



Minnesota Pollution Control Agency

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July 12, 2016

Ms. Heather Worthington
Deputy County Manager, Ramsey County
Economic Growth and Community Investment
15 W. Kellogg Blvd.
Saint Paul, MN 55102

RE: TCAAP Redevelopment Site, 4700 Highway 10, Arden Hills
MPCA Project Number VP22891
Certificate of Completion

Dear Ms. Worthington:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup Program is pleased to send the enclosed Commissioner's Certificate of Completion of Response Actions Under the Land Recycling Act of 1992, As Amended (Certificate of Completion).

Thank you for the time and resources that Ramsey County has devoted to making the western portion of TCAAP suitable for redevelopment. The MPCA staff appreciates and commends the good work of the many project partners who helped make the project a success.

If you have any questions about the enclosed Certificate of Completion, please contact me at 651-757-2402 or by email at amy.hadiaris@state.mn.us or Shanna Schmitt at 651-757-2697 or by email at shanna.schmitt@state.mn.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sandeep R. Burman".

Sandeep R. Burman, PG, Manager
Site Remediation & Redevelopment Section
Remediation Division

AH:bhj

Enclosure

cc: Beth Engum, Ramsey County Public Works
Joe Otte, Wenck
Mark Ryan, Carl Bolander & Sons
Rick Kubler, Gray Plant Mooty
Rick Van Allen, Bay West
Mike Fix, U.S. Army
Tom Barounis, EPA Region 5
Sue Iverson, Acting City Administrator, Arden Hills
Larry Carlson, Ramsey County Environmental Health
Lyle Salmela, TCAAP Restoration Advisory Board

**STATE OF MINNESOTA
POLLUTION CONTROL AGENCY**

**Commissioner's Certificate
of Completion of Response Actions
Under the Land Recycling Act of 1992, As Amended**

Whereas, Ramsey County has undertaken soil response actions pursuant to Minn. Stat. § 115B.175 (the Land Recycling Act of 1992, as amended) at the TCAAP Redevelopment #2 site, VP22891, located at 4700 Highway 10, in Arden Hills, and further described in a legal description in Exhibit A to this CERTIFICATE (the Site) and shown on the map in Exhibit D to this CERTIFICATE; and

Whereas, Ramsey County submitted a Voluntary Response Action Plan (comprised of the documents and reports listed as nos. 1 through 55 in Exhibit B of this CERTIFICATE) including an Investigation Report (comprised of the documents and reports listed as nos. 1 through 18 in Exhibit B of this CERTIFICATE), to the Minnesota Pollution Control Agency (MPCA) under Minn. Stat. § 115B.17, subd. 14, governing review of voluntary investigation and response actions; and

Whereas, in accordance with Minn. Stat. §§ 115B.17 subd. 14, and 115B.175, the Commissioner of the MPCA (Commissioner) or the Commissioner's delegate has determined that the Investigation Report adequately identified and evaluated the nature and extent of the releases and threatened releases to soil at the Site; and

Whereas, the Commissioner or the Commissioner's delegate has approved a Voluntary Response Action Plan (comprised of documents 1 through 55 in Exhibit B of this CERTIFICATE) including the soil response actions determined by the Commissioner or the Commissioner's delegate to be necessary to protect public health and welfare, and the environment, from releases or threatened releases of hazardous substances, pollutants, or contaminants to soil at the Site, as described in Exhibit C of this CERTIFICATE; and

Whereas, the United States Army has evaluated the nature and extent of releases and threatened releases to groundwater at the Site, as documented in the MPCA's Superfund administrative record, and retains responsibility for additional groundwater investigation at the Site, as needed; and

Whereas, the United States Army is conducting groundwater response actions at the Site, in accordance with the Record of Decision (ROD) for Operable Unit 2 (OU2), along with various OU2 ROD amendments and other documents in the Superfund administrative record, and retains responsibility for future groundwater response actions at the Site, in accordance with these documents; and

Whereas, based upon information contained in the affidavit of Heather Worthington, Deputy County Manager of Ramsey County, dated January 28, 2016, the MPCA Commissioner or Commissioner's delegate has determined that Ramsey County is qualified to obtain protection from liability provided by the Land Recycling Act of 1992, as amended, as a person not otherwise responsible for the release or threatened release of hazardous substances, pollutants, or contaminants at the Site under Minn. Stat. §§ 115B.01 to 115B.18; and

Whereas, Ramsey County has completed the soil response actions set forth in the approved Voluntary Response Action Plan, including the actions necessary to remove the existing land use controls at the Site and carry out any reuse or development of the Site, including but not limited to residential development, in a manner that protects public health and welfare and the environment.

Now, Therefore, pursuant to Minn. Stat. § 115B.175, subd. 5,

The COMMISSIONER OF THE MINNESOTA POLLUTION CONTROL AGENCY CERTIFIES UNDER MINN. STAT. § 115B.175 (THE LAND RECYCLING ACT OF 1992, AS AMENDED), THAT SOIL RESPONSE ACTIONS HAVE BEEN COMPLETED AS SET FORTH IN THE APPROVED VOLUNTARY RESPONSE ACTION PLAN FOR THE SITE.

