

Appendix A

Summary of Administrative History

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Former Duluth Works Site
Duluth, Minnesota

The site was placed on the National Priorities List under CERCLA in 1983 and the State of Minnesota's Superfund listing in 1984. A Consent Order issued by the Minnesota Pollution Control Agency (MPCA) presently governs the Site. This Consent Order became effective on March 26, 1985, and required U. S. Steel to prepare a remedial Investigation (RI), a Feasibility Study (FS), and a Response Action Plan (RAP) for past disposal practices at the Site.

The original Remedial Investigation report for the Site was completed in 1986 (Barr, 1986). The 1986 Remedial Investigation was prepared in response to the requirements of the 1985 Consent Order between U. S. Steel and the MPCA.

A Record of Decision (ROD) for remedial activities for each operable unit (OU) was issued for the Site in 1989 (MPCA, 1989). The ROD identified No Action as the remedy for the impacted Upland and Estuary Site sediments. However, the No Action remedy was subject to the completion of a Polycyclic Aromatic Hydrocarbons (PAH) treatability study to examine the feasibility of implementing alternative or innovative treatment technologies to address mobility, toxicity or volume of PAH impacted soil or sediment at the Duluth Works Superfund site. The treatability study report was completed in 1990 and concluded that identified and available treatment technologies were not feasible for numerous reasons outlined in the report (Barr, 1990). Consequently, the No Action alternative for Upland and Estuary Site sediment operable units was ratified (Barr, 1990).

Additional questions regarding the protectiveness of the chosen ROD remedies were identified by the United States Environmental Protection Agency (USEPA) after the First Five-Year Review (2003) and by the MPCA after the Second Five-Year Review (2008) of the Site remedies. At the request of the MPCA, investigative activities completed since the Second Five-Year Review were expanded to include a comprehensive evaluation to support a Feasibility Study (FS) for nine Upland and two Estuary study areas. A Remedial Investigation Addendum for the Upland study area sediments was completed in October 2013 (URS, 2013). A Remedial Investigation report for the Estuary study area sediments was completed in March 2013 (Barr, 2013).