

# **Phase I Environmental Site Assessment**

Vacant Parcel  
315 Larch Street  
Saint Paul, Minnesota

*Prepared For*

**Ramsey County**

DRAFT

Project B1603228  
May 6, 2016

Braun Intertec Corporation

May 6, 2016

Project B1603228

Mr. Paul Scharf  
Ramsey County Property Tax Records & Election Services  
90 West Plato Boulevard  
Saint Paul, MN 55107

Re: Phase I Environmental Site Assessment  
Vacant Parcel  
315 Larch Street  
Saint Paul, Minnesota

Dear Mr. Scharf:

In accordance with your written authorization, Braun Intertec Corporation conducted a Phase I environmental site assessment (ESA) of the above-referenced site (Site). The objective of the Phase I ESA was to evaluate the Site for indications of recognized environmental conditions and to assist in satisfying All Appropriate Inquiries (AAI) standards and practices. The Phase I ESA was conducted in general conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E1527-13 and 40 Code of Federal Regulations (CFR) Part 312.

The Phase I ESA was prepared on behalf of, and for use by Ramsey County. No other party has a right to rely on the contents of the Phase I ESA without written authorization by Braun Intertec. The Phase I ESA was prepared in association with the potential sale of the Site. Please refer to the attached report for the scope, methods and conclusions of our assessment.

We appreciate the opportunity to provide our professional services for you for this project. If you have any questions regarding this letter or the attached report, please contact Kevin Hoffman at 952.995.2458 or Mark Ciampone at 651.487.7015.

Sincerely,

BRAUN INTERTEC CORPORATION

Kevin J. Hoffman  
Senior Scientist

Mark A. Ciampone, PG  
Associate Principal – Senior Scientist

Attachment:  
Phase I Environmental Site Assessment Report

AA/EOE

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## Executive Summary

Braun Intertec Corporation conducted a Phase I Environmental Site Assessment (ESA) of the vacant parcel located at 315 Larch Street in Saint Paul, Minnesota (Site) in general conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E1527-13 and 40 Code of Federal Regulations (CFR) Part 312.

The Site consisted of vacant land from prior to 1929 until the mid-1960s. The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant. The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000.

At the time of the reconnaissance, the Site consisted of a vacant grass-covered parcel totaling approximately 0.59 acres. No improvements such as buildings or paved surfaces were observed at the Site at the time of our reconnaissance.

This assessment identified no recognized environmental conditions in connection with the Site, with the exception of the following:

- The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant. Considering the past use of the Site as a foundry and a salvage yard, it is our opinion the past uses at the Site have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered recognized environmental conditions.
- The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000. A closed release (Leak #3504) with groundwater contamination at an adjoining property south of the Site (300 Larch Street) is listed in the regulatory report. An active VIC site (VP28030) is listed in the regulatory report at an adjoining property south of the Site (807 Farrington Street). It is our opinion the past uses and reported releases at the adjoining properties have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered a recognized environmental condition for the Site.

This assessment identified no controlled recognized environmental conditions in connection with the Site.

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## A. Introduction

### A.1. Purpose

Braun Intertec Corporation received authorization from Mr. Paul Scharf of Ramsey County (Client) to conduct a Phase I Environmental Site Assessment (ESA) of the vacant parcel located at 315 Larch Street in Saint Paul, Minnesota (Site). The objective of the Phase I ESA was to evaluate the Site for indications of recognized environmental conditions and to assist in satisfying All Appropriate Inquiries (AAI) standards and practices. The Phase I ESA was conducted in general conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E1527-13 and 40 Code of Federal Regulations (CFR) Part 312. No intentional deviations from the ASTM Practice E1527-13 were made in conducting this Phase I ESA for the Site. The Phase I ESA was prepared on behalf of, and for the use by Ramsey County (User) in accordance with the contract between Ramsey County and Braun Intertec, including the Braun Intertec General Conditions. No other party has a right to rely on the contents of the Phase I ESA without written authorization by Braun Intertec. All authorized parties are entitled to rely on the attached report according to our contract with Client, and under the same terms, conditions and circumstances. Please note that our contract with Client may contain a limitation of our total liability. If so, such limitation also applies to all those receiving this permission.

According to the User, the Phase I ESA was conducted in association with the potential sale of the Site.

The purpose of this Phase I ESA was to evaluate the Site for indications of “recognized environmental conditions.” A recognized environmental condition is defined by ASTM Practice E1527-13 as: “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment, 2) under conditions indicative of a release to the environment, or 3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.”

In addition, a “controlled recognized environmental condition” is also a recognized environmental condition. A controlled recognized environmental condition is defined by ASTM Practice E1527-13 as “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.”

