Property Description Data

Map ID # 3

Environmental Issues: Historic railroad and roundhouse

Site Name: Vacant property and snowmobile trail

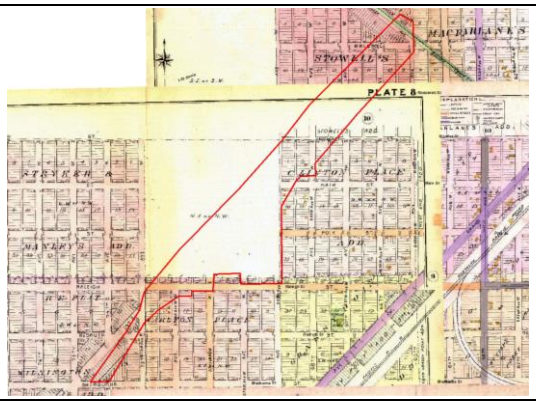
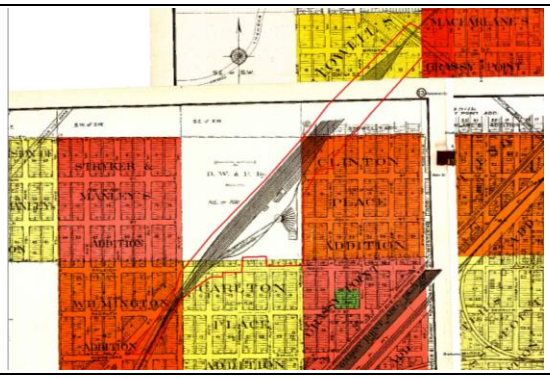
Site Address: No current address

Current Use: Overgrown property with DNR-owned snowmobile trail; no structures present at the property

Photographs

	
Looking west across the property	2012 aerial photograph from Bing Maps

Historical Summary

Year	Use	Source (↑ North)	
1902	The property is used as a residential property. The northern portion of the property is occupied by a portion of a railroad.	Historic plat map	 1902 plat map
1924-1939	The property is occupied by a northeast-southwest trending multi-track railroad. The central portion of the property is occupied by a roundhouse.	Historic plat map	 1924 plat map

Property Description Data

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Year	Use	Source (↑ North)	
1948-1953	Land use appears unchanged, although additional outbuildings are visible to the west of the roundhouse.	Aerial photographs	 1948 aerial photograph
1966-1972	With the exception of paths/roads entering the property Polk Street and 68th Ave and a square-shaped building to the west of 68th Ave, land use appears relatively unchanged.	Aerial photographs	 1966 aerial photograph
1980	With the exception of multiple paths/roads present in the northern portion of the property, land use appears relatively unchanged.	Aerial photographs	 1980 aerial photograph
1992	Railcars are not visible at the property, although the railroads remain at the site. The square-shaped building previously located in the southern portion of the property (north of Raleigh) is no longer present.	Aerial photographs	 1992 aerial photograph

Property Description Data

Map ID # **3**

Year	Use	Source (↑ North)	
1997	Previously noted railroads are no longer present and appear to be replaced with trails. Trails, extending from 66th Ave, are also visible in the northern portion of the property.	Aerial photograph	 1997 aerial photograph
2005	Structures associated with the roundhouse and associated buildings are no longer present, although their concrete foundations remain at the property. Land use in remaining portions of the property appears relatively unchanged.	Aerial photograph	 2005 aerial photograph
2010	Concrete foundations are no longer present at the property, which appears as it does today.	Aerial photographs	 2010 aerial photograph

Regulatory Review

This property was identified as the Duluth Winnipeg and Pacific Railroad and the Former Duluth Brass & Aluminum DWP Rail Yard on the RCRA-NLR (MNT280011982), VIC (VP4140, 4041, 18110), IC, LUST (13561, 1016, 3641), AST, and TRI databases.