Upon issuance of this CERTIFICATE, the persons qualified for protection under Minn. Stat. § 115B.175, subd. 6, are entitled to protection from liability under Minn. Stat. §§ 115B.01 to 115B.18, to the extent provided in the Land Recycling Act of 1992, as amended. The protection from liability provided under Minn. Stat. § 115B.175, does not apply to any person excluded from that protection under Minn. Stat § 115B.175, subd. 7.

This CERTIFICATE and the protection from liability under the Land Recycling Act of 1992, as amended, referred to in this CERTIFICATE apply to releases and threatened releases to soil at the Site which were not required to be removed or remediated, and to releases and threatened releases to groundwater at the Site which are being remediated by the U.S. Army, in accordance with the OU2 ROD and other applicable documents for the New Brighton/Arden Hills Superfund site, conditioned and upon compliance by Ramsey County and subsequent owners of the Site, and their successors and assigns, with the Environmental Covenant and Easement (Environmental Covenant) as approved and executed by the MPCA and Ramsey County. The Environmental Covenant was recorded on April 16, 2013 with the Ramsey County Registrar of Titles (Document #2207138) and with the Ramsey County Recorder (Document #4396482). An Amended Environmental Covenant lifting the existing land use controls, but retaining existing groundwater restrictions, will be filed shortly after issuance of this CERTIFICATE.

Nothing in this CERTIFICATE or in the Land Recycling Act of 1992, as amended, affects the authority of the MPCA or the MPCA Commissioner to exercise any powers or duties under Minn. Stat §§ 115B.01 to 115B.18, or other law with respect to any release or threatened release at the Site, or the right of the MPCA or the MPCA Commissioner to seek any relief available under those sections against any person who is not entitled to protection from liability under the Land Recycling Act of 1992, as amended, with respect to such release or threatened release.

SIGNED AND CERTIFIED this 12 day of July, 2016



Sandeep R. Burman, Delegate of the Commissioner
Manager
Remediation Division
Minnesota Pollution Control Agency

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

The foregoing was acknowledged before me this 12th day of July, 2016, by Sandeep R. Burman, pursuant to delegation by John Linc Stine, Commissioner of the Minnesota Pollution Control Agency, a state agency, on behalf of the State of Minnesota.



Elizabeth O'Hara
Notary Public

My Commission Expires January 2020

**EXHIBIT A
LEGAL DESCRIPTION**

**TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891**

LEGAL DESCRIPTION OF 380-ACRE PARCEL
(A.K.A "CALIFORNIA-SHAPED" PARCEL)

That part of BROOK LAND ACRES, Ramsey Co., Minn., and that part of the South Half of Section 9, Township 30 North, Range 23 West, Ramsey County, Minnesota, lying southerly of the North 49.5 feet of the Southwest Quarter of said Section 9, now known as a portion of Town Road "H2", vacated, as dedicated on the plat of BROOK LAND ACRES, Ramsey County, Minnesota, and that part of Section 16, said Township 30 North, Range 23 West, EXCEPT the southerly 133.00 feet of said Section 16, all lying easterly of the following described line:

Commencing at the west quarter corner of said Section 9; thence easterly on an azimuth of 90 degrees 01 minute 58 seconds along the east and west quarter line thereof and the boundary of Minnesota Department of Transportation Right of Way Plat No. 62-44, as the same is on file and of record in the office of the County Recorder in and for said County, for 182.41 feet to Right of Way Boundary Corner B4406 and the point of beginning of the line to be described; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said plat for 1,176.34 feet to Right of Way Boundary Corner B1; thence on an azimuth of 160 degrees 23 minutes 53 seconds along the boundary of said plat for 771.62 feet to Right of Way Boundary Corner B2; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said plat for 140.00 feet to Right of Way Boundary Corner B3; thence on an azimuth of 218 degrees 11 minutes 13 seconds along the boundary of said plat for 398.25 feet to Right of Way Boundary Corner B4; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said plat for 287.49 feet to Right of Way Boundary Corner B4405 as shown on said Plat No. 62-44 also being Right of Way Boundary Corner B4405 as shown on Minnesota Department of Transportation Right of Way Plat No. 62-43 as the same is on file and of record in the office of the County Recorder in and for said County; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said Plat No. 62-43 for 18.24 feet to Right of Way Boundary Corner B1; thence on an azimuth of 166 degrees 27 minutes 32 seconds along the boundary of said plat for 1,951.24 feet to Right of Way Boundary Corner B2; thence on an azimuth of 144 degrees 50 minutes 10 seconds along the boundary of said plat for 774.66 feet to Right of Way Boundary Corner B3; thence southeasterly for 113.63 feet along the boundary of said plat on a circular curve, concave to the northeast, having a radius of 5,579.58 feet, a delta angle of 01 degree 10 minutes 01 second, and a chord azimuth of 144 degrees 15 minutes 10 seconds, to Right of Way Boundary Corner B4; thence southeasterly for 275.90 feet along the boundary of said plat on a compound curve, concave to the northeast, having a radius of 5,579.58 feet, a delta angle of 02 degrees 49 minutes 59 seconds, and a chord azimuth of 142 degrees 15 minutes 10 seconds, to Right of Way Boundary Corner B5; thence on an azimuth of 140 degrees 50 minutes 10 seconds along the boundary of said plat for 51.18 feet to Right of Way Boundary Corner B4306 as shown on said Plat No. 62-43 also being Right of Way Boundary Corner B4306 as shown on Minnesota Department of Transportation Right of Way Plat No. 62-42 as the same is on file and of record in the office of the County Recorder in and for said County; thence continue on an azimuth of 140 degrees 50 minutes 10 seconds along the boundary of said Plat No.