## A.2. Scope of Services

Services provided for this project included:

- Preparing a description of the Site location, current use and improvements, and surrounding area.
- Preparing a general description of the topography, soils, geology, and groundwater flow direction at the Site.
- Reviewing reasonably ascertainable and practically reviewable regulatory information published by state and federal agencies, health, and/or environmental agencies.
- Reviewing the history of the Site, including aerial photographs, fire insurance maps, directories, and other readily available Site development data.
- Conducting a reconnaissance and environmental review of the Site, including observations of the Site for indications of hazardous materials, petroleum products, polychlorinated biphenyls (PCBs), wells, storage tanks, solid waste disposal, pits and sumps, and utilities.
- Conducting an area reconnaissance, including a brief review of adjoining property uses and pertinent environmental information noted in the Site vicinity.
- Interviewing current owners and/or occupants of the Site and accessible past Site owners, operators and/or occupants, as available.
- Interviewing local government officials or agencies having jurisdiction over hazardous waste disposal or other environmental matters in the area of the Site, as available.
- Reviewing previous environmental reports prepared for the Site, if provided.
- Preparing a written report of our methods, results, and conclusions.

The Standard Scope of the ASTM Practice E1527-13 is not intended to provide a universal analysis of potential environmental risks and hazards. This assessment included no analysis of non-standard scope environmental risks and hazards unless otherwise listed above. Analysis of other non-standard scope issues by Braun Intertec would require additional contractual arrangements.



This assessment does not include vapor encroachment screening as defined in ASTM Practice E2600-10, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*. ASTM Practice E2600-10 is not a requirement or component of “all appropriate inquiry,” but a tool for evaluating vapor migration. Its results are not determinative of whether hazardous substances from a release are or may be present at the property for the sake of “all appropriate inquiry” or ASTM Practice E1527-13. An ASTM Practice E2600-10 vapor encroachment screen is not within the scope of this Phase I ESA and will not be conducted unless specifically requested by the User. However, vapors present or likely present from hazardous substances or petroleum products are considered no differently than hazardous substances or petroleum products present or likely present as a result of a release to the environment. Therefore, while a vapor encroachment screening per the ASTM Practice E2600-10 standard is not part of this assessment, the potential for impacts to the property from vapor migration that is a result of a release of hazardous substances and/or petroleum products to the environment will be considered when assessing for the presence of a recognized environmental condition as defined by ASTM E1527-13.

### **A.3. User-Provided Information**

The purpose of this section is to describe tasks to be performed by the “User.” The “User” as defined by ASTM Practice E1527-13, is “the party seeking to use ASTM Practice E1527-13 to complete an environmental site assessment of the property. A User may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager.”

As stated in 40 CFR 312 (the rule), the Brownfields Amendments provide important liability protections for Users who qualify as contiguous property owners, bona fide prospective purchasers, or innocent landowners. To meet the statutory requirements for any of these Landowner Liability Protections (LLPs), a User must meet certain threshold requirements and satisfy certain continuing obligations. To qualify as one of the three LLPs, the User must perform “all appropriate inquiries” (AAI) on or before the date on which the User acquired the Site. The rule defines AAI, which includes inquiries and activities performed by the User and an environmental professional (EP).

The rule allows (but does not mandate) the User performing AAI to conduct inquiries or activities that may include searches for environmental liens, assessments of any specialized knowledge on the part of the User, an assessment of commonly known or reasonably ascertainable information about the Site, and an assessment of the relationship of the purchase price to fair market value. However, if the User performing AAI conducts one or more of these inquiries and/or activities, the rule allows (but does not mandate) that the User may communicate information gathered from these inquiries and/or activities to their EP to identify a possible recognized environmental condition.

Braun Intertec provided a User Questionnaire to the Client as a means to communicate information gathered from these inquiries and/or activities to the EP. The User may elect whether to communicate this information to the EP and/or to communicate this information to the EP by other means (e.g., through conversation or submission of documents). As indicated in our contract, if multiple Users are requesting reliance on the Phase I ESA, the Client was responsible for forwarding a copy of the questionnaire to all appropriate entities (collectively the User).

User-supplied information is discussed in applicable sections of this report. Sections A.4.a through A.4.f present any information communicated to us by the User that the EP has determined to indicate the possible presence or likely presence of a recognized environmental condition.

#### **A.3.a. Environmental Liens**

An environmental lien is a charge, security, or encumbrance, upon title to the Site to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of environmental issues at the Site.

The User was not aware of a record or awareness of environmental liens recorded against the Site.

