

## Status Update: Service Center Complex

The City of Valley City is on track with its Public Service Center Complex project as it continues to meet environmental requirements and financial expectations. The City has been collaborating with the North Dakota Department of Environmental Quality (NDDEQ) and KLJ Engineering to ensure that any contaminants found are properly mitigated.

Initial fieldwork began in mid-2024 and at the time, the NDDEQ indicated no additional work was required. During the February 2025 testing process, a contamination release was detected, then transferred to the landfill and stockpiled per NDDEQ recommendation.

In June 2025, additional stockpile and excavation samples indicated that they contained elevated levels of contaminants. Several options and costs for contaminated soil management were considered. The closest authorized available disposal site identified was the WM-Dakota Landfill in Gwinner, ND at a cost of approximately \$2 million while treating soil locally was estimated just under \$300,000. The City of Valley City chose to pursue land treatment of the material to preserve soil resources, reduce landfill volume, and reduce overall costs of the soil management.

By following NDDEQ guidelines at the city-owned land on Four Bottle Drive, approved land treatment and guidelines will protect neighboring soil and water. The City has taken diligent steps including continual testing, assessing, and contaminant mitigation.

The City of Valley City has taken a proactive approach throughout the environmental review and soil management process. By working closely with the NDDEQ, incorporating contingency planning, and selecting a cost-effective land treatment solution, the project remains environmentally compliant and financially responsible as it moves forward, assuring the Public Service Center Complex remains in line with the approved budget.

### A DETAILED TIMELINE OF TESTING AND FINDINGS IS PROVIDED BELOW:

#### August 2024

##### Phase I Environmental Site Assessment Completed

- The Phase I report identified a 2003 Phase II ESA with multiple soil samples submitted for laboratory analysis and results all below regulatory criteria. At the time, the NDDEQ, formerly ND Department of Health, issued a letter stating no additional work was required. Further investigation through an updated Phase II ESA was recommended, since the 2003 Phase II ESA may not represent the current site contamination conditions.
  - Nothing was found to stop the project from moving forward. This remains the case as of today.

#### December 2024

- Initial field work conducted with VCPW excavating test holes

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## February 2025

### Phase II Environmental Site Assessment

- Soil and environmental borings were conducted and laboratory analysis was completed.
- Received analytical report on Feb. 20, 2025 with notification of documented soil impacts throughout the site (ie: levels above 100mg/kg).
  - KLJ completed required spill notification to NDDEQ on Feb. 21, 2025.

## April 2025

### Phase II Environmental Site Final Assessment Completed and Submitted to NDDEQ

- During project planning and construction, samples were collected from the soil generated from the proposed building footprint. Calculated total petroleum hydrocarbons (TPH) analytical results of these samples exceeded the North Dakota Department of Environmental Quality (NDDEQ) Cleanup Action Level of 100 mg/kg. These calculated TPH analytical concentrations were comprised primarily of TPH oil range organics (ORO) and diesel range organics (DRO) with little to no gasoline range organics (GRO). Additionally, no benzene, toluene, ethylbenzene, or total xylenes were detected in any of the representative stockpile samples analyzed.
- City contacted NDDEQ about known tanks on site.
  - NDDEQ approved removal of tanks without further documentation. Additional samples were taken and submitted from tank and oil water separator sites.
- Soil from previously identified contamination release was transferred to the landfill, and stockpiled per NDDEQ recommendation.

## May 2025

- Received base sample results from tank and oil water separator removal work.
- Notified by NDDEQ that “numbers don’t look too bad. Addressing impact with redevelopment should be pretty straightforward.”
- Contingencies were built in to the project for the continuation of soil testing and mitigation.

## June 2025

- Continued communication with NDDEQ.
- NDDEQ provided sampling direction and then field samples were collected from stockpiles, bases and sidewalls and submitted to the testing lab.

## July 2025

- Soil tests determined that the current stockpiles were above the allowed 100 mg/kg. A virtual meeting took place with the NDDEQ to discuss management options. The NDDEQ agreed that this material is a good candidate for land treatment of petroleum contaminated soil based analytical concentrations of TPH ORO, TPH DRO, and TPH GRO.



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- Samples taken from the bottom of the open excavation indicated contamination levels below the NDDEQ guideline of 100 mg/kg. Sidewall tests outside the building excavation were greater than the 100 mg/kg, however no further mitigation is needed as establishing a baseline level fulfills the necessary requirement.
- NDDEQ Division of Waste Management allows treated material to be reused. Untreated materials would need to be brought to an authorized landfill for disposal.
  - Costs were assessed to haul the contaminated soils to the WM-Dakota Landfill in Gwinner, ND or haul the contaminated soils to approved local lots and treat in place. Hauling soils to Gwinner would cost approximately \$2 million while hauling soil locally was estimated just under \$300,000.
  - After considering all feasible options for contaminated soil management, the City of Valley City chose to pursue land treatment of the material to preserve soil resources, reduce landfill volume, and reduce overall costs of the soil management.
- NDDEQ did an in-person site visit to assess proposed site locations.
- General Land Treatment Permit was approved for the proposed city-owned lot at Four Bottle Drive with a maximum treatment depth of six inches.
  - Contaminated soil is spread out in a thin layer on a designated area of land. It's then "farmed" like a field—meaning it's tilled, aerated, and sometimes mixed with nutrients or microbes. This process helps natural bacteria and environmental conditions break down the harmful chemicals in the soil over time. The goal is to reduce the contamination to safe levels set by the NDDEQ.

The City will follow treatment processes until the soil meets NDDEQ standards. NDDEQ estimated this process to be complete in 1-2 years if no additional tilling or aeration is done. This process could be expedited if additional action is taken.
  - Permit requires berm to be built 100 feet off adjacent properties. Guidance was given from NDDEQ for berm requirements, and they stated that it needed to be sufficient to prevent run on/off. KLJ was consulted and based on existing topography, berm height placements were established. Site clearing was completed and the berm was constructed per NDDEQ requirements. In addition to the permit required berm, 8-inch biorolls were added around the site as an additional precaution, not as a requirement.
  - Valley City Public Works will be screening debris from the soils after it is hauled and before it is spread to the approved six-inch land treatment depth.
- The City of Valley City continues to move forward as well as keeping the Service Center Complex on budget.