

August 3, 2022

VIA EMAIL

Jim Janssen  
Town of Crane Lake  
P.O. Box 402  
Crane Lake Township, MN 55725

RE: Approval of Response Action Plan/Construction Contingency Plan  
Voyageurs National Park Visitors Center, 7475 Gold Coast Rd, Crane Lake  
MPCA Site ID: BF0002248  
Billing ID: 196482

Dear Jim Janssen:

The Minnesota Pollution Control Agency (MPCA) staff in the Petroleum Brownfields Program has reviewed the Response Action Plan/Construction Contingency Plan (RAP/CCP) submitted for the Voyageurs National Park Visitors Center site, located at the address referenced above (the Site). The RAP/CCP dated May 13, 2022, was prepared, and submitted on your behalf by Short Elliott Hendrickson, Inc.

The Site includes an approximate 25 vacant parcel located west of Gold Coast Road and south of Crane Lake. The Site is currently vacant with a storage shed on the southern portion of the Site. The redevelopment project includes construction of a visitors center for Voyageurs National Park on the northwestern portion of the Site and construction of a campground on the southwestern portion of the Site. The RAP provides a description of the response actions that will be taken to identify and dispose of contaminated soil at the Site.

Based on the results of the Site soil vapor sampling, elevated concentrations of petroleum volatile organic compounds (VOCs) are present in soil vapor below the northwest portion of the proposed building. Therefore, a vapor mitigation system consisting of a sub-slab depressurization system (SSDS) is required below the visitor's center. The RAP/CCP is approved, subject to the following conditions/clarifications:

1. The MPCA's review of the RAP/CCP does not include a detailed review of the proposed engineering design for the vapor mitigation system. The MPCA relies on post-installation measurement of pressure field extension (PFE) and confirmation sample results to document that the vapor mitigation system has achieved the performance criteria outlined in the MPCA guidance. The vapor mitigation system should include permanent sub-slab sampling points and diagnostic PFE testing points through the concrete slab to allow for evaluation of sub-slab vapor conditions and system diagnostics. Please refer to the MPCA's Vapor Intrusion Best Management Practices for guidance on diagnostic testing, system installation, and confirmation sampling. An environmental covenant will be required to document the affirmative obligation to operate and maintain the vapor mitigation system.

2. The MPCA Petroleum Remediation Program requests that development not occur within the in situ chemical oxidation (ISCO) treatment area until after the anticipated October completion date, and that development activities not damage the monitoring wells that will remain in place until the leak site file can be closed.
3. For petroleum-impacted soil, a minimum four-foot buffer of soil meeting unregulated fill criteria should exist in all greenspace areas, along with a vegetative cover. For non-petroleum contaminants, a vertical soil buffer meeting residential/industrial soil reference values (SRV) shall be established in all greenspace areas (four feet) and below new pavement/buildings (two feet).
4. Backfill within utility trenches at the Site shall be free of VOCs/elevated organic vapors and meet the MPCA's residential/industrial SRV.
5. Petroleum-contaminated soils encountered at the Site, at or greater than 200 parts per million (ppm) as measured by a photoionization detector (PID), should be excavated, and properly managed at an MPCA-approved off-site treatment/disposal facility.
6. Petroleum-contaminated soils less than 200 ppm PID may be thin spread on-site under paved surfaces.
7. Petroleum-contaminated soils at or greater than 10 ppm PID encountered during the installation of underground utilities should be removed and properly managed as part of the RAP/CCP. If contamination remains at or above 10 ppm, a vapor barrier is required.
8. Imported soil and excess fill targeted for off-site reuse shall be from a native source and/or meet the MPCA's criteria for [unregulated fill](#). Soils that do not meet unregulated fill criteria may not be used at the discretion of the contractor or other project personnel.
9. Any contaminated soils removed from the Site must be treated or disposed of in a method approved by the MPCA. Contaminated soils transported to an approved landfill must be in compliance with all state and local permits. Please include all transportation and handling manifests for such soils in the final implementation report.
10. This RAP/CCP approval is contingent upon the applicant obtaining all other required state, federal, and local government permits.
11. The MPCA Brownfields Program staff does not review or approve dewatering actions, including the testing, discharge and/or treatment of groundwater, stormwater, or any other dewatering action.
12. Crane Lake shall record, at its own expense, in the office of the County Recorder or Registrar of Titles, whichever is appropriate, in and for St. Louis County, an Environmental Covenant approved by the MPCA as provided in the Uniform Environmental Covenants Act, Minn. Stat. ch. 114E (Supp. 2007) (UECA). Directions and a template for the [Environmental Covenant and Easement](#) can be found on the MPCA's webpage. A copy of the proposed Environmental Covenant language shall be submitted to the MPCA staff for review and approval along with the pending Implementation Report and Town of Crane Lake shall file the Environmental Covenant within thirty (30) days after receipt of the MPCA's approval. Town of Crane Lake shall submit a copy of the Environmental Covenant as recorded to the MPCA within thirty (30) days after the Environmental Covenant is officially recorded. Town of Crane Lake shall provide notice of the Environmental Covenant to those parties to whom notice is required under the UECA.

An implementation report describing the completed response actions, sampling results, soil management and disposal, and imported soils shall be prepared and submitted to the MPCA. If the implementation report will not be submitted within one year of the date of this letter, please notify the MPCA project staff of the status of the project.

Jim Janssen  
Page 3  
August 3, 2022

Approval of this plan does not suggest that any of the costs incurred will be eligible for reimbursement from the Drycleaner Fund and/or the Petro Board.

This letter is subject to the disclaimers found in Attachment A. If you have any questions about this letter, please contact Mark Koplitz, Project Manager, at 651-757-2502 or by email at [mark.koplitz@state.mn.us](mailto:mark.koplitz@state.mn.us), or Mark Umholtz, Hydrologist, at 651-757-2308 or by email at [mark.umholtz@state.mn.us](mailto:mark.umholtz@state.mn.us).

Sincerely,

*Mark E. Koplitz*

*This document has been electronically signed.*

Mark E. Koplitz  
Project Manager  
Remediation Division

*Mark Umholtz*

*This document has been electronically signed.*

Mark Umholtz  
Hydrologist  
Remediation Division

MK/MU:df

Attachment

cc: Jennifer Force, SHE (w/attachment) (electronic)  
Mark St. Lawrence, St. Louis County Environmental Services (w/attachment) (electronic)



**Disclaimers**

**Voyageurs National Park Visitors Center**

**MPCA Site ID: BF0002248**

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 on 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. § 115B.17, subd. 12.

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