LEGAL DESCRIPTION CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

62-42 for 1,579.05 feet, more or less, to a point on said boundary line distant 1,310.00 feet northwesterly of Right of Way Boundary Corner B2 as shown on said Plat No. 62-42; thence leaving said boundary line on an azimuth of 135 degrees 16 minutes 13 seconds for a distance of 567.07 feet, more or less, to a point on a line lying 55 feet northeasterly of, as measured at right angles to, and parallel with said boundary line; thence on an azimuth of 140 degrees 50 minutes 10 seconds, along said parallel line, for a distance of 347.74 feet; thence leaving said parallel line on an azimuth of 124 degrees 28 minutes 44 seconds for a distance of 312.47 feet, more or less, to a point on a line lying 143 feet northeasterly of, as measured at right angles to, and parallel with said boundary line; thence on an azimuth of 140 degrees 50 minutes 10 seconds, along said parallel line, for a distance of 154.84 feet, more or less, to a point 45 feet northerly of, as measured at right angles to, the boundary line of said Plat No. 62-42 lying between Right of Way Boundary Corners B2 and B3 as shown on said Plat No. 62-42; thence on an azimuth of 90 degrees 13 minutes 30 seconds for a distance of 1,192.96 feet, more or less, to a point on a line run northerly and perpendicular from the easterly extension of said boundary line from a point on said extended line distant 1,340.00 feet easterly of said Right of Way Boundary Corner B2 and said point on said perpendicular line being 30.00 feet northerly of said extended boundary line; thence on an azimuth of 179 degrees 30 minutes 16 seconds, along said perpendicular line, for a distance of 30.00 feet, more or less, to the northerly line of said southerly 133.00 feet of said Section 16, and said line there terminating.

And lying westerly of the following described line:

Commencing at the north quarter corner of said Section 9; thence North 89 degrees 52 minutes 51 seconds West, along the north line of the Northwest Quarter of said Section 9, a distance of 50.00 feet; thence South 00 degrees 43 minutes 50 seconds East, along a line parallel with the east line of said Northwest Quarter, a distance of 550.00 feet; thence North 89 degrees 52 minutes 51 seconds West, along a line parallel with said north line of the Northwest Quarter, a distance of 1,425.22 feet to the point of beginning of the line to be described; thence South 00 degrees 33 minutes 53 seconds East, along a line parallel with the west line of said Northwest Quarter, a distance of 2,206.32 feet; thence South 18 degrees 39 minutes 57 seconds West a distance of 1,896.72 feet to a point hereinafter referred to as **"Angle Point P13"**; thence South 82 degrees 05 minutes 01 second East a distance of 242.81 feet to a point hereinafter referred to as **"Angle Point P12"**; thence North 72 degrees 44 minutes 31 seconds East a distance of 363.88 feet; thence North 26 degrees 57 minutes 40 seconds East a distance of 227.73 feet; thence North 46 degrees 51 minutes 46 seconds East a distance of 398.07 feet; thence North 53 degrees 46 minutes 21 seconds East a distance of 232.79 feet; thence South 83 degrees 27 minutes 05 seconds East a distance of 1,744.23 feet; thence South 25 degrees 05 minutes 46 seconds West a distance of 465.00 feet; thence South 05 degrees 24 minutes 36 seconds West a distance of 515.00 feet; thence North 89 degrees 48 minutes 32 seconds West a distance of 131.10 feet; thence South 01 degree 30 minutes 22 seconds East a distance of 1,737.59 feet; thence South 24 degrees 24 minutes 27 seconds East a distance of 754.68 feet; thence South 42 degrees 48 minutes 32 seconds East a distance of 2,248.42 feet; thence South 00 degrees 02 minutes 56 seconds West a distance of 1,466.80 feet, more or less, to the south line of the Southeast Quarter of said Section 16 and said line there terminating.

And lying southerly of the following described line:

LEGAL DESCRIPTION CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

Commencing at the west quarter corner of said Section 9; thence easterly on an azimuth of 90 degrees 01 minute 58 seconds along the east and west quarter line thereof and the boundary of Minnesota Department of Transportation Right of Way Plat No. 62-44, as the same is on file and of record in the office of the County Recorder in and for said County, for 182.41 feet to Right of Way Boundary Corner B4406; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said plat for 1,176.34 feet to Right of Way Boundary Corner B1; thence on an azimuth of 160 degrees 23 minutes 53 seconds along the boundary of said plat for 771.62 feet to Right of Way Boundary Corner B2 and the point of beginning of the line to be described; thence leaving said boundary line on a bearing of South 83 degrees 47 minutes 26 seconds East (azimuth of 96 degrees 12 minutes 34 seconds) a distance of 100.58 feet to hereinbefore described **"Angle Point P13"**; thence South 82 degrees 05 minutes 01 second East a distance of 242.81 feet to hereinbefore described **"Angle Point P12"**, and said described line there terminating.

