

March 17, 2025

VIA EMAIL

Kathryn L. Sarnecki
380 Saint Peter St, Suite 850
Saint Paul, MN 55102-1201

RE: No Further Action Determination for Soil
Approval of RAP Implementation Report
Hillcrest Golf Course (The Heights), 2200 Larpeur Ave E, Saint Paul
MPCA Site ID: BF0001281
Billing ID: 29394
PINs: 232922120003, 232922120004, 232922120006, 232922140002, 232922410001, and
232922410002

Dear Kathryn L. Sarnecki:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has been requested to provide a No Further Action Determination for releases identified at the Hillcrest Golf Course site, located at the address referenced above (the Site).

The MPCA staff has reviewed the information submitted for the Site. 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 was located on the northern portion of the Site, and agricultural chemical storage buildings and a maintenance shop were 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 (SPPA) has demolished the Site buildings and redeveloped the Site with commercial/light industrial buildings along with low- to high-density residential housing, recreational greenspace, associated parking and drive areas, and related infrastructure.

A limited subsurface investigation was conducted at the Site in April 2019 and May 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 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 mercury and 17 soil samples for PAHs and RCRA metals. Polynuclear aromatic hydrocarbons, expressed as benzo(a)pyrene equivalent, were detected in one shallow soil sample (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 use at the golf course.

For the purpose of this letter, the identified release at the Site is defined as PAHs in soil (Identified Release). This letter does not address petroleum-related compounds or agricultural chemicals. Petroleum contamination detected at the Site is under the oversight of the MPCA's Petroleum Brownfield Program, and agricultural-related contamination at the Site is under the oversight of the Minnesota Department of Agriculture's Voluntary Investigation and Cleanup Program (AgVIC).

A Response Action Plan (RAP) dated March 1, 2022, was approved by the MPCA in a letter dated May 3, 2022. A Revised RAP dated September 1, 2022, was approved by the MPCA in a letter dated September 22, 2022. Response actions completed at the Site during redevelopment activities are described in the RAP Implementation Report prepared by Braun Intertec dated May 3, 2024, and RAP Implementation addendums dated September 5, 2024, and January 13, 2025 (collectively, "Implementation Report").

Approximately 121,563 tons of contaminated and/or debris-impacted soil were excavated from across the Site and disposed of at a permitted landfill. Most of the contaminated soil was related to mercury impacts, with smaller volumes for petroleum and PAH-impacted soil. Soil confirmation samples collected from the base and sidewalls of the remedial excavations indicate that residual contamination does not pose a risk to human health or the environment.

The Implementation Report is approved. Based on a review of the information provided to the MPCA, the MPCA staff will not request any further investigation or remediation of the Identified Release at the Site. Furthermore, the MPCA is issuing a determination to take no action under Minn. Stat. sections 115B.01-115B.18, with respect to the Identified Release. Specifically, the MPCA staff will not refer the Identified Release to the U.S. Environmental Protection Agency for inclusion in the Superfund Enterprise Management System (SEMS) database, to the State Site Assessment staff for evaluation, or to the MPCA Commissioner for the placement of the Site on the Permanent List of Priorities.

This determination is subject to the following conditions and qualifications:

- This determination is based solely on the results of the soil investigation conducted on the Site. Due to the limited amount of information regarding other media, this letter does not address any conclusions or representations regarding the future need for further investigation or response actions relating to groundwater.

Please be advised that the determination made in this letter is subject to the disclaimers found in Attachment A. If you have any questions about the contents of this letter, please contact Andrew Nichols, Project Manager, at 651-297-1783 or by email at andrew.nichols@state.mn.us.

Kathryn L. Sarnecki

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Sincerely,

Amy K. Hadiaris

This document has been electronically signed.

Amy K. Hadiaris, P.G.

Supervisor

Voluntary Investigation and Cleanup Unit

Remediation Division

AKH/AN:df

Attachment

cc: Mark D. Keefer, Braun Intertec Corporation (electronic) (w/attachment)
Kenneth Larsen, Braun Intertec Corporation (electronic) (w/attachment)
Steven Heurung, Stoel Rives LLP (electronic) (w/attachment)
Shari Moore, City of Saint Paul (electronic) (w/attachment)
Ahmet Baysal, Ramsey County Environmental Health (electronic) (w/attachment)

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 the Commissioner's 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. section 115B.17, subd. 12.

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