The regulatory report indicates that the TRI listing (the most recent reporting year was 1998) was for copper, and that violations or enforcement actions were not listed for the facility. Information in the regulatory report also indicates that an Institutional Control consisting of an affidavit noting the presence of soil and groundwater impacts was issued in February 2011. Soil impacts consist of metals, PAHs, and total petroleum hydrocarbons, and groundwater impacts consist of total petroleum hydrocarbons.

Two ASTs were identified for the property. These include one 10,000-gallon fuel oil AST listed as “removed,” and one 265-gallon gasoline AST listed as “removed.”

Property Description Data

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Regulatory information identified three releases in connection with the property: Leak No. 1016, reported in December 1988 and closed July 25, 2000; Leak No. 3641, reported in December 1990 and closed on July 25, 2000; and Leak No. 13561, reported in August 2000, and closed on September 17, 2010.

Information on the MPCA website indicates that the following actions have been conducted at the property:

Action/Events	Start Date	End Date
Remedial Investigation		4/1/1995
Site Visit/Field Audit		4/28/1999
Work Plan Approval Letter		8/4/1999
Public Meeting		1/30/2002
Public Meeting		1/13/2003
Site Visit/Field Audit	10/29/2003	10/29/2003
Field Sampling Event	10/27/2003	10/31/2003
VIC General Comment Letter/request for information	10/15/2003	10/31/2003
Other Event	3/9/2004	3/9/2004
Work Plan Approval Letter	4/15/2004	4/20/2004
Phase II Approval Letter	10/1/2003	4/20/2004
Work Plan Approval Letter	10/1/2003	4/20/2004
SAP (Sampling Analytical Plan)	6/1/2003	4/20/2004
Site Visit/Field Audit	5/19/2004	5/19/2004
Field Sampling Event	5/10/2004	5/20/2004
Field Sampling Event	5/1/2007	5/31/2007
Phase II Investigation	6/1/2003	9/6/2007
Remedial Investigation	8/1/2002	9/6/2007
Phase II Approval Letter	9/6/2007	9/6/2007
Public Meeting		10/2/2007
RAP Approval Letter		10/9/2007
Site Visit/Field Audit		11/15/2007
Site Visit/Field Audit		12/6/2007
Field Sampling Event	11/1/2007	12/31/2007
Removal Action	11/1/2007	12/31/2007
Remedial Action	11/1/2007	6/30/2008
Site Visit/Field Audit	7/15/2008	7/15/2008
Public Meeting	8/26/2009	8/26/2009
Other Event	9/24/2009	9/24/2009
Public Meeting	9/24/2009	9/24/2009
RAP Approval Letter	10/21/2009	10/21/2009
RAP Approval Letter	12/1/2009	12/1/2009
Site Visit/Field Audit	12/2/2009	12/2/2009
Remedial Action	11/3/2009	12/7/2009
Site Visit/Field Audit		11/17/2010
Institutional Control Event	2/15/2011	2/22/2011
Implementation Report Approval Letter		3/15/2011
VIC Program Participation Dates	10/27/1995	3/17/2011
No Further Action Letter Sent		3/17/2011

Summary of MPCA Investigations

A brief summary regarding leak site and VIC files is presented below, with a full discussion of the reports following afterward. A map providing identified AST and UST locations, historic building locations, and excavation areas is provided at the end of the discussion.

Leak No. 3641 and 1016

Seven USTs, ranging in capacity from 250 to 18,500 gallons, were removed in December 1990. Soil investigations conducted in 1988 and 1991 to evaluate petroleum impacts related to the USTs and historic use of the property identified an approximately 9,000-cubic yard diesel-contaminated soil area near the locomotive fueling area and Tank No. 5 area. Available information indicates each of the tanks were removed; however, remedial response actions regarding the 9,000-cubic yard contaminated soil area were not identified in the leak files, and contaminated soil may remain in this area.

