

September 27, 2017

Scott Yonke  
Ramsey County Parks & Recreation Dept.  
2015 N. Van Dyke Street  
Maplewood, MN 55109

RE: No Further Action Determination for Soil  
Rice Creek Regional Trail, Arden Hills  
MPCA Site ID: VP26640  
Billing ID: 199943

Dear Scott Yonke:

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 Rice Creek Regional Trail site, which is a subset of the former Twin Cities Army Ammunition Plant (TCAAP). Specifically, the site is composed of four parcels, A through D, as depicted on Attachment B and which together comprise approximately 108 acres in the western portion of TCAAP (the Site).

Ramsey County is redeveloping the Rice Creek Regional Trail site for recreational use, including a public trail that runs along the north and east perimeter of the TCAAP redevelopment area (VP22891) and greenspace immediately north of the redevelopment area. The County intends to acquire three of the parcels – Parcels A, B, and D – from the federal government. The federal government will retain ownership of Parcel C but intends to grant Ramsey County a permanent easement allowing its use as part of the trail corridor.

Parcel A contains a former U.S. Army waste disposal and waste burning area that is referred to as Installation Restoration Program (IRP) Site C. The U.S. Army constructed a soil cover at IRP Site C in 2008, following excavation, stabilization, and landfill disposal of approximately 21,450 cubic yards of metals-impacted soil. The soil cover is monitored and maintained by the U.S. Army, as required under the existing Superfund land use controls for the larger TCAAP site. The federal and state Superfund programs provided closure for soil at IRP Site C in 2009. However, because the U.S. Army's soil remediation was based on site-specific industrial cleanup values (e.g. 1200 milligrams per kilogram for lead), residual contamination in shallow soil along the south and southeast perimeter of the existing soil cover remained at concentrations greater than the MPCA's industrial and/or residential soil reference values (SRV). Parcel A also contained the 120-Series Magazine Area, a collection of small buildings formerly used to store containerized explosives and self-contained explosive items. In 1998, these buildings were cleaned of any explosive residue and subsequently classified as being in a decontaminated state with respect to explosives.

Parcel B is the westernmost end of the former 1,3,5-Primer Tracer Area (135-PTA). The larger 135-PTA was used for the manufacture of primers and tracers, which are the ignition components of ballistic rifle ammunition. The portion of 135-PTA that comprises Parcel B was not intensively used for production; most of the former buildings on Parcel B were used for storage of raw and finished materials. Historical

sampling efforts had identified polynuclear aromatic hydrocarbons (PAHs) and lead in a few soil samples on Parcel B at concentrations exceeding the MPCA's industrial SRVs.

Parcel C was once occupied by the western end of a long narrow building, which served as an indoor firing range. Parcel D is an approximately 150-foot wide strip that borders the north and east side of the TCAAP redevelopment area.

Ramsey County conducted a soil investigation in selected portions of the Site in 2011, to supplement previous data collected by the U.S. Army and others. With the exception of one soil sample on Parcel B that contained an elevated concentration of PAHs, no additional impacted areas were identified during the 2011 investigation. For the purpose of this letter, the identified release at the Site is defined as lead, antimony, copper, thallium, arsenic, and PAHs in soil (Identified Release).

Soil response actions completed by Ramsey County at the Site are described in two implementation reports: *Final Documentation Report for Parcel B of the Rice Creek Regional Trail Corridor*, dated February 2017, and *Final Documentation Report for Parcels A and D of the Rice Creek Regional Trail Corridor*, dated September 2017. No response actions were necessary on Parcel C.

Ramsey County demolished all existing structures at the Site and excavated soil in discrete areas where metals and PAHs exceeded residential SRVs. The four-foot thick soil cover at IRP Site C was extended to the south and southeast to address residual contamination around the perimeter of the original cap. After completion of response actions, Incremental Sampling Methodology (ISM) was used to document that the average concentration of metals and PAHs in the upper four feet of Parcels A, B, and D met their respective residential SRVs. During ISM sampling, field screening of soil identified an area on Parcel A which exhibited staining, a petroleum odor, and elevated organic vapors. Soil testing revealed petroleum-related volatile organic compounds and lead exceeding MPCA's industrial SRVs, and a high concentration of diesel range organics. The impacts in this area were similar to other previously discovered waste disposal and waste burning areas associated with IRP Site C. Additional impacted soil was excavated from Parcel A, to depths up to 8 to 12 feet below grade in some areas, at which point the shallow water table was encountered. Altogether, approximately 12,180 cubic yards of contaminated soil was excavated from the Site during Ramsey County's response actions. Impacted soil intermixed with debris remains on a portion of Parcel A below a depth of four feet, beneath the engineered cover at IRP Site C and north of IRP Site C. An environmental covenant will be recorded on the property deed for Parcels A, B, and D when Ramsey County acquires the property.

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. §§ 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 on the Comprehensive Environmental Response, Compensation and Liability Information System list, to the State Site Assessment staff for preparation of a Hazard Ranking System score, or to the MPCA Commissioner for the placement of the Site on the Permanent List of Priorities.

This determination is based solely on the results of the soil investigation conducted at the Site. The U.S. Army continues to treat and/or monitor groundwater contamination beneath the Site, as per the requirements of the TCAAP Operable Unit 2 Record of Decision and related amendments.

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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 Amy Hاديaris at 651-757-2402 or by email at [amy.hadiaris@state.mn.us](mailto:amy.hadiaris@state.mn.us), or Shanna Schmitt at 651-757-2697 or by email at [shanna.schmitt@state.mn.us](mailto:shanna.schmitt@state.mn.us).

Sincerely,

**Gary L. Krueger**

*This document has been electronically signed.*

Gary Krueger  
Supervisor  
Site Remediation & Redevelopment Section  
Remediation Division

GLK/AH/bhj

Enclosure

ec: Beth Engum, Ramsey County  
Rick Kubler, Gray Plant Mooty  
Rick Van Allen, Bay West  
Joe Otte, Wenck  
Tom Barounis, EPA

**Disclaimers**  
**Rice Creek Regional Trail**  
**MPCA Site ID: VP26640**

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.

Site Boundary  
Rice Creek Regional Trail  
MPCA Site ID: VP26640

