

ST. REGIS PAPER CO. SUPERFUND SITE

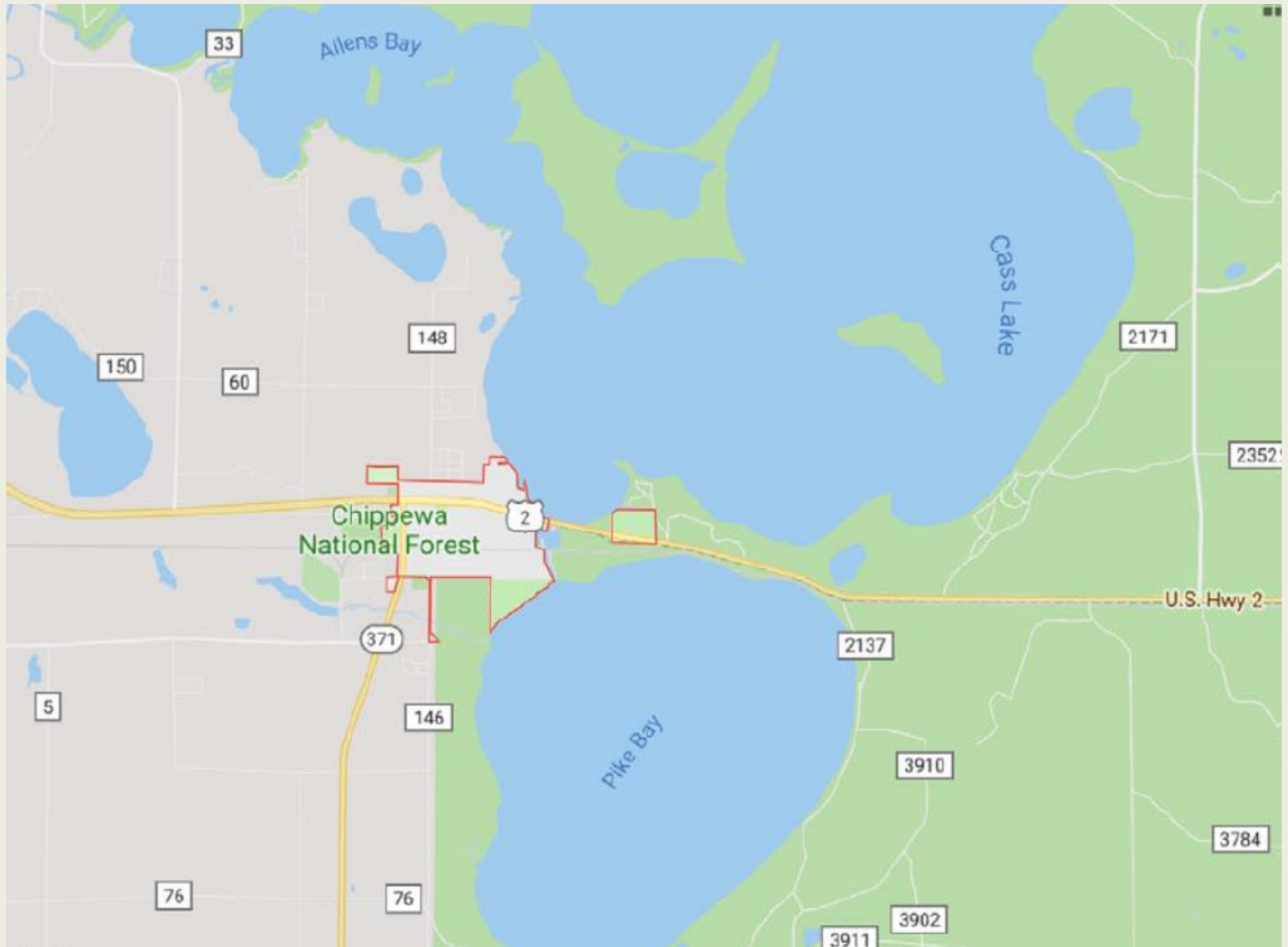
