructed in 1900 and has been used as residential.

Subsurface investigations were conducted at the Site in 2015 to assess the environmental impact of past land use. Soil samples were collected and analyzed for the presence of volatile organic compounds (VOCs), semi-VOCs, diesel range organics (DRO), gasoline range organics (GRO) and eight Resource Conservation and Recovery Act metals.

PAHs expressed as benzo(a)pyrene equivalents were detected in two soil samples at concentrations exceeding the MPCA's industrial soil reference value (SRV). Naphthalene was detected in one soil sample at a concentration exceeding the MPCA's residential SRV. Chromium was detected in two soil samples at concentrations exceeding MPCA's soil leaching value (SLV). Groundwater samples were collected and analyzed for VOCs, semi-VOCs, RCRA metals, DRO, and GRO. Arsenic was detected in one groundwater sample at a concentration exceeding the US Environmental Protection Agency's Maximum Contaminant Level (MCL). Naphthalene was detected in two groundwater samples at concentrations below drinking water criteria. DRO and GRO were also detected in several of the groundwater samples. Soil vapor samples were collected and analyzed for VOCs. Tetrachloroethene (PCE) was detected in three soil vapor samples at concentrations exceeding the MPCA's residential intrusion screening value (ISV) but less than ten times (10X) the residential ISV. Soil samples were also collected and analyzed for asbestos-containing material. Floor tile and insulation samples were found to contain asbestos.

The City of Vadnais Heights proposes to demolish and remove the existing Site buildings and redevelop the Site with a senior living facility and parking lot. Non-recyclable debris and soil with residential soil reference value exceedances will be disposed of at a permitted landfill. Contaminated groundwater or stormwater will be disposed of utilizing either a MCES or NPDES permit.

The RAP/CCP is hereby approved, subject to the following conditions:

1. Green space areas shall be underlain by four feet of clean fill.
2. Buildings and pavement shall be underlain by two feet of clean fill.
3. Soil stockpiles shall be placed on and covered with polyethylene sheeting that is at least 10-mil in thickness. Stockpiles shall be bermed to prevent run-on and runoff.
4. Imported soil and excess fill targeted for off-site reuse shall be from a native source and/or meet the MPCA's criteria for Unregulated Fill. Soils that do not meet Unregulated Fill criteria may not be used at the discretion of the contractor or other project personnel.
5. Any contaminated soils removed from the Site must be treated or disposed of in a method approved by the MPCA. Contaminated soils transported to an approved landfill must be in compliance with all state and local permits. The applicant must notify MPCA staff when contaminated soils are initially transported and where soils will be disposed of prior to disposal.
6. This RAP/CCP approval is contingent on the applicant obtaining all other required state, federal and local government permits.
7. This approval does not supplant any applicable State or local stormwater permits, ordinances, or other regulatory documents.

An implementation report describing the completed response action activities, sampling results, soil management and disposal, and imported soils shall be prepared and submitted to the MPCA. If the implementation report will not be submitted within one year of the date of this letter, please notify the MPCA project staff of the status of the development.

Ms. Carie Fuhrman

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January 8, 2016

This letter is subject to the disclaimers found in Attachment A. If you have any questions about this letter, please contact Andrew Nichols, Project Manager, at 651-757-2612 or via e-mail at [andrew.nichols@state.mn.us](mailto:andrew.nichols@state.mn.us) or Brittney Schuller, Project Manager, at 651-757-2444 or [brittney.schuller@state.mn.us](mailto:brittney.schuller@state.mn.us).

Sincerely,

Handwritten signature of Andrew Nichols in blue ink, including the text "for" and a small mark.

Andrew Nichols  
Project Manager  
Site Remediation & Redevelopment Section  
Remediation Division

Handwritten signature of Brittney Schuller in blue ink.

Brittney Schuller  
Project Manager  
Petroleum Remediation & Redevelopment Section  
Remediation Division

AN/BMS:sth

Enclosure

cc: Mike Hultgren, American Engineering Testing, Inc

**ATTACHMENT A**  
**DISCLAIMERS**  
**MPCA Site: Vadnais Heights Redevelopment Properties**  
**MPCA Project #: PB4934/VP33480**  
**PINs: 323022130055, 323022130054, and 323022130007**

1. Reservation of Authorities

The MPCA Commissioner reserves the authority to take any appropriate actions with respect to any release, threatened release, or other conditions at the Site. The MPCA Commissioner also reserves the authority to take such actions if the voluntary party does not proceed in the manner described in this letter or if actions taken or omitted by the voluntary party with respect to the Site contribute to any release or threatened release, or create an imminent and substantial danger to public health and welfare.

2. No MPCA Assumption of Liability

The MPCA, its Commissioner and staff do not assume any liability for any release, threatened release or other conditions at the Site or for any actions taken or omitted by the voluntary party with regard to the release, threatened release, or other conditions at the Site, whether the actions taken or omitted are in accordance with this letter or otherwise.

3. Letter Based on Current Information

All statements, conclusions and representations in this letter are based upon information known to the MPCA Commissioner and staff at the time this letter was issued. The MPCA Commissioner and staff reserve the authority to modify or rescind any such statement, conclusion or representation and to take any appropriate action under his authority if the MPCA Commissioner or staff acquires information after issuance of this letter that provides a basis for such modification or action.

4. Disclaimer Regarding Use or Development of the Property

The MPCA, its Commissioner and staff do not warrant that the Site is suitable or appropriate for any particular use.

5. Disclaimer Regarding Investigative or Response Action at the Property

Nothing in this letter is intended to authorize any response action under Minn. Stat. § 115B.17, subd. 12.

6. This approval does not supplant any applicable state or local stormwater permits, ordinances, or other regulatory documents.