LEGAL DESCRIPTION OF 47-ACRE PARCEL
(A.K.A "NORTH THUMB")

That part of the Southwest Quarter of the Northwest Quarter of Section 9, Township 30, Range 23, lying southerly of the following described line:

Commencing at a point on the north line of said Northwest Quarter of Section 9 distant fifty (50) feet Westerly of the Northeast corner of said Northwest Quarter; thence Southerly along a line parallel with the East line of said Northwest Quarter a distance of 550.00 feet; thence Westerly along a line parallel with the North line of said Northwest Quarter a distance of 1,425.22 feet to the point of beginning of the line to be described; thence Southerly along a line parallel with the West line of said Northwest Quarter a distance of 1,235.00 feet; thence Westerly along a line parallel with the North line of said Northwest Quarter a distance of 1,160.0 feet, more or less, to said West line of the Northwest Quarter, and said described line there terminating.

And lying Westerly of the following described line:

Commencing at the North Quarter corner of said Section 9; thence North 89 degrees 52 minutes 51 seconds West, assumed bearing, along the North line of said Northwest Quarter a distance of 50.00 feet; thence South 00 degrees 43 minutes 50 seconds East along a line parallel with the East line of said Northwest Quarter a distance of 550.00 feet; thence North 89 degrees 52 minutes 51 seconds West along a line parallel with the North line of said Northwest Quarter a distance of 1,425.22 feet to the point of beginning of the line to be described; thence South 00 degrees 33 minutes 53 seconds East along a line parallel with the West line of said Northwest Quarter a distance of 2,206.32 feet and said described line there terminating.

And lying Easterly of the following described line:

Commencing at the West Quarter corner of said Section 9; thence Easterly on an azimuth of 90 degrees 01 minute 58 seconds along the East and West Quarter line thereof and the boundaries of

LEGAL DESCRIPTION CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

Minnesota Department of Transportation Right of Way Plats No. 62-44 and 62-45, as the same are on file and of record in the office of the Registrar of Titles in and for Ramsey County, Minnesota, for 182.41 feet to Right of Way Boundary Corner B4406; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said Right of Way Plat No. 62-44 for 1176.34 feet to Right of Way Boundary Corner B 1 and the point of beginning of the line to be described; thence on an azimuth of 359 degrees 18 minutes 09 seconds along the boundary of said plat for 1176.34 feet to said Right of Way Boundary Corner B4406; thence continuing on said azimuth of 359 degrees 18 minutes 09 seconds along the boundary of said Right of Way Plat No. 62-45, for 5.78 feet to Right of Way Boundary Corner B7; thence on an azimuth of 359 degrees 25 minutes 22 seconds along the boundary of said plat for 850.31 feet to Right of Way Boundary Corner B6; thence continuing on said azimuth of 359 degrees 25 minutes 22 seconds, along the Northerly extension of the last described boundary line, for 100.00 feet and said described line there terminating.

(Torrens Property)

Together with

That part of the North 49.5 feet of the Southwest Quarter of Section 9, Township 30, Range 23, now known as a portion of Town Road "H2", vacated, as dedicated on the plat of BROOK LAND ACRES, Ramsey County, Minnesota, lying westerly of the following described line:

Commencing at the North Quarter corner of said Section 9; thence North 89 degrees 52 minutes 51 seconds West, assumed bearing, along the north line of said Northwest Quarter a distance of 50.00 feet; thence South 00 degrees 43 minutes 50 seconds East along a line parallel with the east line of said Northwest Quarter a distance of 550.00 feet; thence North 89 degrees 52 minutes 51 seconds West along a line parallel with the north line of said Northwest Quarter a distance of 1,425.22 feet to the point of beginning of the line to be described; thence South 00 degrees 33 minutes 53 seconds East along a line parallel with the west line of said Northwest Quarter a distance of 2,206.32 feet and said described line there terminating.

And lying easterly of the following described line:

Commencing at the west quarter corner of said Section 9; thence easterly on an azimuth of 90 degrees 01 minute 58 seconds along the east and west quarter line thereof and the boundaries of Minnesota Department of Transportation Right of Way Plats No. 62-44 and 62-45, as the same are on file and of record in the office of the Registrar of Titles in and for Ramsey County, Minnesota, for 182.41 feet to Right of Way Boundary Corner B4406; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said Right of Way Plat No. 62-44 for 1176.34 feet to Right of Way Boundary Corner B 1 and the point of beginning of the line to be described; thence on an azimuth of 359 degrees 18 minutes 09 seconds along the boundary of said plat for 1176.34 feet to said Right of Way Boundary Corner B4406; thence continuing on said azimuth of 359 degrees 18 minutes 09 seconds along the boundary of said Right of Way Plat No. 62-45, for 5.78 feet to Right of Way Boundary Corner B7; thence on an azimuth of 359 degrees 25 minutes 22 seconds along the boundary of said plat for 850.31 feet to Right of Way Boundary Corner B6; thence continuing on

LEGAL DESCRIPTION CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

said azimuth of 359 degrees 25 minutes 22 seconds, along the northerly extension of the last described boundary line, for 100.00 feet and said described line there terminating.