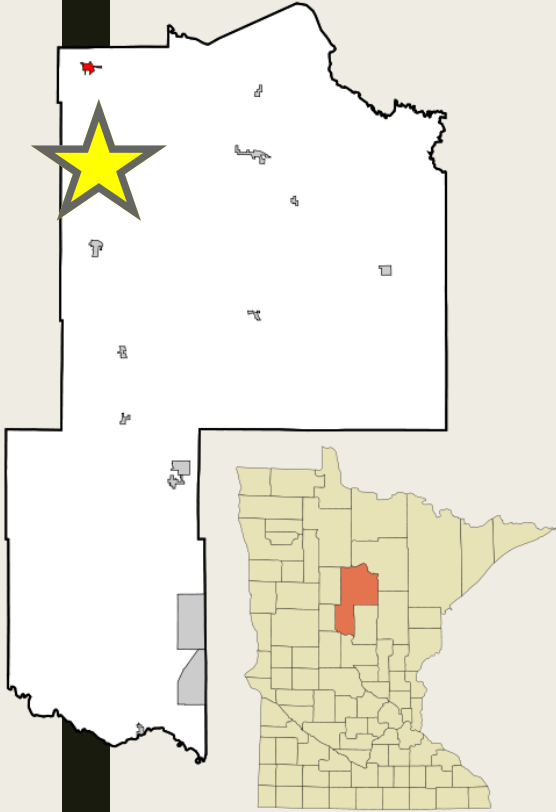
MNB State of Brownfields Update