#### **A.3.b. Activity and Use Limitations**

Activity and Use Limitations (AULs) are legal or physical restrictions or limitations on the use of, or access to, a Site to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, and/or surface water on the Site or to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. AULs, which may include institutional and/or engineering controls, are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil, groundwater, and/or surface water on the Site.

The User was not aware of a record or awareness of AULs recorded against the Site.

#### **A.3.c. Specialized Environmental Knowledge**

Specialized environmental knowledge includes any information and/or experience related to the Site or adjoining properties including, but not limited to, any obvious indicators that point to the presence or likely presence of environmental issues at the Site.

The User was not aware of specialized environmental knowledge for the Site.

#### **A.3.d. Valuation Reduction for Environmental Issues**

Valuation reduction for environmental issues includes the relationship of the purchase price to the fair market value of the property.

According to the User, the Site was forfeited to the State of Minnesota for unpaid property taxes.

#### **A.3.e. Commonly Known or Reasonably Ascertainable Information**

Commonly known or reasonably ascertainable information includes information about the Site that generally is known to the public within the community where the Site is located and can be easily sought and found from individuals familiar with the Site or from easily attainable public sources of information.

In a document provided by the User, there is a line-item cost on an invoice for the removal of hazardous waste from the Site.

#### **A.3.f. Degree of Obviousness**

The User must consider the degree of obviousness of the presence or likely presence of releases or threatened releases at the Site and the ability to detect releases or threatened releases by appropriate investigation.

The User was not aware of any obvious indications of the presence or likely presence of releases or threatened releases at the Site besides the past use of the Site as a junk yard.

### **B. Records Review**

The purpose of the records review is to obtain and review records that will help identify recognized environmental conditions in connection with the Site. We consulted only those regulatory and historical sources that were readily available, practically reviewable, and likely to be useful to develop a history of previous uses of the Site and surrounding area within the time and cost constraints of this Phase I ESA.

#### **B.1. Site Location**

We accessed various documents and online sources to obtain Site location information. The following is a summary of our findings:

<b>Address:</b>	315 Larch Street
<b>City:</b>	Saint Paul
<b>County:</b>	Ramsey
<b>State:</b>	Minnesota
<b>Property Identification Number:</b>	252923430102
<b>Construction Year:</b>	N/A
<b>Owner:</b>	State of Minnesota Trust Exempt
<b>Legal Description:</b>	Lot 15, Block 1, Pacific Addition to Saint Paul
<b>Latitude:</b>	44.965 North
<b>Longitude:</b>	93.112 West
<b>Section, Township, Range:</b>	NE 1/4 of the SW 1/4 of the SE 1/4 of Section 25, Township 29 North, and Range 23 West
<b>Elevation:</b>	850 feet above mean sea level
<b>Size:</b>	0.59 acres

A Site location map and Site sketch are attached in Appendices A and B, respectively. Information obtained from the Ramsey County Property Information web page is attached in Appendix C.

#### **B.1.a. Geology**

The unconsolidated sediment in the Site vicinity are Pleistocene age Grantsburg Sublobe meltwater stream sediment deposits that consist of medium to coarse sand with pebbles. Sand predominantly quartz; and can be distinguished from Superior lobe sand by presence of Cretaceous shale, limestone, and rare lignite grains. Shale and lignite grains are common in coarse-sand fraction and may be concentrated in layers (Patterson, 1992).

The uppermost bedrock unit in the Site vicinity is the Middle Ordovician, Platteville and Glenwood Formations (Mossler and Bloomgren, 1992). The Platteville Formation is described as fine-grained dolostone and limestone underlain by thin, green, sandy shale (3-5.5 feet thick) of the Glenwood Formation. The depth to bedrock in the Site vicinity is approximately 50 feet below land surface (Mossler and Cleland, 1992).

#### **B.1.b. Hydrogeology**

The depth to groundwater in the vicinity of the Site is approximately 35 feet below land surface. According to published geologic information, the regional groundwater flow direction within the unconsolidated deposits in the Site vicinity is generally southeast (Kanivetsky and Cleland, 1992). However, the local direction of groundwater flow may be affected by nearby streams, lakes, wells, and/or wetlands and may vary seasonally.

The Site-specific groundwater flow direction was not determined through direct measurement during this Phase I ESA. Additional field investigation, beyond the Scope of Services of this Phase I ESA, would be required to determine this information.

## **B.2. Regulatory Report**

We obtained regulatory database information pertaining to the Site and surrounding area from Environmental Data Resources, Inc. (EDR). The EDR report is a compilation of records of facilities that are included on current federal and state environmental regulatory databases. The databases were searched based on the specified minimum search distances from the Site as established by ASTM Practice E1527-13.