(Torrens Property)

Together with

That part of BROOK LAND ACRES, Ramsey Co., Minn., and that part of the South Half of Section 9, Township 30 North, Range 23 West, Ramsey County, Minnesota, lying southerly of the North 49.5 feet of the Southwest Quarter of said Section 9, now known as a portion of Town Road "H2", vacated, as dedicated on the plat of BROOK LAND ACRES, Ramsey County, Minnesota, all lying westerly of the following described line:

Commencing at the north quarter corner of said Section 9; thence North 89 degrees 52 minutes 51 seconds West, along the north line of the Northwest Quarter of said Section 9, a distance of 50.00 feet; thence South 00 degrees 43 minutes 50 seconds East, along a line parallel with the east line of said Northwest Quarter, a distance of 550.00 feet; thence North 89 degrees 52 minutes 51 seconds West, along a line parallel with said north line of the Northwest Quarter, a distance of 1,425.22 feet to a point hereinafter referred to as "**Angle Point P15**"; thence South 00 degrees 33 minutes 53 seconds East, along a line parallel with the west line of said Northwest Quarter, a distance of 2,206.32 feet to a point hereinafter referred to as "**Angle Point P14**"; thence South 18 degrees 39 minutes 57 seconds West a distance of 1,896.72 feet to a point hereinafter referred to as "**Angle Point P13**"; thence South 82 degrees 05 minutes 01 second East a distance of 242.81 feet to a point hereinafter referred to as "**Angle Point P12**"; thence North 82 degrees 05 minutes 01 second West, along the last described course, a distance of 212.76 feet, more or less, to a point distant 30.05 feet easterly of hereinbefore described "**Angle Point P13**", and the point of beginning of the line to be described; thence northerly a distance of 16.95 feet along a non-tangential curve concave to the east having a radius of 51.00 feet, a central angle of 19 degrees 02 minutes 20 seconds and a chord bearing North 00 degrees 41 minutes 58 seconds East a distance of 16.87 feet; thence North 10 degrees 13 minutes 08 seconds East, tangent to last curve, a distance of 55.68 feet; thence northerly 69.59 feet along a tangential curve concave to the west having a radius of 400.00 feet and a central angle of 09 degrees 58 minutes 04 seconds, more or less, to the intersection of the line between the previously described points "**Angle Point P13**" and "**Angle Point P14**"; thence North 18 degrees 39 minutes 57 seconds East along said intersected line a distance of 1,752.40 feet, more or less, to said "**Angle Point P14**"; thence North 00 degrees 33 minutes 53 seconds West a distance of 2,206.32 feet to previously described "**Angle Point P15**", and said described line there terminating.

And lying easterly and northerly of the following described line:

Commencing at the west quarter corner of said Section 9; thence easterly on an azimuth of 90 degrees 01 minute 58 seconds along the east and west quarter line thereof and the boundary of Minnesota Department of Transportation Right of Way Plat No. 62-44, as the same is on file and of

LEGAL DESCRIPTION CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

record in the office of the County Recorder in and for said County, for 182.41 feet to Right of Way Boundary Corner B4406 and the point of beginning of the line to be described; thence on an azimuth of 179 degrees 18 minutes 09 seconds along the boundary of said plat for 1,176.34 feet to Right of Way Boundary Corner B1; thence on an azimuth of 160 degrees 23 minutes 53 seconds along the boundary of said plat for 771.62 feet to Right of Way Boundary Corner B2; thence leaving said boundary line on a bearing of South 83 degrees 47 minutes 26 seconds East (azimuth of 96 degrees 12 minutes 34 seconds) a distance of 100.58 feet to hereinbefore described **"Angle Point P13"**; thence South 82 degrees 05 minutes 01 second East a distance of 242.81 feet to hereinbefore described **"Angle Point P12"**, and said described line there terminating.

