

Lake Superior College

PFAS CHEMICALS AT THE EMERGENCY RESPONSE TRAINING CENTER



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MINNESOTA STATE

Fast Facts

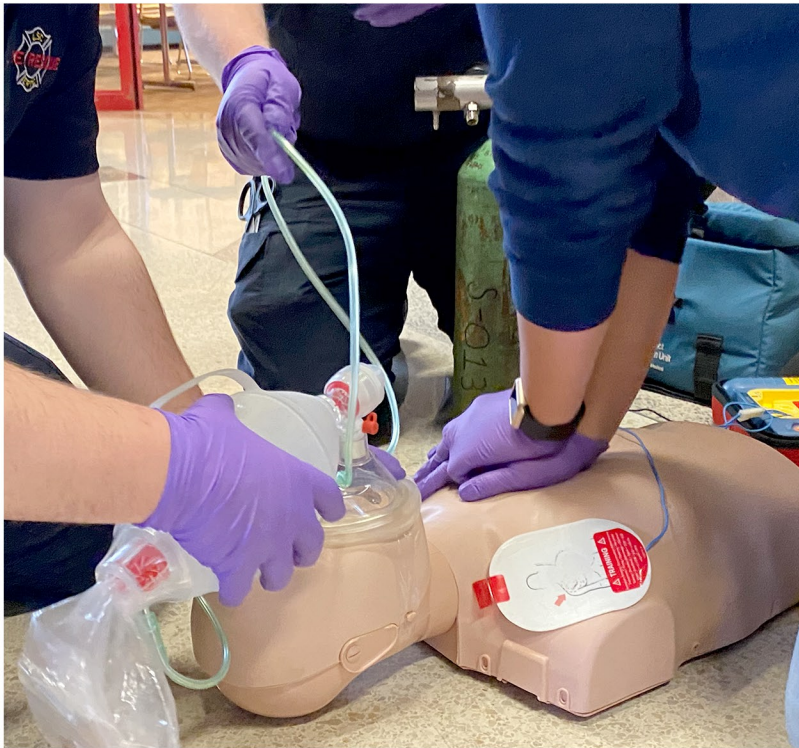
The ERTC was built to train firefighters and emergency response teams in NE Minnesota and regions beyond. The Federal Aviation Administration (FAA) financially supported and helped design the 100+ acre facility. It was commissioned in 1994 and operated by Duluth Technical College (*known now as Lake Superior College*).

*Every year, the Emergency Response Training Center (ERTC) trains approximately **3,500** participants in various positions of trust in the emergency and safety/security response fields. They come from not just the Duluth and NE Minnesota area but from neighboring states. Users save money by not traveling outside of the region for training.*



In a Typical Year, the ERTC...

- Trains 60 **credit-based** students in the Firefighting program
- Trains 80 **credit-based** students in the EMT program
- Holds training classes for 900 **non-credit students** in the firefighting profession from volunteer local and regional fire departments
- Trains 80 Fire Equipment Operators, mostly volunteer regional fire departments.
- Trains 80 Fire Officers from a mix of full-time and volunteer regional fire departments.
- Hosts the Regional Fire Training Academy with 90 attendees
- Partners with over 800 NE Minnesota firefighters for **whole-department** live burn training
- Trains 125 local and **regional law enforcement departments** on critical skills (not counting the on-site gun range)
- Holds training for 75 **security professionals** from various private security agencies
- Hosts over 150 federal government agency officers (such as **Homeland Security and the FBI**) for improvised material training
- Welcomes over 200 **military members** from various branches for a variety of training
- Contracts with large corporations for **employee safety training**, with an average of 500 participants
- Trains 500 participants for CPR/First Aid Certification
- Trains 90 participants for Commercial Driver Training



Importance of First Responder Training

- Quality and meaningful training translates into **effective public service**
- **Performance skills** learned during basic academy sessions **are perishable** and must be practiced and refreshed to maintain quick response actions in crisis situations
- Appropriate facilities foster the development of highly specialized **hands-on skills**

Why Do Outside Groups Like to Use the ERTC?

