Environmental Issues: Historic manufacturing, Hallet Dock Co, historic railroad

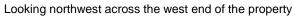
Site Name: Superior Packaging Company

Site Address: 500 S 59th Ave W

Current Use: Shipping products manufacturer

Photographs







2012 aerial photograph from Bing Maps



Looking north-northwest across the east end of the property

Historical Summary

Year	Use		Source (↑ North)
1892- 1902	No structures are depicted at the property, although a northwest-southeast trending railroad is present in the central portion of the property.	Fire insurance map, historic plat map	1892 fire insurance map

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Year	Use		Source (↑ North)
1908- 1924	Multiple railroads are present throughout the property. The northwest portion of the property contains a scale house. The east and northeast portions of the property contain a stock house and an ore dryhouse.	Fire insurance map, historic plat map	1908 fire insurance map
1930- 1961	Land use of the property appears relatively unchanged, although three additional offices are present in the north-central portion of the property, and the stock house previously noted in the northeast portion of the property is depicted as a garage.	Aerial photographs, city directories, fire insurance maps	1949 fire insurance map
1963- 1966	Land use of the property remains unchanged, although an additional office is present in the north-central portion of the property. City directory listings were not identified for the property address.	Aerial photographs, fire insurance map, city directories	1963 fire insurance map

Year	Use		Source (↑ North)
1972- 1992	The property is developed with a square-shaped warehouse corresponding to the current building. City directory listings were not identified for the property address.	Aerial photographs, city directories.	1992 aerial photograph
1996- present	Land use of the property remains relatively unchanged. Site occupants identified on city directories include the following: Maurices warehouse (1996), R Dale Co equipment refurbishment and painting (1996–2001), Hallet Dock (2001–2006), and Superior Packing Co (2006–2009).	Aerial photographs, city directories	2005 aerial photograph

Regulatory Review

This property was identified as Hallet Dock, SPC Solutions Property, and Maurice's Building on the RCRA-CESQG, AST, LUST, and VIC databases.

The following RCRA-CESQG listings were identified:

- MND985742428 (Maurice's) for ignitable waste, benzene, and tetrachloroethylene. Violations or enforcement actions were not listed.
- MNR000102467 (R Dale Inc.) for ignitable waste. A compliance evaluation inspection
 conducted in April 2004 identified two violations regarding general generator requirements and
 pre-transport requirements that resulted in the issuance of a notice of violation. According to the
 EPA Enforcement and Compliance History Online (ECHO) website, the facility is considered to
 be in compliance. No enforcement actions were listed, and no corrective actions were listed.
- MND985715234 (Hallet Dock Co #6) for ignitable waste and spent non-halogenated solvents. A
 compliance evaluation inspection conducted in October 2000 identified three violations
 regarding general generator, pre-transport, and records/reporting requirements that resulted in a
 notice of violation. According to the ECHO website, the facility is considered to be in
 compliance. No enforcement or corrective actions were listed for the facility.

The following ASTs were identified for the facility:

ID	Capacity	Contents	Status
001	2,000,000 [sic]	Unspecified	Closed in Place
1001	1,000	Fuel Oil	Active
1002	20,000	Fuel oil	Removed
1003	4700	Unspecified	Removed
1006	550	Gasoline	Removed
1007	25,000	Unregulated	Removed

Regulatory information indicates that the property is associated with Leak No 6774, reported in September 1993 and closed in January 1994. The property is also associated VIC listings VP16120, 16121, 16122, 15650, 15651, 15652, 5750, and 5751. A summary of the MPCA files is provided below:

At the time of this assessment, leak site files requested for Leak No. 6774 had not been obtained. Reports provided as part of the VIC investigation (discussed below) did not review available leak site file information.