(Abstract Property)

**EXHIBIT B
SITE DOCUMENTS**

**TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891**

Investigation Reports

1. *Phase I Environmental Site Assessment, 427 Acres of the New Brighton/Arden Hills Superfund Site, (Former Twin Cities Army Ammunition Plant), February 2013, Wenck Associates, Inc. (Wenck)*
2. *UFP-Quality Assurance Project Plan, TCAAP Redevelopment #2 Site, October 15, 2013, Wenck*
3. *Additional Investigation Work Plan, Building 101, April 4, 2014, Wenck*
4. *Additional Investigation Work Plan Building 501, April 25, 2014, Wenck*
5. *QAPP Addendum #1, UFP-Quality Assurance Project Plan, June 10, 2014, Wenck*
6. *Technical Memorandum, Drain Sampling - Building 103 (Site K), September 11, 2014, Wenck*
7. *Additional Investigation Work Plan, Site I-Building 502, October 1, 2014, Wenck*
8. *Investigation Report, Building 101, January 2015, Wenck*
9. *Building 502 Bulk Concrete Sampling Protocol, January 16, 2015, Wenck*
10. *Supplemental Remedial Investigation Report, Site I, Building 502, March 2015, Wenck*
11. *Sampling Protocol for Stockpile Footprints, Building 502, March 24, 2015, Wenck*
12. *Supplemental Investigation Report, Building 501, April 1, 2015, Wenck*
13. *QAPP Addendum #2, UFP-Quality Assurance Project Plan, April 20, 2015, Wenck*
14. *Technical Memorandum, Discrete PAH Sampling Event – Section 1010, June 1, 2015, Wenck*
15. *Technical Memorandum, ISM Status/Test Pit Results – Section 1010, September 10, 2015, Wenck*
16. *Technical Memorandum, 1,4-Dioxane Soil Results, October 28, 2015, Wenck*
17. *Soil Gas Data Package, November 21, 2013, Wenck*
18. *Response to Comments Regarding Soil Gas Data Package, June 9, 2015, Wenck*

Voluntary Response Action Plan and Response Action Implementation Reports

19. *Construction Contingency Plan, Former Twin Cities Army Ammunition Plant, May 2, 2013, Wenck*
20. *Response Action Plan/Development Response Action Plan ("Hot-Spot RAP"), October 2013, Wenck*
21. *Response Action Plan, Building 102, February 26, 2014, Wenck*
22. *Response Action Plan IRP Site K, April 24, 2014, Wenck*
23. *Response Action Plan, High Bay Area and Hot Spots, Site I, Building 502 ("PCB RAP"), July 22, 2014, Wenck*
24. *Response Action Plan Amendment (IRP Site K and Building 102), July 23, 2014, Wenck*
25. *Minor Addendum to High Bay Area and Hot Spots RAP, Building 502 (Site I), October 7, 2014, Wenck*
26. *Response Action Plan/Development Response Action Plan, Building 501, January 22, 2015, Wenck*
27. *Response Action Plan/Development Response Action Plan, Building 101, February 19, 2015, Wenck*
28. *Response Action Plan, Site I, Building 502 ("VOC RAP"), April 2015, Wenck*
29. *Final Documentation Report, Section 1001, May 2016, Wenck*
30. *Final Documentation Report, Section 1002, February 2016, Wenck*
31. *Final Documentation Report, Section 1003, April 2016, Wenck*
32. *Final Documentation Report, Section 1004, February 2016, Wenck*
33. *Final Documentation Report, Section 1005, February 2016, Wenck*
34. *Final Documentation Report, Section 1006, February 2016, Wenck*
35. *Final Documentation Report, Section 1007, February 2016, Wenck*
36. *Final Documentation Report, Section 1008, February 2016, Wenck*
37. *Final Documentation Report, Section 1009, February 2016, Wenck*
38. *Final Documentation Report, Section 1010, May 2016, Wenck*
39. *Final Documentation Report, Section 1011, February 2016, Wenck*

SITE DOCUMENTS CONTINUED
TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

40. *Final Documentation Report, Section 1012*, February 2016, Wenck
41. *Final Documentation Report, Section 1013*, June 2016, Wenck
42. *Final Documentation Report, Section 1014*, April 2016, Wenck
43. *Final Documentation Report, Section 1015*, April 2016, Wenck
44. *Final Documentation Report, Section 1016*, May 2016, Wenck
45. *Final Documentation Report, Section 1017*, April 2016, Wenck
46. *Final Documentation Report, Section 3001*, February 2016, Wenck
47. *Final Documentation Report, Section 3002*, April 2016, Wenck
48. *Final Documentation Report, Section 4001*, April 2016, Wenck
49. *Final Documentation Report, Section 4002 & 4003*, April 2016, Wenck
50. *Final Documentation Report, Section 4004 & 4005*, May 2016, Wenck
51. *Final Documentation Report, Section 4006*, May 2016, Wenck
52. *Final Documentation Report, Section 4007*, June 2016, Wenck
53. *Final Documentation Report, Section 4008*, June 2016, Wenck
54. *Final Documentation Report, Section 4009*, May 2016, Wenck
55. *Final Documentation Report, Compendium*, July 2016, Wenck

**EXHIBIT C
SITE SUMMARY**

**TCAAP REDEVELOPMENT #2 SITE
MPCA VIC PROJECT NUMBER VP22891**

The TCAAP Redevelopment #2 site encompasses approximately 427 acres in the western portion of the former Twin Cities Army Ammunition Plant (TCAAP) facility, as shown on the map in Exhibit D (the Site).