Leak No. 13561

One 10,000-gallon and one 265-gallon AST were removed in August 2000. A soil investigation was conducted for the release concurrently as part of VIC investigation VP 4140 (discussed below) in 2004 and additional investigation was conducted in 2007. More than 4,000 cubic yards of fill (containing cinders, clinkers, foundry sand, and demolition debris) was excavated from the vicinity of the ASTs (located to the south of the roundhouse) in December 2007 and disposed of off-site. Storm sewer sampling conducted in 2010 did not identify contaminants above method detection limits.

VP18110

The investigation was conducted in 2004 to evaluate if stream sediment samples in Stryker Bay originated from the property. The assessment concluded that Stryker Bay samples appeared to be from eroded bedrock and glacial sediment (native) and not from the property.

VP4140

Soil excavation and disposal activities were conducted to address areas of soil impacts where MPCA-established not-to-exceed (NTE) threshold values were supposed for copper, lead, and BaP equivalents. A total of 8,900 cubic yards of impacted soil was removed from nine excavation areas in 2007 (lumber house area, new furnace area, roundhouse areas, rail yard, blacksmith shops, ravine embankment), and approximately 7.5 cubic yards of non-friable asbestos-containing materials (ACM) was disposed from the property. Site restoration of these areas was completed in December 2007.

Residual lead and BaP-impacted soil fill exceeding regulatory criteria and remnant foundry sand in six areas was excavated in 2010. A total of 77.2 cubic yards of soil and foundry sand was excavated from areas 06-LC, 12-KZ, and DRB 3, and 140.5 cubic yards of soil was excavated from areas UVB-1, 13-LD, and WSB-2/2A. Site restoration was conducted in December 2009. A total of 3,308.7 tons of concrete was demolished from existing structures and removed for recycling, and approximately 29.3 cubic yards of excavated material from a 6-inch drain pipe south of a utility vault was excavated and disposed of off-site.

Based on the response actions conducted at the property for the identified release (lead, copper, PAHs, and ACM in site soil), a No Further Action (NFA) determination letter was issued on March 17, 2011. The NFA determination letter states the following:

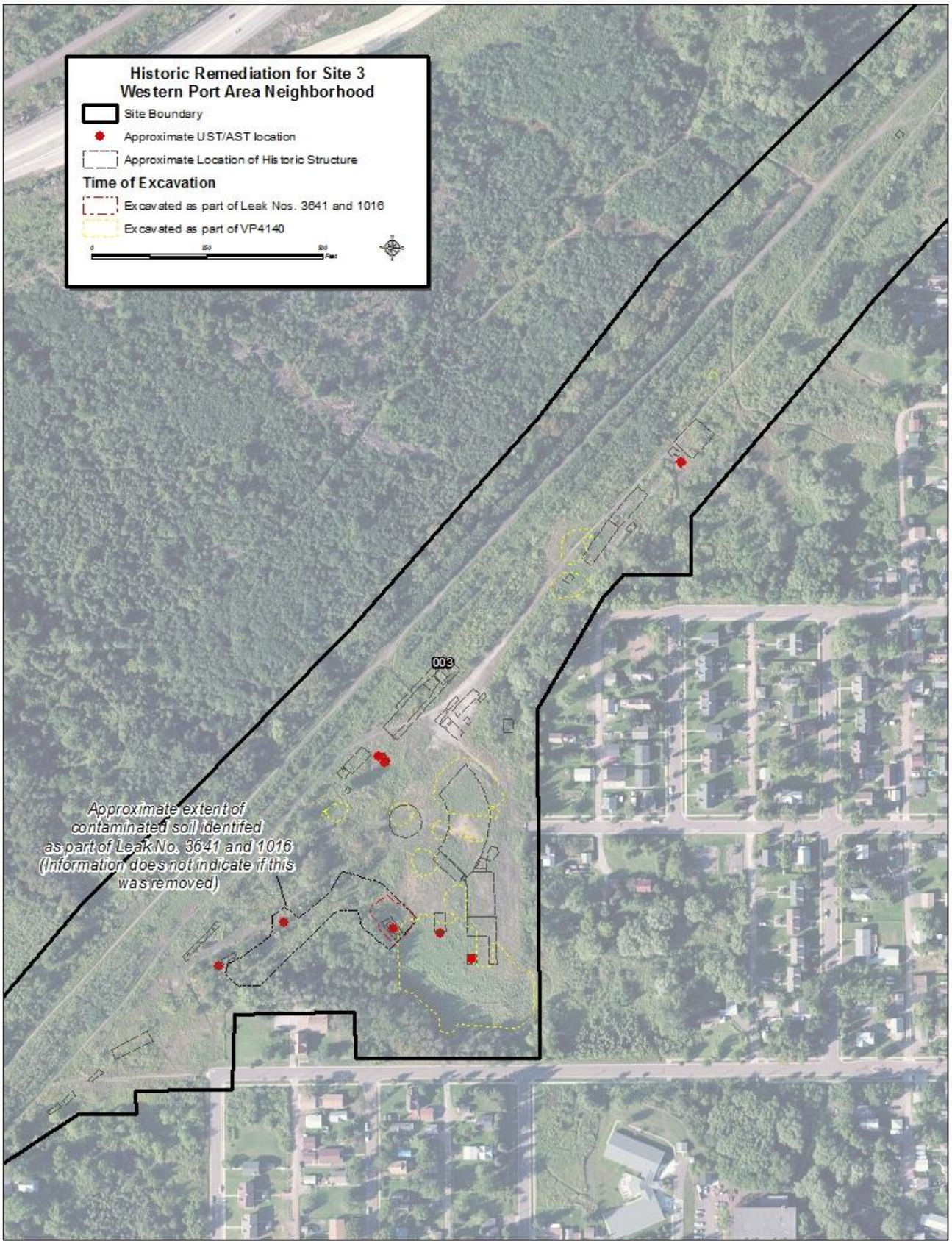
> *"Response actions were conducted by the Minnesota Department of Transportation in 2007 and 2009 and involved removing contaminated soil and the former building foundations from the Site. Approximately 9,109 cubic yards of soil contaminated with lead, copper, PAHs, ACM, and petroleum hydrocarbons were excavated and disposed of off-site. Approximately 2,077 cubic yards of the 9,109 cubic yards of soil tested hazardous for lead and was stabilized on site prior to off-site disposal. The project also included removal and disposal or recycling of about 5,209 tons of concrete from former building foundations and disposal of over 2.5 tons of solid waste, including appliances, tires, and treated wood. Final excavation confirmation soil samples were analyzed for lead, copper, and/or PHAs; with analytical results being below Industrial SRVs. Site restoration work concluded in December 2009 with the placement, grading, and seeding of a six inch layer of clean topsoil across the excavated areas.*
>
> *As specified in the Affidavit Concerning Real Property Contaminated with Hazardous Substances (Document No. 01155825) as recorded at the Office of the County Recorder in St. Louis County, Minnesota on February 22, 2011, the response actions were performed based on the assumption*

that the property would be used for industrial use. If the property use is changed, additional response actions may be required."

Based on this information, identified soil impacts (copper, lead, and BaP equivalents exceeding the NTE threshold and lead and PAH/BaP equivalents exceeding industrial SRVs) were removed by 2010. Leak site file information indicates that petroleum-impacted soil was removed from the property; however, it is unclear if an identified 9,000-cubic yard petroleum-impacted area was excavated. Additionally, response actions conducted at the property were focused on specific areas, and not all areas of the property were excavated. Future development at the property may encounter petroleum-contaminated soil or ACM, and a Construction Contingency Plan should be prepared to address the handling and disposal of unanticipated impacts during future development. Our review indicates that additional file and correspondences related to the Property likely exist. Additional Freedom of Information Act requests to obtain additional environmental information from MnDOT or the MPCA would be advisable prior to changes in land use, construction, grading, or a real estate transfer.