The EDR report also includes a description, source reference, date of acquisition, and the specified approximate minimum search distance criteria for each database and list. A copy of the EDR report is attached in Appendix D.

We reviewed the EDR report to identify records that indicate known or potential recognized environmental conditions on the Site and/or surrounding area and to evaluate the likelihood for those recognized environmental conditions to impact the Site based on the information obtained in this Phase I ESA.

### **B.2.a. Site**

The Site is listed on the following federal and/or state databases in the EDR report:

- EJ Liquidation/Midwest Brass & Aluminum, 315 Larch Street. The EDR report indicates the Site is listed on the Resource Conservation and Recovery Act Conditionally-Exempt Small Quantity Generator (RCRA-CESQG), Superfund Enterprise Management System Archive (SEMS-ARCHIVE), and Spills databases. Identification of the Site on the RCRA-CESQG database indicates that the Site is required to register their hazardous waste activity under RCRA. According to the SEMS-ARCHIVE information, following a preliminary assessment completed on August 1, 1984, the Site was assigned a low priority for further assessment. A second preliminary assessment was completed at the site on February 7, 1990. It was determined the Site did not qualify for the National Priority List based on the existing information. A spill was reported to the Minnesota Pollution Control Agency (MPCA) on September 7, 2012. The caller who reported the spill was involved with cleaning up the Site prior to demolition. The caller reported that elemental mercury was discovered inside the building. A response was completed by the MPCA on December 1, 2012.

### **B.2.b. Adjoining Properties**

The following facilities are identified on properties that adjoin the Site in the EDR report:

- D&B Auto, 323 Larch Street, located on an adjoining property west of the Site. The EDR report indicates the facility is listed on the RCRA Non-Generator (NonGen) of hazardous waste and EDR's Historical Auto Station. Identification on the RCRA-NonGen database indicates that the facility no longer generates hazardous waste. The EDR report indicates L&T Auto Repairs was located at the facility in 2003.
- Concrete Accents/J.R. Walker & Sons, 300 Larch Street, located on an adjoining property south of the Site. The EDR report indicates the facility is listed on the RCRA-NonGen, aboveground storage tank (AST), underground storage tank (UST), and leaking underground storage tank (LUST) databases. Identification on the RCRA-NonGen database indicates that the facility no longer generates hazardous waste. According to the EDR report, one active 600-gallon diesel AST, one removed 10,000-gallon gasoline UST, one removed 8,000-gallon diesel UST, and one removed 8,000-gallon gasoline UST are registered at the facility. A release at the facility was reported to the MPCA and assigned Leak #3504. Groundwater contamination was reported associated with this release. The MPCA closed Leak #3504 on December 23, 1991.
- Mac's Roll-Off Service, 815 Farrington Street, located on an adjoining property west of the Site. The EDR report indicates the facility is listed on the RCRA-CESQG database. Identification on the RCRA-CESQG database indicates that the facility is required to register their hazardous waste activity under RCRA and does not imply that a release has occurred at the facility.
- Fuel Oil Service Company, 290 Atwater Street, located on the adjoining property north of the Site. The EDR report indicates the facility is listed on the AST, UST, leaking aboveground storage tank (LAST), and LUST databases. According to the EDR report, five removed 12,000-gallon ASTs and three gasoline USTs ranging between 1,020 gallons and 4,000-gallons are registered at the facility. A release from an UST and AST was reported to the MPCA on January 14, 1992 and assigned Leak #4954. Groundwater contamination was reported with this release. The MPCA closed Leak #4954 on June 30, 1998.
- Corval Group, Inc., 807 Farrington Street, located on an adjoining property south of the Site. The EDR report indicates the facility is listed on the RCRA-CESQG and Voluntary Investigation and Cleanup (VIC) databases. Identification on the RCRA-CESQG database indicates that the facility is required to register their hazardous waste activity under RCRA. The facility enrolled

in the VIC Program and was assigned VP28030. No additional information regarding the issuance of assurance letters by the MPCA or contaminants identified at the facility were provided in the EDR report. The VIC listing is active.

- Kath Oil/Afterhours Mobile Services, 290 Larch Street, located on an adjoining property southeast of the Site. The EDR report indicates the facility is listed on the RCRA-CESQG, UST, and EDR's Historical Auto Station databases. Identification on the RCRA-CESQG database indicates that the facility is required to register their hazardous waste activity under RCRA. According to the EDR report, one removed 2,000-gallon UST is registered at the facility. According to the EDR Historical Auto Station database, Twin City Fleet Repair was located at the property in 2010, 2011, and 2012.