History of TCAAP

The TCAAP facility was used for the production, storage, and testing of small arms ammunition at various intervals from the 1940s to the mid-1990s. Many of the production and support buildings were located on the redevelopment parcel, as can be seen on the map in Exhibit D, while certain areas in the eastern and northern portions of the larger TCAAP facility were used for weapons testing and waste disposal. In response to the discovery of off-site groundwater contamination originating from TCAAP, the facility was placed on the National Priority List in 1983 as the New Brighton/Arden Hills Superfund Site.

U.S. Army's Activities at the Site

A 1987 Federal Facilities Agreement and a 1997 Record of Decision (ROD) for Operable Unit 2 (OU2), along with various OU2 ROD Amendments and other documents in the Superfund administrative record, lay out the U.S. Army's obligations with respect to environmental contamination at the Site. These enforcement documents, as well as the many investigation reports, cleanup plans, and closure reports generated by the U.S. Army under the oversight of the federal and state Superfund programs, can be found in the U.S. Environmental Protection Agency's (EPA) file for the New Brighton/Arden Hills Superfund Site (EPA ID Number MN7213820908) or the Minnesota Pollution Control Agency's (MPCA) file for the TCAAP Superfund Site (MPCA ID Number SR313).

Groundwater impacts at the Site include chlorinated solvents and 1,4-dioxane in deep groundwater, and chlorinated solvents in shallow perched groundwater. To treat chlorinated solvents in deep groundwater, the U.S. Army operates the TCAAP Groundwater Recovery System (TGRS) at the Site - a series of extraction wells that pump contaminated groundwater to an on-site air stripping treatment building. Remedial measures for 1,4-dioxane impacts to deep groundwater are under consideration, and the U.S. Army will modify the TGRS in the future as needed to allow for implementation of a 1,4-dioxane groundwater remedy. Chlorinated solvents in three shallow plumes at the Site are being remediated via a collection trench and air stripping tower (Site K) or monitored natural attenuation (Building 102 and Site I). The U.S. Army retains responsibility for the ongoing groundwater monitoring activities at the Site and continued operation of groundwater treatment systems, in accordance with plans approved by the EPA and MPCA.

All soil cleanup activities conducted by the U.S. Army at the Site and the larger TCAAP facility were based on an exposure scenario for a site-specific industrial use, and land use controls were established accordingly. In 2002, the federal government declared a portion of the TCAAP facility, including but not limited to the Site, to be excess land no longer needed by the Department of Defense. Additional soil investigation and cleanup by the new owner was necessary prior to lifting land use controls at the Site to allow for redevelopment.

Ramsey County's Activities at the Site

Ramsey County acquired most of the Site (397 acres) on April 15, 2013 and leased the remainder of the Site (30 acres) until certain environmental investigation and cleanup criteria were met. Ramsey County will acquire the leased acreage shortly after this Certificate of Completion is issued. Upon ownership of the full 427 acres, Ramsey County will file an Amended Environmental Covenant which removes land use controls at the Site but retains the existing groundwater restrictions.

Hazardous material abatement and demolition

Environmental oversight during removal of building slabs, pavements, buried utilities, and other subsurface features was provided by Wenck Associates on behalf of Carl Bolander & Sons Co., with additional support from Bay West LLC, on behalf of Ramsey County.

- All structures were inspected for the presence of hazardous building materials (asbestos-containing materials, lead-based paint, mercury switches, etc.) and abated as needed prior to demolition.
- Approximately 30 buildings were demolished, in addition to several slabs and buried foundations of former buildings.
- Approximately 9.4 miles of storm sewer were removed
- Approximately 9.8 miles of sanitary sewer were removed
- Approximately 13.5 miles of water service line were removed
- Approximately 7 miles of natural gas line were removed
- Approximately 1.7 miles of asbestos-wrapped steam line were removed
- Approximately 7 miles of railroad track and subgrade material were removed
- Approximately 7.4 miles of chain-link fencing were removed.
- Three electrical power substations were removed.

Recycling and Reuse

- Over 400,000 tons of concrete and pavements were processed into recycled aggregate for on- and off-site reuse.
- Wooden timbers from buildings were salvaged for off-site reuse
- Steel, rebar, and other metal was recycled
- Railroad ties in good condition were collected for off-site reuse
- Railroad track was salvaged for off-site reuse

Soil Investigation

To supplement soil data previously collected at the Site by the U.S. Army and others, Ramsey County conducted the following additional soil investigation activities:

- Collected soil samples at selected floor penetrations (sumps, pits, floor drains) from within the footprint of buildings in which manufacturing activities had taken place (Buildings 101, 102, 103, 104, 111, 112, 114, 115, 151, 157, 501, 502, 503, 557, and 587). Floor penetration samples were analyzed for volatile organic compounds (VOCs).
- Excavated test pits within the footprint of Buildings 101 and 501 for more comprehensive coverage. Selected soil samples were analyzed for polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), varied metals, cyanide, and diesel range organics (DRO).
- Advanced soil borings within the footprint of Building 502 to better define the extent and magnitude of contamination in the vicinity of a former degreaser and a former solvent storage tank. Selected soil samples were analyzed for VOCs and 1,4-dioxane.
- After removal of railroad tracks, ballast, and six inches of subgrade material, selected soil samples were analyzed for PAHs, pesticides, Resource Conservation and Recovery Act (RCRA) metals, and DRO. Typically, composite samples were collected from the stockpile of removed subgrade material. If the stockpile sample had contaminant concentrations above actionable levels, additional soil was removed from the rail bed, followed by discrete soil confirmation samples that were analyzed only for the contaminant(s) that had exceeded the cleanup goal. In other cases only discrete confirmation samples were collected from the former rail bed after removal of six inches of subgrade material; these discrete samples were analyzed for the full suite of parameters listed above.