Property Description Data

Map ID # **3**



Reports Submitted to the MPCA

Leak No. 3641 and 1016

According to a Site Background report prepared by Barr Engineering, dated June 1993, the rail yard facilities were built in 1911 or 1912. The rail yard was generally used for switching activities, locomotive fueling and maintenance, rail car maintenance, housing of crews and track/facility maintenance supplies, and the location of DWP offices. In 1984, SWP moved operations of a newly constructed rail yard in Wisconsin and transferred the property to MnDOT. Following the transfer, the majority of the former structures and tracks were removed, and at the time of the report, remaining buildings were occupied by Duluth Brass & Aluminum Company.

According to the MnDOT Right of Way Engineer, soil affected by releases of diesel fuel were in the vicinity of the locomotive fueling station; the MPCA had DWP excavate the contaminated soil to a depth of 3 to 4 feet below grade for off-site disposal (approximately 6,200 cubic yards). There was also concern that soils in the car repair and wheel storage areas could contain PCBs as PCBs were commonly used in brake materials, however, DWP had assured MnDOT that PCBs were not used in the brake systems. When journal oil was changed at the property, the waste oil, waste pads, and oily rags were burned in a furnace located southwest of the lumber house building.

Representatives from DWP indicated coal-powered steam locomotives were used until 1957 when the railroad switched to diesel locomotives. The Duluth rail yard roundhouse was reportedly not extensively used for repair of the diesel locomotives or for changing lube oil; these activities were generally conducted at DWP facilities in Virginia, Minnesota. Use of the roundhouse for repair of steam locomotives prior to 1957 was unknown; however, DWP records did not indicate lube oil changing for steam locomotives at the property.

Lube oil from company vehicles was changed and discarded at a nearby service station, although employees occasionally changed oil in their private vehicles at the property, and one on-site company vehicle had its oil changed at the property. Waste oil from these activities was reportedly collected in 55-gallon drums and spread on the gravel roads at the property for dust control.

Two investigations were conducted to evaluate petroleum contamination at the property: one was conducted by Braun Intertec in 1988 and the other by Twin Ports Testing (TPT) in 1991. Eight soil borings were advanced by Braun to depths ranging from approximately 10 to 20 feet below grade, and two hand dug pits were placed at locations inaccessible to the drilling rig. Soil samples were analyzed for organic vapors, and three soil samples were analyzed for VOCs, TPH as gasoline and fuel oil, and selected metals. The general conclusion of the Braun investigation was that soils contaminated with fuel oil were present near an 18,500-gallon AST, the fueling station area, track area northwest of the “new” car department building, and wheel storage and maintenance area.

Seven petroleum storage tanks (ranging in capacity from 250 gallons to 18,500 gallons) were removed by J&D Enterprises between December 3 and 5, 1990. During the excavation, TPT staff sampled and analyzed soils near each tank for indications of petroleum contamination. TPT noted that soils with petroleum contamination above MPCA guidance limits were observed at three of the four locations investigated. Groundwater was present in the excavation for three of the tanks at a depth of 4 feet. No visible indications of groundwater contamination were noted, and TPT speculated that the water was perched.

A soil investigation was initiated at the time of the tank removal and continued into February and March 1991. Twenty-three soil borings were advanced in the general locations identified by Braun Intertec to evaluate soil contamination. Groundwater contamination was not specifically addressed, although groundwater was encountered in several of the borings with groundwater contamination.

Based on their results, a generalized outline of diesel-contaminated soil was identified near the locomotive fueling area and Tank No. 5 area (approximately 9,000 cubic yards).

Leak No. 13561

A Revised Limited Site Investigation (LSI) report dated August 6, 2008, indicates that six soil borings were advanced in May 2004 in the vicinity of two ASTs that were removed on August 10, 2000 (one

10,000-gallon heating oil AST and one 265-gallon gasoline AST). Twelve additional soil borings were advanced in May 2004 as part of VIC investigation VP4140, and seven additional delineation borings were advanced in May 2007 to define surficial and lateral petroleum impacts.