#### **B.2.c. Surrounding Area**

We reviewed the EDR report for facilities located beyond adjoining properties that may indicate a release or likely release of hazardous substances and/or petroleum products that may impact the Site. Based on factors that include regulatory status, distance from the Site, and/or location relative to the regional groundwater flow direction, as referenced in Section B.1., no facilities are identified in the EDR report that warrant further consideration as potential recognized environmental conditions.

#### **B.2.d. Unmapped Sites**

The EDR report identified unmappable sites, which, because of poor or inadequate address information could not be mapped by EDR. Using online mapping resources, all unmappable sites were identified outside the appropriate minimum search distances for the Site or could not be located based on the information provided. It is our opinion the unmappable sites do not warrant further consideration as potential recognized environmental conditions.

### **B.3. Additional Federal, State, and Local Environmental Records**

To enhance and supplement the regulatory database report, we obtained or reviewed practically reviewable or reasonably ascertainable local City and/or County records and/or additional state records to identify records that indicate known or potential recognized environmental conditions at the Site.

#### **B.3.a. City of Saint Paul**

We retained Historical Information Gatherers, Inc. (HIG) to conduct a file review of the City of Saint Paul (City) files regarding land-use activities at the Site. A copy of the files received from HIG are attached in Appendix E.

According to the City files reviewed, a building was built at the Site in 1967 and an addition was constructed in 1977 for Midwest Brass and Aluminum. The Saint Paul fire department responded to a fire at the Site on April 14, 1972. A fire was found in a truck and several steel storage sheds in a scrapyard used for electrical equipment. The Saint Paul fire department responded to another fire at the Site on April 14, 2000. The occupant at the time of the 2000 fire was EJ Liquidations, which bought and sold electrical goods. The fire was located outside in the yard adjacent to a flatbed truck and within some pallets and boxes. On October 21, 2004, the Saint Paul fire department responded to a fire in an outdoor storage container that was caused by a spark from a cutting torch. On March 9, 2005, the Saint Paul fire department responded to a fire in a portion of the building at the Site referred to Building #3 that was caused when an employee accidentally knocked over a gasoline container, which spilled onto the floor and ignited. The buildings at the Site were demolished in November 2012.

### **B.3.b. Well Databases**

The Minnesota Geological Survey (MGS) maintains the Minnesota County Well Index (MCWI), which is a limited database of water well records. The MCWI was accessed through the Minnesota Department of Health (MDH) website. Not all private water wells are listed in that database.

Our review of the MCWI database revealed no documentation of water wells located on the Site.

### **B.3.c. State Regulatory Web Pages**

We accessed Minnesota Department of Agriculture (MDA) "What's In My Neighborhood" Agricultural Interactive Mapping web page and the MPCA's "What's In My Neighborhood" web page for information regarding the potential for the Site, adjoining properties, or surrounding properties to be of environmental concern that were not identified in the regulatory database report.

We did not identify facilities on the state regulatory web pages we accessed that were not already listed in the EDR report discussed in Section B.2 above.

## **B.4. Regulatory Agency File and Records Review**

The purpose of the regulatory file review is to obtain sufficient information to assist in determining if a recognized environmental condition, historical recognized environmental condition, controlled recognized environmental condition, or a *de minimis* condition exists at the Site in connection with a regulatory report listing.



Based on our review of the regulatory report, it is our opinion that a regulatory agency file and records review is not warranted due to factors that include regulatory status, distance from the Site, and/or location relative to the regional groundwater flow direction, as referenced in Section B.1.

## **B.5. Historical-Use Information**

The objective of the historical-use information review was to develop a history of the previous uses of the Site and surrounding area, and to help evaluate the likelihood of past uses having led to recognized environmental conditions in connection with the Site. The following table summarizes the historical information reviewed. Details regarding the information reviewed are provided in the sections below.

Historical Source	Provided By:	Years Available
Historical Maps	EDR	1903, 1910, 1925, 1927, 1955, and 1967
Topographic Maps	Braun Intertec's Internal Library	Published in 1969, Revised in 1993
Aerial Photographs	HIG	1923, 1940, 1947, 1953, 1958, 1966, 1974, 1980, 1985, 1991, 1994, 2000, 2004, 2009, and 2012
City Directories	HIG	

### **B.5.a. Fire Insurance Maps**

Copies of the fire insurance maps are attached in Appendix F. The following is a summary of the information reviewed.

The Site is vacant on all of the fire insurance maps reviewed. The adjoining properties are vacant until the 1967 fire insurance map when the properties are developed with buildings for businesses such as auto repair, metal drum cleaning, welding, an oil warehouse, and a structure that contains fuel oil ASTs.