June 7, 2019



Parkway Law
SARA J. PETERSON, ATTORNEY

City of Cass Lake



St. Regis Paper Company Superfund Site

Figure from June 2019 EPA
Proposed Plan for St. Regis Site



St. Regis Site – Timeline

Wood
treating
operations
**1957-
1985**

MPCA-lead
cleanup
oversight
**1985-
1995**

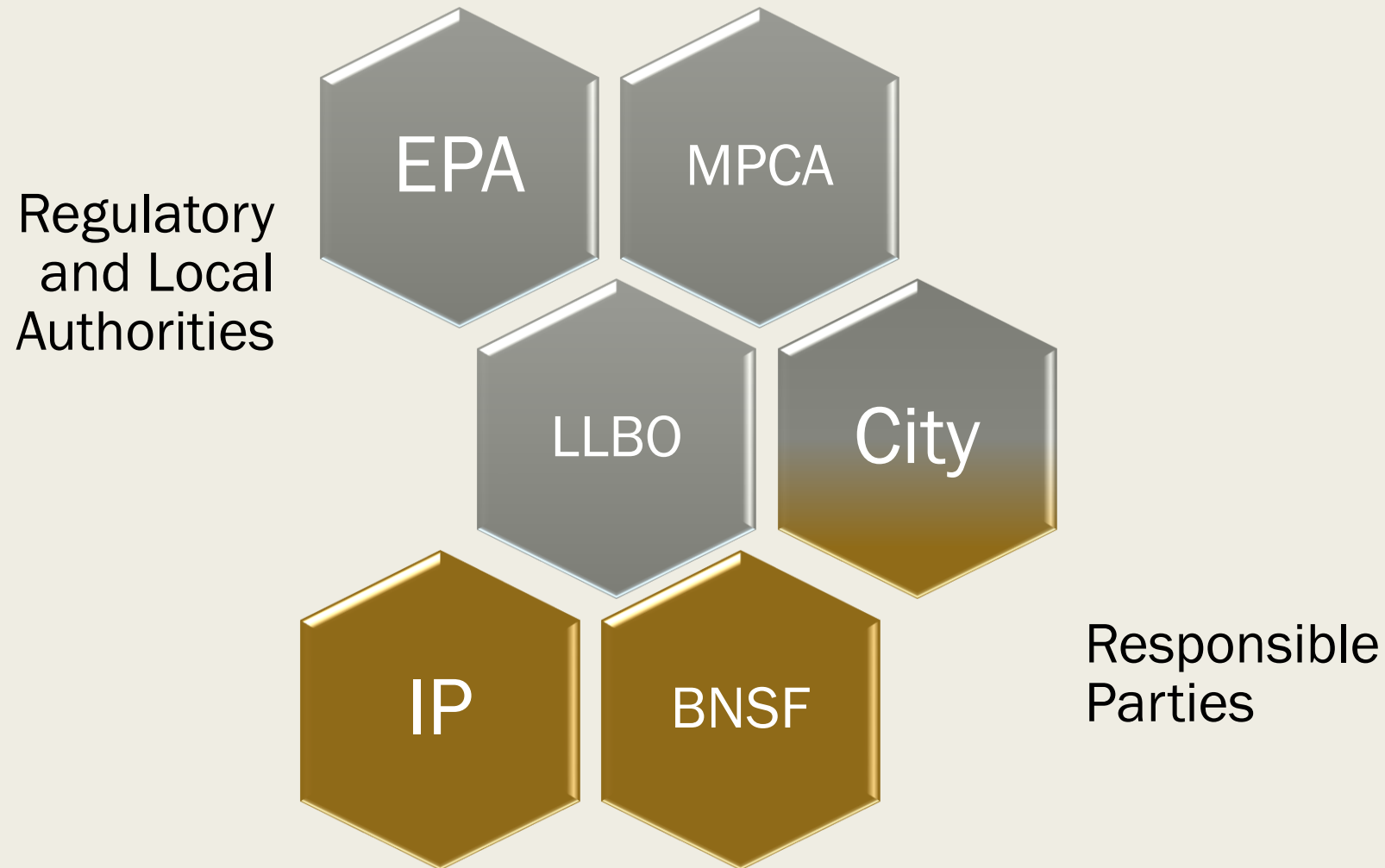
NRD
preassessment
phase
commences
2012

Listed to
NPL
1984

EPA-lead
cleanup
oversight
1995-Present

EPA lists site
as requiring
“immediate,
intense
action”
2018

St. Regis Site – Key Parties



St. Regis Site –Completed Remediation Work

- Late 1980s:
 - Visibly contaminated soil, sludge excavated and placed in on-site containment vault
 - Groundwater pump-and-treat system constructed (operation ongoing)
- 2000-2010:
 - Additional sampling leads EPA to require Human Health and Ecological Risk Assessment (HHERA)
 - Additional 3,900 T of impacted surface soil (>1,000 ppt dioxin) removed from OU1 for off-site disposal
- 2011-2018
 - HHERA approved by EPA (2011), but proposed cleanup plan shelved in favor of further soil investigation (2013-2015)
 - EPA proposes OU2 soil cleanup to 10 ppt dioxin based on LLBO Hazardous Substances Control Act as ARAR, with impacted soils kept on-site (2016)
 - Dust suppression