Field screening of soils with a PID indicated the presence of elevated organic vapor readings at depths ranging from the surface to approximately 14–16 feet bgs. Soil samples collected from intervals exhibiting contamination confirmed the presence of petroleum impacts near the tanks.

Groundwater was not encountered in the borings advanced during the LSI investigation or to a depth of 24 feet bgs, although data associated with the site metal investigation (VP4140) estimated groundwater to be approximately 35 feet bgs.

During November and December 2007, more than 4,000 cubic yards of fill material was excavated and removed from the site in the general vicinity of the two ASTs in association with an MPCA-approved Response Action Plan (RAP) for VP4140. Fill material surrounding the two ASTs (consisting of cinders, clinkers, foundry sand, and demolition asbestos containing material) was excavated down and into the lacustrine clay (up to 4 feet of material) and removed from the site and disposed off-site. A greater depth of fill material was documented south of the two ASTs along the slope of the ravine and was excavated down to the lacustrine clay.

Based on the results of the LSI, potential risks appeared to be minimal based on the following rationale:

- The source of the release (ASTs and product piping) was removed, precluding additional releases to the subsurface. Additionally, up to 4 feet of fill material was excavated and removed from the two AST locations.
- The lacustrine clay associated with the site would limit lateral or vertical migration of remaining soil impacts. Therefore, the potential for remaining soil impacts infiltrating to the underlying groundwater and/or laterally to the unnamed stream appeared to be minimal.

On April 1, 2010, Groundwater & Environmental Services (GES) mobilized to the site and collected one storm sewer water sample from the discharge location along the hillside south of the former DWP roundhouse. The sample was submitted for analysis of VOCs, GRO, and DRO. No VOCs or GRO concentrations were detected above method detection limits. A DRO concentration of 290 micrograms per liter was detected; a silica gel cleanup procedure was requested to ascertain if the concentration was associated with petroleum hydrocarbons or organic material. Results from the silica gel DRO analysis did not indicate a DRO concentration above the laboratory method detection limit.

Regulatory information indicates that the release was closed on September 17, 2010.

VP18110

A Phase II Investigation Report dated September 27, 2004, was prepared by EnecoTech to collect stream sediment samples for chemical, particle size, and petrographic evaluation from various locations along the course of the 62nd Avenue West stream. The purpose was to determine whether metals derived from the former DWP Rail Yard, which eroded from the site, were transported by the stream, and were then deposited in Styker Bay. Fourteen stream sediment samples and six stream surface water samples were collected.

Based on the findings of the assessment, it was determined that there was no evidence supporting the stream transport of sediment eroded from the former DWP Rail Site or Duluth Brass and Aluminum foundry to Stryker Bay, and that quartz sand grains observed in Stryker Bay appeared to be of local origin from eroded bedrock and glacial sediment.

VP4140

A Response Action Implementation (RAI) Report, prepared by Groundwater & Environmental Services (GES) and dated April 9, 2008, indicates that response actions were undertaken at the property based on information obtained in 2007 during a supplemental Phase II investigation and in accordance with an MPCA-approved Response Action Plan (RAP) and RAP Addendum. Objectives of Response Action

tasks were to mitigate soil in nine areas impacted by copper, lead, asbestos-containing material (ACM), and PAHs in fill material. Soil excavation and disposal activities were conducted within and adjoining the former DWP Rail Yard to address areas of soil impacts where MPCA-established Not-To-Exceed (NTE) threshold values were supposed for copper (≥1,460 mg/kg), lead (≥1,200 mg/kg), and benzo(a)pyrene equivalents (≥20 mg/kg).

