

Subject: BF0001281 - Hillcrest Golf Course, RAP Approval letter (Billing ID 29394)
Date: Monday, May 2, 2022 at 1:18:06 PM Central Daylight Time
From: Nichols, Andrew (MPCA)
To: Monte M. Hilleman
CC: Larsen, Kenneth, Keefer, Mark, cityclerk@ci.stpaul.mn.us, Frank, Rachel E, Frank, Rachel E, Koplitz, Mark (MPCA), Lukes, Kristin (DEED)

May 2, 2022

VIA EMAIL

Monte Hilleman mmh@sppa.com
380 Saint Peter Street, Suite 850
Saint Paul, MN 55102-1201

RE: Approval of Response Action Plan/Construction Contingency Plan
Hillcrest Golf Course, 2200 Larpenteur Ave E, Saint Paul
MPCA Site ID: BF0001281
Billing ID: 29394
PINs: 232922120003, 232922120004, 232922120006, 232922140002, 232922410001, and
232922410002

Dear Monte Hilleman:

The Minnesota Pollution Control Agency (MPCA) staff in the Petroleum Brownfield (PB) and Voluntary Investigation and Cleanup (VIC) Programs has reviewed the Response Action Plan/ Construction Contingency Plan (RAP/CCP) submitted for the Hillcrest Golf Course site, located at the address referenced above (the Site). The RAP/CCP dated March 1, 2022, was prepared and submitted on your behalf by Braun Intertec.

The 112-acre Site was used for cultivated agriculture or grazing land prior to being developed as a golf course in the 1920s. A clubhouse is located on the northern portion of the Site and agricultural chemical storage buildings and a maintenance shop are located on the east side. Three separate petroleum releases were reported at the Site in the past and were issued the MPCA Leak IDs 5050, 6222, and 18327. All three leak sites have been issued closure by the MPCA. The golf course closed in 2017. The Saint Paul Port Authority plans to demolish the existing buildings and redevelop the Site with commercial/light industrial buildings along with low density residences, associated parking/drive areas, and recreational use.

A limited subsurface investigation was conducted at the Site in April 2019 and May of 2019. Nine soil samples were collected from soil borings and analyzed for polynuclear aromatic hydrocarbons (PAHs). Fourteen soil samples were collected and analyzed for the eight Resource Conservation and Recovery Act (RCRA) metals. Fifty-one shallow soil samples were collected from soil borings and analyzed for total mercury and two of these were also analyzed for mercury utilizing the toxicity characteristic leaching procedure (TCLP). Four soil samples were collected and analyzed for diesel range organics (DRO) and gasoline range organics (GRO). Four groundwater samples were collected; three of them were analyzed for RCRA metals, volatile organic compounds (VOCs), and DRO, and two were analyzed for PAHs and GRO. Mercury was detected in many of

the soil samples and is deemed to result from past fungicide applications at the golf course.

As part of a remedial investigation completed at the Site between June of 2020 and November 2021, nine hand auger borings and eight test pits were completed in the vicinity of the clubhouse. Twenty-nine soil samples were collected and analyzed for total mercury and 17 for PAHs and RCRA metals. The PAHs were detected in one shallow soil sample location (DSS-2/2W) at a concentration greater than the MPCA's residential soil reference value (SRV). Mercury was detected in one shallow soil sample at a concentration slightly greater than the MPCA's residential SRV; as noted above, the MPCA considers the presence of mercury in soil at the Site as attributable to past fungicide applications at the golf course.

The RAP/CCP proposes proper management and disposal of petroleum and PAH-contaminated soil encountered during construction activities. The RAP/CCP is approved, subject to the following conditions/clarifications:

1. This approval excludes contingency/response actions related to agricultural chemicals at the Site. Technical assistance for agricultural contamination is being provided by the Minnesota Department of Agriculture's Agricultural Voluntary Investigation and Cleanup (AgVIC) Program (Project number JAL101091523).
2. Confirmation soil samples shall be collected for laboratory analyses of PAHs, RCRA metals, DRO, and GRO from the base and sidewalls of excavations in areas with known soil impacts or where field observations indicate contamination may exist. Please refer to the MPCA sampling guidance for the recommended number of confirmation samples based on the size of the excavation.
3. Petroleum-contaminated soils encountered at the site, at or greater than 200 parts per million (PPM) as measured by a photoionization detector (PID), should be excavated and properly managed at an MPCA approved off-site treatment/disposal facility.
4. Petroleum-contaminated soils less than 200 PPM (PID) may be thin spread on-site under paved surfaces.
5. Petroleum-contaminated soils at or greater than 10 PPM (PID) encountered during the installation of underground utilities should be removed and properly managed as part of the RAP/CCP. If contamination remains at or above 10 PPM, a vapor barrier is required.
6. 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.
7. 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. Please include all transportation and handling manifests for such soils in the final implementation report.
8. This RAP/CCP approval is contingent on the applicant obtaining all other required state, federal, and local government permits.
9. The MPCA Brownfield Program staff does not review or approve dewatering actions, including the testing, discharge and/or treatment of groundwater, stormwater, or any other dewatering action.

An implementation report describing the completed response actions, 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 project.

Approval of this plan does not suggest that any of the costs incurred will be eligible for reimbursement from the Petro Board.

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 by email at andrew.nichols@state.mn.us or Mark Koplitz, Petroleum Brownfields Project Manager, at 651-757-2502 or by email at mark.koplitz@state.mn.us.

Sincerely,

Andrew Nichols

This document has been electronically signed.

Andrew Nichols
Project Manager
Remediation Division

Mark Koplitz

This document has been electronically signed.

Mark E. Koplitz
Project Manager
Remediation Division

AN/MEK:mh

Enclosure

cc: Shari Moore, City of Saint Paul (electronic)
Rachel Frank, Ramsey County (electronic)
Steven Heurung, Stoel Rives (electronic)
Ken Larsen, Braun Intertec (electronic)
Mark Keefer, Braun Intertec (electronic)

Attachment A

Disclaimers

Hillcrest Golf Course

MPCA Site ID: BF0001281

1. Reservation of authorities

The Minnesota Pollution Control Agency (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.

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