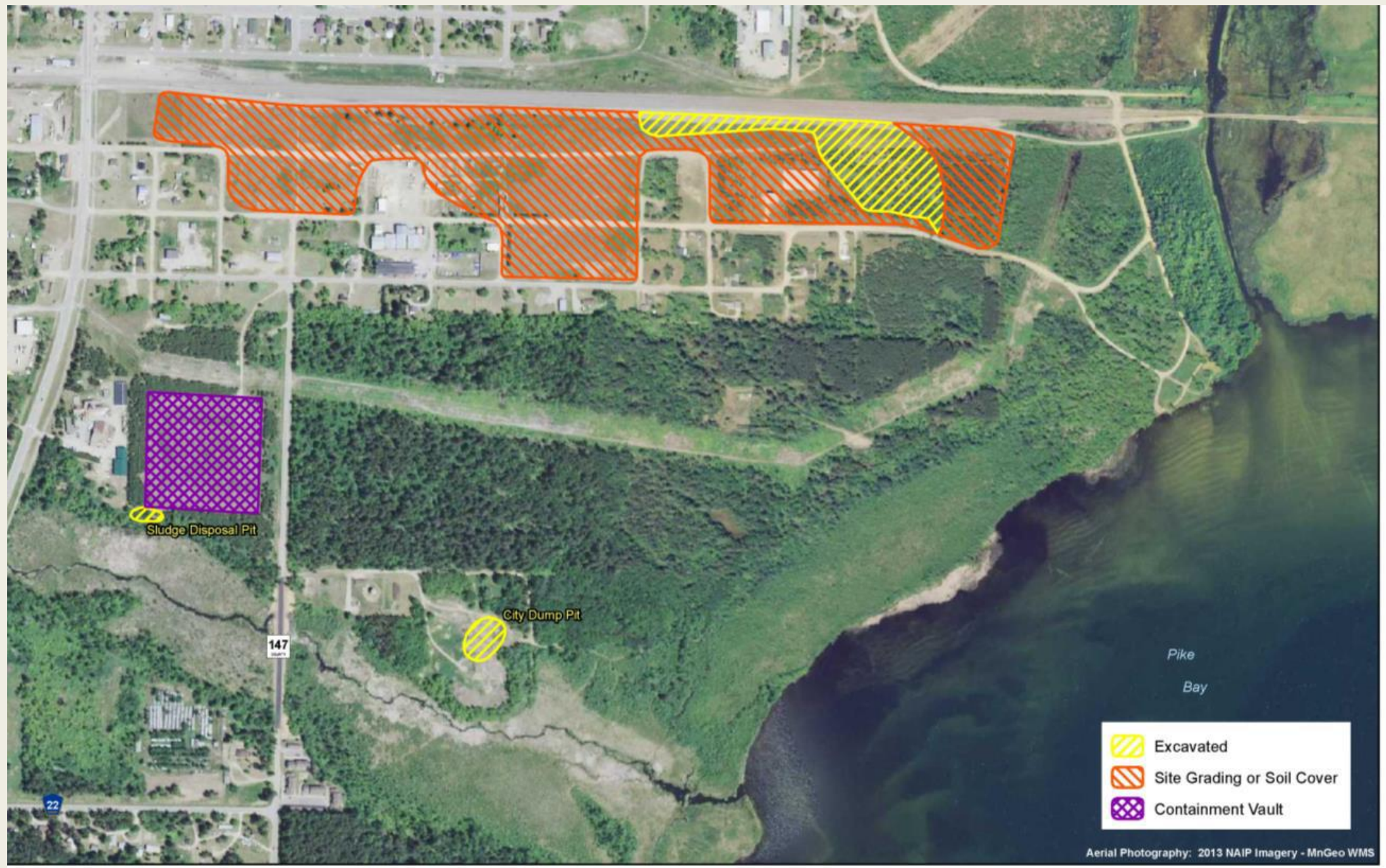


Figure from June 2019 EPA Proposed Plan for St. Regis Site

St. Regis Site – Proposed Remediation Work

Currently proposed by EPA:

- OU7 – Areas zoned residential
 - Based on Level 1 Preliminary Remediation Goal (PRG) of 10^{-6} risk level, excavate soil on OU7 with dioxin > 10ppt to average depth of 2 ft.
 - Impacted soil to be classified for on-site consolidation, containment in a RCRA Subtitle D landfill, or offsite disposal in a RCRA Subtitle C disposal facility

St. Regis Site – Further Remediation Work

Still to be addressed, per EPA:

- Contaminated groundwater in OU2
- Risk of direct contact with groundwater to utility/construction workers
- Contaminated soils in OU1, OU2 and OU3

St. Regis Site – Redevelopment Challenges

- Timing relative to remediation
- Property ownership
- Residual liability risks
- Identifying and attracting the “right” mix of development

*** Let me know if you would like to volunteer your assistance! ***