### **B.5.b. Historical Topographic Maps**

The USGS topographic map used for the figure in Appendix A is dated 1969 with revisions made in 1993. The Site is developed with a small building located on the western portion of the Site that was constructed prior to 1969. Various sized buildings are depicted on the adjoining and surrounding properties.

### **B.5.c. Aerial Photographs**

Copies of the aerial photographs are attached in Appendix G. The following is a summary of the information reviewed.

#### **1923 - 1958**

The Site consists of a vacant parcel. Larch Street and Farrington Avenue border the Site to the south and west, respectively. The adjoining properties are vacant except for the property to the northwest, which was developed with a residence on the 1947 aerial photograph and the southwest property that was developed with a light-industrial building on the 1953 aerial photograph.

#### **1966**

The Site consists of an outdoor storage area with what appears to be vehicles. Five large ASTs are apparent on the adjoining property northeast of the Site. What appears to be a vehicle salvage yard is apparent on the adjoining property east of the Site. The adjoining properties to the west, south, and northwest of the Site are developed with light-industrial buildings with outdoor storage areas.

#### **1974**

A rectangular-shaped building is apparent on the western portion of the Site. Due to the quality of the aerial photograph, we are unable to determine land use on the remainder of the Site however, it appears to be used for outdoor storage. The adjoining properties appear relatively similar to the 1966 aerial photograph except two buildings are apparent on the adjoining properties north of the Site.

#### **1980 - 1985**

The Site appears relatively similar to the 1974 aerial photograph except an addition has been constructed on the east side of the building at the Site. The adjoining properties appear relatively similar to the 1974 aerial photograph.

#### **1991 - 1994**

Separate buildings are located on the east and southeastern portions of the Site. The remainder of the outdoor storage area at the Site is covered with what appears to be vehicles. The adjoining properties appear relatively similar to the 1985 aerial photograph.

#### **2000 - 2012**

Additions were constructed on the west and south sides of the building located on the western portion of the Site. The adjoining properties appear relatively similar to the 1994 aerial photograph except the five ASTs located on the adjoining property northeast of the Site have been removed.

#### **B.5.d. City Directory Information**

We retained HIG to obtain city directory information pertaining to the Site and surrounding area. HIG provided city directories for Larch Street and Farrington Street at approximate five-year intervals from 1929 to 2012. The following occupants were listed as occupying the Site for the indicated years:

1929 - 1959	Not listed
1969/70 - 1989	Midwest Brass and Aluminum Foundry
1994 - 2012	EJ Liquidation (salvage)

The businesses located on the adjoining properties to the Site consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing.

### **C. Interviews**

We contacted the following individual to obtain knowledge or historical and current land-use information regarding the Site:

**Ms. Kristine Kujala, Ramsey County Property Tax, Records & Election Services,  
Tax Forfeited Land (Site representative)**

According to information received from Ms. Kujala, the Site was forfeited to the State of Minnesota for unpaid property taxes. City of Saint Paul Code Enforcement officers received complaints and performed inspections regarding possible hazardous waste dumping associated with salvaging parts from vehicles for a junk yard that operated at the Site. Ms. Kujala stated that all the buildings at the Site were demolished in 2012.

### **D. Site Reconnaissance**

The objective of the Site reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with the Site.

A Braun Intertec environmental professional, Kevin Hoffman, conducted a Site reconnaissance on April 21, 2016. We were unaccompanied during the Site reconnaissance.

At the time of the Site reconnaissance, the weather was cloudy and drizzling with a slight breeze and a temperature of about 55 degrees Fahrenheit.

### **D.1. Methodology**

Observations made at the time of the Site reconnaissance were conducted by physically traversing and visually observing the exterior aspects of the Site. Adjoining properties were visually observed from the Site boundaries or nearby public right-of-way areas.

### **D.2. Site Characteristics and Improvements**

At the time of the reconnaissance, the Site consisted of a vacant grass-covered parcel totaling approximately 0.59 acres. No improvements such as buildings or paved surfaces were observed at the Site at the time of our reconnaissance. A Site Sketch and Site Photographs are attached in Appendices B and H, respectively.

### **D.3. Adjoining Property Use and Characteristics**

The Site was bordered on the north by Northern Screw and Machine with residential properties located beyond; on the east by Just-In-Tyme Towing with light-industrial facilities located beyond; on the south by Larch Street followed by Corval Group storage yard with railroad tracks and light-industrial facilities located beyond; and on the west by Farrington Street followed by two vacant light-industrial properties with light-industrial facilities located beyond. The Site was located in a light-industrial area within the City of Saint Paul.

