



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, MN 55155-4194 | 651-296-6300 | 800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us)

August 11, 2010

Mr. Michael Hahm  
Director of Parks and Recreation  
City of Saint Paul  
400 City Hall Annex  
25 West 4th Street  
Saint Paul, MN 55102

RE: Lilydale Marina Demolition, 1700 Lilydale Road, St. Paul  
MPCA Project Number VP25740  
Lilydale Park Dump #2, 1800 Lilydale Road, St. Paul  
MPCA Project Number VP1071  
Approval of Revised Response Action Plan/Construction Contingency Plan

Dear Mr. Hahm:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the "Revised Response Action Plan and Construction Contingency Plan," (RAP/CCP) for the Lilydale Marina Demolition site and the Lilydale Park Dump #2 site, both located within Lilydale Regional Park at the addresses referenced above (the Site). The RAP/CCP, dated July 16, 2010, was prepared and submitted on your behalf by Bonestroo.

Lilydale Regional Park was first settled in the early 1800s and eventually became the small town of Lilydale. Commercial and industrial businesses associated with the town included a brick yard, an automobile salvage yard and a marina. Due to repeated flooding, the residents were relocated in the 1970s to the bluffs above what is now Lilydale Regional Park.

### *Lilydale Marina Demolition Site*

The former owner of the Lilydale Marina brought demolition material on to the property between 1953 and 1974 to raise the grade in a portion of the site. The debris forms two large waste piles, each approximately two acres in size and rising 12 to 18 feet above the surrounding terrain. Based on visual observations of exposed waste, the piles appear to be composed of concrete, bituminous pavement and dimension stone. No subsurface sampling has been conducted at the Lilydale Marina Demolition Site. The City intends to remove the demolition debris to the grade of the surrounding terrain. The concrete will be stockpiled, crushed, and beneficially reused within the park during pending park improvement projects. After the response actions are complete at the Lilydale Marina Demolition Site, the City intends to re-vegetate the area, install a perimeter fence, and use the area as an off-leash dog park.

### *Lilydale Park Dump Site*

In the mid to late 1970s Ramsey County demolished the buildings and other structures within the former floodplain community and consolidated some of the material in an on-site landfill (the Lilydale Park Dump). The landfill was placed within the footprint of the former automobile salvage yard. A test pit investigation at the Lilydale Park Dump site in May 2010 identified the presence of

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asbestos-containing material (ACM) and lead, copper, and polynuclear aromatic hydrocarbons in soil at concentrations greater than the MPCA's Recreational Soil Reference Values (SRVs). The City intends to clear a corridor through the Lilydale Park Dump to allow for the future realignment of Lilydale Road/Water Street. The RAP proposes excavation and landfill disposal of approximately 10,000 cubic yards of dump debris. The corridor will be partially backfilled with clean crushed concrete from the Lilydale Marina Demolition Site, in preparation for the construction of the realigned roadway.

The RAP/CCP is hereby approved, subject to the modification listed below:

- Analytical data from soil confirmation samples shall be compared to the MPCA's Recreational SRVs, as well as the Soil Leaching Values proposed on page 10 of the RAP/CCP.

Successful implementation of the RAP/CCP will lead to a Limited No Further Action Determination for that portion of the Lilydale Park Dump site cleaned up during the pending field work (i.e. the roadway corridor). It is my understanding that a follow-up RAP/CCP for the remainder of the Lilydale Park Dump site will be submitted in the future, prior to construction and other redevelopment activities associated with the planned picnic shelter, when funding for those activities becomes available. In the meantime, an environmental covenant will be filed for the Lilydale Park Dump site, as required by the City of St. Paul's No Association Determination dated August 5, 2010.

This letter is subject to the disclaimers found in Attachment A. If you have any questions about the contents of this letter, please contact me at 651-757-2402 or Shanna Schmitt, hydrogeologist, at 651-757-2697.

Sincerely,



Amy K. Hadiaris  
Project Manager  
Superfund, RCRA and Voluntary Cleanup Section  
Remediation Division

AKH/SS:jmp

Attachment

cc: Clinton Jordahl, Bonestroo, St. Cloud  
Alice Messer, City of Saint Paul  
Larry Carlson, Ramsey County Environmental Services  
Jeff Harthun, Dakota County Environmental Management

ATTACHMENT A  
DISCLAIMERS

Lilydale Park Dump #2  
MPCA Project Number VP1071

&

Lilydale Marina Demolition  
MPCA Project Number VP25740

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.