- After removal of all structures and excavation of all known areas of soil contamination at the Site, Incremental Sampling Methodology (ISM) was used as a final check to evaluate the concentration of PAHs and metals in shallow soil across the Site. Approximately 2,400 shallow soil borings were advanced across the Site in a grid pattern during the ISM investigation. The ISM sampling results indicate that the average concentration of PAHs and metals (antimony, arsenic, barium, cadmium, chromium, copper, lead, manganese, mercury and thallium) in the upper four feet of soil across the Site are less than the MPCA's residential soil reference values (SRVs).

Soil Response Actions and Cleanup Goals

Seven MPCA-approved response action plans (RAPs) were implemented at the Site. Collectively, the RAPs addressed soil impacts ranging from isolated, minor exceedances of a cleanup goal, to large areas impacted by chlorinated solvents and high concentrations of PCBs. The cleanup goal for chlorinated solvents was the MPCA's soil leaching values (SLVs). The cleanup goal for PAHs, PCBs, cyanide, and most metals was the MPCA's residential SRVs. Site-specific cleanup goals were established for two metals – iron and vanadium – based on their respective residential SRV being less than site background soil concentrations.

Petroleum-impacted soil at the Site is under the oversight of the MPCA's Petroleum Brownfields Program, and is not covered by this Certificate of Completion. Soil response actions for petroleum-impacted soil at the Site were based on a chosen DRO cleanup goal of 100 milligrams per kilogram (mg/kg).

Impacted soil was excavated and hauled to a permitted landfill for disposal, as summarized below:

- 9,281 tons of PCB hazardous waste (soil and concrete)
- 99,698 tons of non-hazardous impacted soil
- 7,054 tons of asbestos-containing buried debris

Confirmation soil samples collected from the base and sidewalls of each remedial excavation were analyzed for the specific contaminants of concern driving that excavation. Confirmation soil sample results indicate that cleanup goals across the Site were achieved, with the exception of three discrete areas where chlorinated solvents remain at depth, as described below.

Residual Soil Contamination (Chlorinated Solvents)

Two areas of residual soil contamination are associated with former Building 502 (Site I). Details can be found in the Final Documentation Report for Section 4008. The other area is associated with former Building 103 (Site K). Details can be found in the Final Documentation Report for Section 1013. The residual soil contamination does not pose a human health risk, given its limited aerial extent and depth below current grade. Existing groundwater remedies are in place to address groundwater impacts due to the leaching of these chlorinated solvents.

- Soil in the vicinity of a former solvent above-ground storage tank, located just southwest of former Building 502, was excavated to depths ranging from 10 to 13 feet below current grade. Based on historical data (e.g. previously-identified soil impacts at depths greater than 13 feet), trichloroethene (TCE) remains in soil at concentrations exceeding the MPCA's SLV at depths greater than 13 feet below current grade. Known concentrations of residual TCE include 8.72 and 8.69 mg/kg.
- Soil just southeast of the former Kendall degreaser, located within the footprint of former Building 502, was excavated to depths ranging from 10 to 18 ½ feet below current grade. The concentration of TCE in one confirmation soil sample (39.5 mg/kg at 16 to 17 feet) exceeded the residential SRV. At this sample location and several others within this discrete area, the concentration of TCE had been increasing with depth when the excavation was terminated.

- Soil beneath and near a portion of the former Building 103 slab was excavated to a depth of five to six feet below current grade, at which point the perched water table was encountered. Ramsey County was only responsible for removing impacted soils in the unsaturated zone. No soil confirmation samples were collected from the base of this remedial excavation due to saturated conditions. Based on historical data, TCE contamination at a concentration greater than the residential SRV is present in a discrete area below the perched water table at depths greater than six feet below current grade. Known concentrations of residual TCE exceeding the residential SRV include 804 mg/kg, 140 mg/kg, 70 mg/kg, and 31 mg/kg.

Redevelopment Plan

While a specific redevelopment plan is not yet available, Ramsey County's response actions have achieved conditions suitable for residential or recreational use across the Site, and the existing land use controls will be lifted accordingly, once Ramsey County has ownership of the full 427 acres. The actual redevelopment plan will likely be a mix of residential, recreational, and office/commercial uses.

Additional assessment of soil vapor impacts will be necessary in some portions of the Site, depending on the specific redevelopment plan, to determine the need for building-specific vapor mitigation systems.

EXHIBIT D
SITE MAP

TCAAP REDEVELOPMENT SITE #2
MPCA VIC PROJECT NUMBER VP22891

Property Subject to Commissioner's Certificate of Completion