The actions were conducted in order to obtain an NFA determination letter for soil and groundwater. Nine areas were excavated in the course of the RAI:

- Lumber House Area (lead only)
- "New" Furnace Area (lead only)
- Roundhouse Area East (PAH-BaP only)
- Rail Yard (culvert fill—copper and lead)
- Roundhouse Area (lead only)
- Roundhouse Area South (copper and lead)
- Blacksmith Shop (copper and lead)
- Blacksmith Shop Annex Area (copper and lead) (Response Actions conducted in this area also addressed petroleum soil impacts associated with LUST #13561.)
- Ravine Embankment toe-slope (copper only)

A total of 8,900 cubic yards of soil and approximately 7.5 cubic yards of non-friable ACM was removed from the nine excavation areas. A total of 126 confirmation samples were collected for laboratory analysis. Confirmation sampling analytical results indicated that all soil impacts above the respective NTE thresholds were excavated, and the associated soil was transported off-site for disposal. Additionally, results indicated that all known areas exceeding the MPCA Tier 2 Industrial Soil Reference Value (SRV) for lead in the upper 6 feet of soil were excavated and transported off-site.

Site restoration and seeding was completed in December 2007; 816 cubic yards of clean topsoil was transported to the site. Two composite samples analyzed for RCRA metals, VOCs, and SVOCs did not exhibit concentrations of concern.

A RAI Report Addendum, prepared by GES and dated November 16, 2010, was prepared to summarize additional activities performed by MnDOT to remove documented residual lead and BaP-impacted soil/fill exceeding MPCA Tier 2 SRVs and to document the removal of remnant foundry sands that were identified in a former roundhouse maintenance pit.

Six areas were identified as having impacted soil that exceeded lead and Bap Tier 2 Industrial SRVs:

- 06-LC Area (lead only)
- 12-KZ Area (lead only)
- DRB-3 Area/Maintenance Pit #1 (lead only)
- UVB-1 (PAH-BaP)
- 13-LD (PAH-BaP)
- WSB-2/2A (PAH-BaP)

A total of 77.2 cubic yards of soil and foundry sand was excavated from areas 06-LC, 12-KZ, and DRB-3. Excavation depths were to native lacustrine clay (ranging from 2 to 12 feet). 140.5 cubic yards of soil was excavated from areas UVB-1, 13-LD, and WSB-2/2A; excavation in these areas was conducted to 2 feet below grade. Confirmation samples were collected following excavation activities. Analytical results were less than the Tier 2 Industrial SRVs for lead and the BaP equivalent.

Site restoration was conducted in December 2009. 375 cubic yards of clean topsoil was transported to the site. One topsoil sample analyzed for RCRA metals, PAHs, and VOCs identified two PAH analytes, however, the concentrations were negligible and not indicative of contamination.

Response actions also included the removal of concrete structures that existed at the former rail yard facility (slab-on-grade concrete floors of former buildings, wall footings of the turntable, and wall footings and maintenance pits of the north and south roundhouses). A total of 3,308.70 tons of concrete was demolished and removed for recycling.

The report notes that a composite sample collected from fill material within the three south maintenance pits (MP#2–MP#4) was submitted for analysis of PAHs and RCRA metals; no indications of contamination were identified and the material was used as backfill on-site. No floor drains were observed in any of the maintenance pits.

During excavation activities along the west end of the south roundhouse, a north-south orientated utility vault was encountered. Sand fill material containing solid waste (approximately 31.9 cubic yards) was transported for off-site disposal. Analytical sampling (VOCs, PAHs, RCRA metals) of sand fill material encountered in the south half of the utility vault did not exhibit indications of contamination; the material was used as backfill at the site.

A 6-inch drain pipe was encountered at the south end of the utility vault. Backfill material with clinkers was observed extending approximately 15 feet from the drain and had a thickness of less than 1 foot. A petroleum odor was also noted in the backfill material when the drain pipe was excavated. A confirmation bottom sample collected from the base of the excavation and analyzed for VOCs, DRO, PAHs, RCRA metals, and PCBs did not exhibit indications of contamination.

