



Minnesota Pollution Control Agency

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May 19, 2016

Mr. Thomas Short
Chief, Remedial Response Branch #2
U.S. Environmental Protection Agency
Region V (SR-6J)
77 West Jackson Boulevard
Chicago, IL 60604-3507

RE: U.S. Steel Former Duluth Works Site, St. Louis River NPL Site, Duluth, MN
EPA Superfund ID MND039045430
MPCA Project Numbers SR190, SR272, and SR273
Project Management Transition Request

Dear Mr. Short:

The Minnesota Pollution Control Agency (MPCA) is writing to request that the U.S. Environmental Protection Agency (EPA) take the lead project management role for the contaminated aquatic sediment Operable Units (OUs-I, L, M, N, P, Q, and R), and associated areas without a separate OU designation, known as "I/J" and "unnamed pond", of the U.S. Steel portion of the St. Louis River NPL site (the Site) in Duluth, Minnesota.

In 1995, EPA deferred this Site to MPCA under the Enforcement Deferral Pilot Project Agreement. Under the agreement, MPCA agreed to utilize state authorities to investigate and clean up the site. As specified in that agreement, sites can be removed from the pilot provided that MPCA has exhausted its enforcement authorities. In addition, sites can be removed from the pilot if both agencies mutually agree that there is a more efficient/cost-effective manner of proceeding towards site cleanup. Under the agreement, the removed sites would be subject to CERCLA authority.

MPCA selected a "no action" remedy for the aquatic sediment OUs at U.S. Steel, but in the 2013 Five-Year Review, documented our determination that the remedy is not protective. MPCA believes that the EPA can offer a more efficient manner of proceeding towards site cleanup for aquatic sediments at the U.S. Steel site. The responsible party, U.S. Steel, has entered into a project agreement with EPA's Great Lakes National Program Office (GLNPO) to do a feasibility study and remedial design for sediment remediation at the site. This voluntary partnership represents an opportunity to clean up the contaminated sediments at U.S. Steel in a timely manner, while making progress towards removing use impairments in the St. Louis River Area of Concern.

Under this arrangement, MPCA would retain management of the other U.S. Steel site operable units with soil and groundwater contamination. MPCA also requests this transfer with the understanding that the sediment cleanup will meet the established remedial action objectives and preliminary remedial goals based on protection of human health and the environment, and that EPA will undertake a

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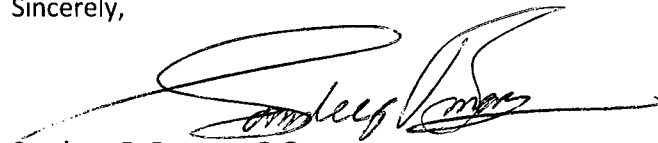
public involvement process. In addition, MPCA requests the ability to provide input into the long-term monitoring and maintenance requirements for the sediment remedy, with the understanding that oversight of the aquatic sediment units could transition back to the MPCA once remedial actions are complete. At that time, long-term monitoring and maintenance activities for the aquatic sediment units can be coordinated with existing monitoring and maintenance requirements for the soil and groundwater operable units.

By requesting that EPA take the lead on remediation of the contaminated aquatic sediments at the U.S. Steel site, the MPCA is not giving up the right in the future to require additional remedial actions if EPA or MPCA determines that the remedial actions implemented under GLNPO process for the aquatic sediment are not adequate to protect human health or the environment.

The MPCA appreciates the willingness of the EPA to consider removing the contaminated aquatic sediment OUs of the U.S. Steel site from the Enforcement Deferral Pilot Project Agreement and taking over the lead project management role for these OUs. MPCA is fully prepared to partner with EPA by providing technical support as needed and when requested. The Site currently has an extensive historical file within the MPCA's archives. The MPCA is willing to provide the file in any format requested by the EPA.

We appreciate your attention in this matter. If you have any questions, please contact me at 651-757-2256, or Crague Biglow at 651-757-2229.

Sincerely,



Sandeep R. Burman, P.G.

Manager

Site Remediation and Redevelopment Section
Remediation Division

SRB/EE:jmp

cc: Leah Evison, U.S. Environmental Protection Agency
Scott Cieniawski, U.S. Environmental Protection Agency
Crague Biglow, Remediation Division, MPCA
Erin Endsley, Remediation Division, MPCA
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