Active and vacant light-industrial facilities with outdoor storage were observed on the adjoining properties that are considered to be an environmental concern.

### **D.4. Pits, Ponds, Pools of Liquid, or Lagoons**

No indications of pits, ponds, pools of liquid, or lagoons having the potential to contain hazardous substances or petroleum products were observed at the Site or on adjoining properties at the time of our reconnaissance.

### **D.5. Stained Soil or Pavement**

No stained soil or pavement were observed at the Site at the time of our reconnaissance.

## **D.6. Solid Waste Disposal**

At the time of the reconnaissance, no indications of waste disposal areas, observed fill, mounds, depressions, burn pits or graded areas by non-natural causes were observed at the Site that would indicate a potential for the presence of trash, construction debris, demolition debris, or other solid waste disposal.

## **D.7. Stressed Vegetation**

No areas of stressed, discolored, stained or dead vegetation beyond what would be expected due to seasonal conditions were observed at the time of the Site reconnaissance.

## **D.8. Hazardous Substances**

No indications of current and/or historic use, storage, staining, or spills of hazardous substances were observed at the Site at the time of the reconnaissance.

## **D.9. Petroleum Products**

No indications of current and/or historic use, storage, staining, or spills of petroleum products were observed at the Site at the time of the reconnaissance.

## **D.10. Storage Tanks**

No indications of ASTs or USTs were noted at the Site at the time of the reconnaissance.

## **D.11. Unidentified Drums and Containers**

No drums containing unidentified substances suspected of being a hazardous substance or petroleum product were observed at the Site at the time of our reconnaissance.

## **D.12. Odors**

No indications of strong, pungent, or noxious odors were observed at the time of the Site reconnaissance.

### **D.13. Potential PCB-Containing Electrical and Hydraulic Equipment**

Three pole-mounted electrical transformers were noted near the northeast corner of the Site. The transformers appeared to be in good condition with no indications of leaking or staining.

### **D.14. Wastewater Discharges**

No indications of wastewater discharging into a drain, ditch, underground injection system, or stream on or adjacent to the Site were observed at the time of the reconnaissance.

### **D.15. Sewage Disposal System**

Considering the location of the Site in a developed area of Saint Paul, the Site is likely connected to municipal sewer services.

### **D.16. Wells**

No indications of wells such as monitoring wells, dry wells, irrigation wells, injection wells, abandoned wells, or other non-potable wells were observed at the Site at the time of the reconnaissance.

### **D.17. Potable Water Supply**

Considering the location of the Site in a developed area of Saint Paul, the Site is likely connected to municipal water services.

## **E. Summary of Land-Use Activities**

The Site consisted of vacant land from prior to 1929 until the mid-1960s. The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant. The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000.

At the time of the reconnaissance, the Site consisted of a vacant grass-covered parcel totaling approximately 0.59 acres. No improvements such as buildings or paved surfaces were observed at the Site at the time of our reconnaissance.

## **F. Limiting Conditions and Data Gaps**

The findings and conclusions presented in this report are based on procedures described in ASTM Practice E1527-13, inquiries with public officials, available literature cited in this report, conditions noted at the time of our Phase I ESA, and our interpretation of the information obtained as part of this Phase I ESA. Our findings and conclusions are limited to the specific project and properties described in this report and by the accuracy and completeness of information provided by others.

An environmental site assessment cannot wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property within reasonable limits of time and cost.

In performing its services, Braun Intertec used that degree of care and skill ordinarily exercised under similar circumstances by reputable members of its profession currently practicing in the same locality. No warranty, express or implied, is made.

No limiting conditions were identified during the Phase I ESA process.

No data gaps were identified during the Phase I ESA process, with the exception of the following:

- Historical resources were not readily available for 5-year-or-less intervals from the time of the first developed use.

The identified data gaps did not affect the environmental professional's ability to render opinions regarding conditions indicative of a release or threatened release.

## **G. Findings**

The findings include identified known or suspect recognized environmental conditions, controlled recognized environmental conditions, historical recognized conditions, *de minimis* conditions and additional issues in connection with the Site.

The following findings are based on the results of our assessment:

- The Site consisted of vacant land from prior to 1929 until the mid-1960s.
- The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant.
- The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000. A closed release (Leak #3504) with groundwater contamination at an adjoining property south of the Site (300 Larch Street) is listed in the regulatory report. An active VIC site (VP28030) is listed in the regulatory report at an adjoining property south of the Site (807 Farrington Street).
- At the time of the reconnaissance, the Site consisted of a vacant grass-covered parcel totaling approximately 0.59 acres. No improvements such as buildings or paved surfaces were observed at the Site at the time of our reconnaissance.

