



Minnesota Pollution Control Agency

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March 16, 2010

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DEPT. OF PARKS
& RECREATION

Mr. Michael Hahm
City of Lilydale
25 West Fourth Street
400 City Hall Annex
Saint Paul, Minnesota 55102

RE: Lilydale Marina Demolition, 1700 Lilydale Road, Saint Paul
MPCA Project Number VP24290 and
Lilydale Park Dump #2, 1800 Lilydale Road, Saint Paul
MPCA Project Number VP1071
Response Action Plan/Construction Contingency Plan Approval

Dear Mr. Hahm:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the "Response Action Plan and Construction Contingency Plan," (RAP/CCP) dated January 28, 2010, for the Lilydale Marina Demolition Site and the Lilydale Park Dump #2 Site, located at the addresses referenced above (the Site). The RAP/CCP was prepared and submitted on your behalf by Bonestroo.

The Lilydale Marina Demolition Site and the Lilydale Park Dump Site are part of the larger, 384 acre, Lilydale Regional Park, owned and maintained by the city of Saint Paul (the City). The Sites were developed as a residential area, known as the town of Lilydale, since at least the mid-1800s. Commercial and industrial businesses associated with the town, such as a brick yard, an automobile salvage yard and a marina, once occupied the area. The residences were relocated to the bluffs in the late 1970s. Ramsey County removed some buildings, wells, cesspools, and electrical lines in the 1970s and some of this material was consolidated and placed in an onsite landfill. The City acquired the land in 1984. Unpermitted dumping occurred until the 1990s.

Lilydale Marina Demolition Site

Subsurface sampling has not been conducted at the Lilydale Marina Demolition Site. Based on historical evidence, the dump materials are assumed to be demolition debris. The City intends to remove the demolition/dump debris to the grade of the surrounding areas. The demolition/dump area is currently approximately 12 to 18 feet above the surrounding grade. The City intends to segregate the concrete, stockpile it, crush it, and reuse it at the Lilydale Park Dump Site in the future. After the response actions are complete, the City intends to re-vegetate the area, install a perimeter fence, and use the Site as an off leash dog park.

Mr. Michael Hahn

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Lilydale Park Dump Site

Limited subsurface sampling has been conducted at the Lilydale Park Dump Site. As part of a larger subsurface assessment, two soil borings were located at the Site. Soil samples were collected and analyzed for Resource Conservation and Recovery Act (RCRA) metals, polychlorinated biphenyls (PCBs), and pesticides. Lead was detected at a concentration greater than the MPCA's Soil Reference Value (SRV) for residential use in one sample. The City intends to remove solid waste and debris (wood, tires, appliances, scrap metal, concrete with rebar, etc.) at the Site. The City plans to place approximately 11 feet of engineered fill at the Site; the engineered fill is anticipated to consist of crushed concrete and excess soil from the Lilydale Marina Demolition Site. After the response actions are complete, the City intends to realign Lilydale Road/West Water Street to the northwest and construct a picnic shelter.

An implementation report describing the RAP/CCP implementation, sampling results, and soil disposal will be prepared and submitted to the MPCA following the response actions.

The RAP is hereby approved, subject to the modifications or clarifications listed below:

1. Site cleanup goals should be set at the MPCA's Tier I Soil Leaching Values for volatile organic compounds and Recreational SRVs for other contaminants. These standards should be met in the upper four-feet of the finished site grade;
2. Confirmation samples shall be collected at the rates proposed, based on the MPCA's Draft Risk-Based Site Evaluation Manual guidance. Confirmation samples should be analyzed for VOCs, PAHs, and RCRA metals;
3. Excavated soils that are screened for stockpiling and future on-site use, should be segregated for laboratory analyses if the x-ray fluorescence (XRF) meter indicates a lead concentration greater than 200 ppm, not 300 ppm as proposed; and
4. Stabilization of soils with elevated concentrations of metals may be helpful in allowing landfill disposal of such soil, but it does not make the soil suitable for on-site reuse.

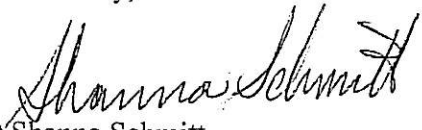
The sampling rate and laboratory analysis of the proposed additional test pits at the Lilydale Park Dump Site should be pre-approved by the MPCA VIC staff before the work begins.

The need for a deed notification or an environmental covenant on either of the Sites will be determined after the response actions and confirmation sampling are complete.

Mr. Michael Hahm
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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 Hadiaris, Project Manager, at 651-757-2402 or me, at 651-757-2697.

Sincerely,



Shanna Schmitt
Hydrogeologist
Superfund, RCRA and Voluntary Cleanup Section
Remediation Division

AH/SS:jmp

Attachment

cc: Mr. Larry Carlson, Ramsey County Environmental Services
Mr. Clint Jordahl, Bonestroo Rosené Anderlik & Associates
Ms. Virginia Palmer, City of St. Paul

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.