VP16120-16122

A Phase I ESA completed by Vieau Associates and dated January 10, 2013, identified documented VOC impacts (the Identified Release consisted of benzene, toluene, ethylbenzene, xylene, and styrene) in soil and groundwater at the property in connection with the St. Louis River/Interlake/Duluth Tar (SLRIDT) Superfund site. The report also noted that a closed petroleum leaking underground storage tank release was reported for the property in 1993, and that an environmental covenant was recorded (no date was provided) for the property restricting soil disturbance and utilizing the property for industrial purposes.

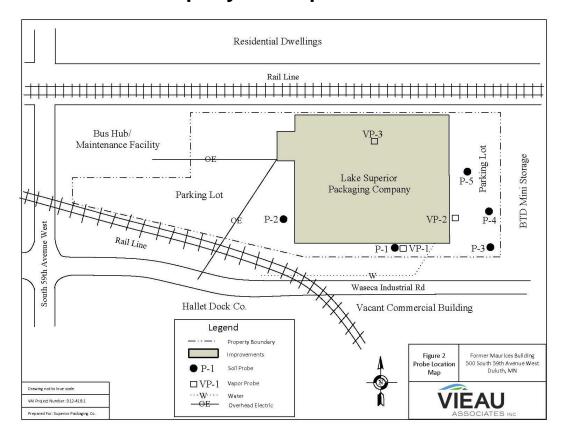
Following completion of the Phase I, Vieau Associates assisted the property occupant (Superior Packaging Company) to enroll into the Petroleum Brownfields Program to request a No Association Letter for known contamination. The MPCA required additional work to evaluate current conditions at the property and a Phase II was prepared.

The Phase II, dated March 18, 2013, indicates that five soil probes were advanced to depths ranging from 12 to 20 feet to collect soil and groundwater samples. Soil samples were submitted for analysis of VOCs, PAHS, and RCRA metals. Groundwater samples (encountered at 10.1 to 14.5 feet bgs) were submitted for analysis of VOCs, PAHs, and dissolved metals. Two building specific soil vapor gas samples and one sub-slab soil vapor gas sample were also collected and submitted for laboratory analysis of VOCs.

Significant black staining and strong petroleum odors were noted in soil sample P-2 (14–18 feet) (west side of the building); however, no petroleum or chemical odors were noted in the other samples.

Based on the results of the Phase II, Vieau Associates concluded the following:

• Low levels of VOCs, PAHs, and RCRA metals were detected in soil and groundwater on the property, including several VOCs in groundwater which exceed the Minnesota Department of Health (MDH) established Health Risk Limits (HRLs) and two compounds that exceeded the groundwater screening values for vapor intrusion pathway (GWISV). Based on the industrial land use of the property and absence of any potential receptors (such as potable water wells) on the site, the identified contaminants in groundwater are not considered to be an imminent threat to human health or the environment. Based on the results of soil vapor sampling conducted, it does not appear as though vapor intrusion is a concern for the property. It should be noted that the building contains a concrete floor slab that is approximately 8–10 inches thick. The floor slab appears to be in good condition with no obvious cracks, joints, or other routes to the subsurface.



Land-Based Classifications Standards

Dimensions	Code	Classifications
Activity	3110	Primarily plant or factory-type activities
Function	3400	Miscellaneous manufacturing
Structural Character	2621	Assembly and construction-type plants
Site Development Character	6000	Developed site with buildings
Ownership	1000	No constraints, private ownership

Property Attributes

Category	Comments
PID	010-4500-04970, 010-4500-04785, 010-4500-04770, 010-0130-00300, 010-0130-00292, and 010-0130-00290
Legal Description	Lot 00, Blocks 281 and 282, West Duluth 4th Division; Lot 00 Block 00, Rearrangement Auditors Plat West Duluth
Acres	3.88
Parking	Parking on property
Topography	Level
FEMA Flood Zone	Zone C, areas of minimal flooding
Census Tract	158
Proximity to Highway Access	Within 0.52 mile of Interstate 35
Existing Buildings	One warehouse building constructed by early 1960s
Previous Investigation	VIC listings 16120–16122, considered "inactive"