## H. Opinions

According to the User, the Phase I ESA was conducted in association with the potential sale of the Site. Opinions expressed herein are influenced by the stated reason for conducting the Phase I ESA. Furthermore, the expressed opinions might not be applicable to alternate reasons for reliance on the content of the Phase I ESA.

### H.1. Recognized Environmental Conditions

A recognized environmental condition is defined by ASTM Practice E1527-13 as: “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment, 2) under conditions indicative of a release to the environment, or 3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.”



This assessment identified no recognized environmental conditions in connection with the Site, with the exception of the following:

- The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant. Considering the past use of the Site as a foundry and a salvage yard, it is our opinion the past uses at the Site have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered recognized environmental conditions.
- The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000. A closed release (Leak #3504) with groundwater contamination at an adjoining property south of the Site (300 Larch Street) is listed in the regulatory report. An active VIC site (VP28030) is listed in the regulatory report at an adjoining property south of the Site (807 Farrington Street). It is our opinion the past uses and reported releases at the adjoining properties have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered a recognized environmental condition for the Site.

## **H.2. Controlled Recognized Environmental Conditions**

A controlled recognized environmental condition is defined by ASTM Practice E1527-13 as “a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.”

This assessment identified no controlled recognized environmental conditions in connection with the Site.

## **H.3. Historical Recognized Environmental Conditions**

A historical recognized environmental condition is defined by ASTM Practice E1527-13 as “a past release of any hazardous substances or petroleum products that has occurred in connection with the Site and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the Site to any required controls.”

This assessment identified no historical recognized environmental conditions in connection with the Site.

#### **H.4. *De Minimis* Conditions**

A *de minimis* condition is defined by ASTM Practice E1527-13 as “a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

The following findings are considered *de minimis* conditions:

- The Site consisted of vacant land from prior to 1929 until the mid-1960s. It is our opinion the past use of the Site as vacant land is considered a *de minimis* condition.
- At the time of the reconnaissance, the Site consisted of a vacant grass-covered parcel totaling approximately 0.59 acres. No improvements such as buildings or paved surfaces were observed at the Site at the time of our reconnaissance. It is our opinion the current use of the Site as vacant land is considered a *de minimis* condition.

### **I. Conclusions**

We have conducted this Phase I ESA of the Site in general conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Section F of this report.

This assessment identified no recognized environmental conditions in connection with the Site, with the exception of the following:

- The Site was developed in the mid-1960s and occupied by Midwest Brass and Aluminum Foundry until at least 1989. In the early-1990s, the Site was occupied by EJ Liquidation as a salvage yard until 2012 when the buildings were demolished and the Site became vacant. Considering the past use of the Site as a foundry and a salvage yard, it is our opinion the past uses at the Site have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered recognized environmental conditions.
- The businesses located on the adjoining properties to the Site beginning in the mid-1950s consisted of concrete/cement, excavating, and mechanical contractors, auto salvage and vehicle repair, barrel and drum reconditioning, and truck warehousing including five large

ASTs on the adjoining property northeast of the Site from the mid-1960s until between 1994 and 2000. A closed release (Leak #3504) with groundwater contamination at an adjoining property south of the Site (300 Larch Street) is listed in the regulatory report. An active VIC site (VP28030) is listed in the regulatory report at an adjoining property south of the Site (807 Farrington Street). It is our opinion the past uses and reported releases at the adjoining properties have the potential to impact the soil, groundwater, and/or soil vapor at the Site and are considered a recognized environmental condition for the Site.

This assessment identified no controlled recognized environmental conditions in connection with the Site.

## **J. References**

References are listed in Appendix I.

## **K. Environmental Professional Statement and Qualifications**

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. We have developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Qualifications of the environmental professional and the qualifications of the personnel conducting the site reconnaissance and interviews, if conducted by someone other than an environmental professional, are attached in Appendix J.

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.

BRAUN INTERTEC CORPORATION

Kevin J. Hoffman  
Senior Scientist

Mark A. Ciampone, PG  
Associate Principal – Senior Scientist

**Appendix A**  
**Site Location Map**

**Appendix B**  
**Site Sketch**

**Appendix C**  
**Ramsey County Property Information**

**Appendix D**  
**Environmental Data Resources, Inc. Report**

## **Appendix E**

### **City of Saint Paul Property Records**



**Appendix F**  
**Fire Insurance Maps**

**Appendix G**  
**Aerial Photographs**

**Appendix H**  
**Site Photographs**

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## **Appendix I**

### **References**

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**Appendix J**  
**Resumes**