Two truckloads (29.3 cubic yards) of the excavated material were disposed off-site. Elevated concentrations of PAHs, DRO, and lead were noted. Based on visual observation, and the results of the confirmation bottom sample, all clinker backfill and impacted soil were successfully removed.

Correspondence from MnDOT dated March 1, 2011, indicates an affidavit noting the appropriate response actions that were conducted, and that an NFA determination letter had been requested. The NFA determination letter was issued on March 17, 2011.

Land-Based Classifications Standards

Dimensions	Code	Classifications
Activity	5000	Travel or movement activities
Function	9900	Unclassifiable function
Structural Character	5100	Linear or network feature
Site Development Character	5300	Developed site with roads, train tracks, and other linear structures
Ownership	4200	State government

Property Attributes

Category	Comments
PID	010-4630-01640, 010-4630-01620, 010-4630-01610, 010-4630-01560, 010-4630-01680, 010-4630-01450, 010-4630-01400, 010-4630-01850, 010-0370-01730, 010-0370-01630, 010-0370-01570, 010-0370-01330, 010-0370-00010, 010-2744-00010, 010-0370-00370, 010-0370-00400, 010-0580-02770, 010-0580-02830, 010-0580-00010, 010-4220-02470, 010-0580-00170, 010-0580-00200, 010-0580-00190, 010-0580-00210, 010-4220-02630, 010-0580-00340, 010-0580-00440, 010-4220-02790, 010-4220-01990, 010-0580-00500, 010-4220-02950, 010-4220-01830, 010-4220-03110, 010-4220-03170, 010-4220-01670, 010-4220-03380, 010-4220-03410, 010-4220-01510, 010-4220-01350, 010-4220-01240, 010-4220-00730, 010-4220-00760, 010-4220-00860, 010-4220-00850, 010-4220-00780, 010-4220-00855, 010-4220-01040, 010-4220-01100, 010-4220-01090, 010-4220-01050

Property Description Data

Map ID # 3

Category	Comments
Legal Description	Lot 00, Blocks 009 and 010, Plat of Wilmington Addition to West Duluth; Lot 0022, Block 009, Plat of Wilmington Addition to West Duluth; Lot 0006, Block 009, Plat of Wilmington Addition to West Duluth; Lot 0000, Blocks 000, 004, 007, 008, 014, 015 and 016, Carlton Place Addition to Duluth; Lot 07, Block 015, Carlton Place Addition to Duluth; Lot 16, Block 016, Clinton Place Addition to Duluth; NO LOT LISTED, Blocks 002, 004 and 016, Clinton Place Addition to Duluth ; Lot 00, Blocks 001, 002 and 003, Clinton Place Addition to Duluth; Lot 03, Block 002, Clinton Place Addition to Duluth; Lot 00, Blocks 000, 006, 007, 008, 009, 010, 011, 012, 013, 014, 017, 018, 019, 020, 021 and 022, Stowells Addition to West Duluth; Lot 0009, Block 007, Stowells Addition to West Duluth; Lot 0008, Block 007, Stowells Addition to West Duluth; Lot 0006, Block 008, Stowells Addition to West Duluth; Lot 0005, Block 008, Stowells Addition to West Duluth
Acres	40.57
Parking	No parking on-site
Topography	Variable, with moderate hills throughout; Western and eastern portions slope downward to the central portion of the property
FEMA Flood Zone	Central portion of property (north of Raleigh Street) is in Zone A; 100-year floodplain; remaining portions of property are in Zone C; areas of minimal flooding
Census Tract	33
Proximity to Highway Access	Adjacent to Interstate 35, Approximately 0.2 mile from Grand Ave
Existing Buildings	None presently
Previous Investigation	Multiple VIC and LUST investigations; LUST investigations are considered closed, and VIC investigations are considered inactive