- **Duluth amenities** are attractive for trainees and their families, especially multi-day training
- ERTC has security features and **large outdoor areas** designed for unique and safe training exercises
- Lake Superior College's status as a **public higher education institution** appeals to other government entities and many community-minded organizations
- Prices for contract training and facilities rentals are reasonable and affordable
- **Expert ERTC staff and faculty trainers** customize training to meet needs without overselling
- Indoor classrooms and equipment are cost effective and maintained to industry standards
- Burn area simulations of house and vehicle fires are **realistic and safe**



History of PFAS at the Facility



The facility's central feature was a six-acre burn site for Aircraft Rescue and Fire Fighting skills training. Aqueous Film Forming Foam (AFFF) - a fire suppressant used to fight flammable liquid fires was utilized. AFFF contained a variety of PFAS compounds which emerging data suggest may increase the risk of serious health problems, including cancer.

Minnesota Pollution Control Agency (MPCA) reviewed the project plans prior to construction. **AFFF was used from 1994 to 2013 consistent with industry standards.** The hazards presented were not well understood during the time it was in use, nor were there Environmental Protection Agency (EPA) or MPCA regulations governing the use of AFFF.

PFAS was first detected by MPCA in surface water and soil surrounding the ERTC in 2009-2010. Additional PFAS testing was performed by MPCA in 2019 and 2022, which found elevated levels in surface waters of Sargent Creek which borders the burn site.

Actions Completed and Underway

LSC is a proactive partner with MPCA in pursuing testing and mitigation strategies.

LSC hired an **environmental consultant** to provide professional/technical expertise in developing and implementing PFAS contamination testing and mitigation strategies.

- In June 2023, LSC enrolled as a **Cooperative Responsible Party** to formalize the working relationship with MPCA.
- As requested by the MPCA, the ERTC performs **interim control measures** to capture and treat firefighting water generated during training activities.
- With the assistance of the environmental consultant, a draft **workplan** was submitted to the MPCA for approval with implementation during the summer of 2024.
- LSC has spent \$776,751 to date on this workplan. This amount is probable for 2025. **Additional future costs are unknown.**

Plans for the Future

There is high potential for significant actions in the near and long-terms based on the workplan and its implementation.

- Analytical results from the summer 2024 workplan execution will drive the next action steps required by LSC. These actions could include additional sampling/testing, mitigation strategies, or remediation of impacted soils and/or groundwater.
- Currently, the scope of activities and associated costs are unknown but are **expected to be extensive and persist for years to come.**
- LSC is seeking **\$2 million in short-term funding** from the State of Minnesota. This will cover testing and remediation costs already incurred from September 2023 to January 2025 and up through June 2026.



Frequently Asked Questions

Because of the PFAS contamination of the soil and water at the ERTC, many have asked questions about the future of the training facility. Hopefully these answers help build understanding.

What is PFAS?

PFAS is a term for a group of human-made chemicals used in a wide variety of applications, such as stain-resistant coatings, personal care products, and firefighting foams. These chemicals were first commercially produced in the 1950's and have recently been the focus of significant regulatory attention. Sometimes, they are referred to as **'forever chemicals'** because they do not break down naturally in the environment.

PFAS was a **required component in the foams** used to train firefighters and rescue teams at the ERTC for over 20 years, in compliance with environmental rules in place at that time.

Now, environmental regulations have changed, and **new criteria exist for PFAS**, at very, very low concentrations (parts per trillion – one drop of water in an Olympic sized pool). For example, PFOS, one of the most studied chemicals in the PFAS family, has a new drinking water criteria (as of April 2024) of 4 parts per trillion.



What is the current situation?

The MPCA has identified LSC as a Responsible Party to identified PFAS contamination, with requirements to investigate the site, investigate conditions offsite, and **stop PFAS-impacted water from leaving the site**. Because PFAS rules are still being developed, it is impossible to accurately estimate the cost of performing these activities, which are anticipated to take many years to complete.

Why not close the facility?

Closing the facility **does not change LSC's responsibility to address the PFAS** impacts at ERTC. The MPCA has directed LSC to determine the extent and magnitude of PFAS impacts and have shared their overarching goal of stopping release of PFAS-impacted materials (stormwater, groundwater, etc.) from the LSC ERTC to the environment.

If the facility is closed, the college remains responsible for completing the investigation activities and implementing remediation actions. These efforts will involve both short-term funding needs for investigations, and likely more significant long-term funding for possible actions including excavating and disposing of soils, capping the fire training area, and water treatment. Environmental monitoring will also likely need to continue even after soils are removed and remediation activities are "complete" to validate success.

Furthermore, closing would be a hardship for LSC's clients such as the area's **mostly smaller fire departments**, Homeland Security, the FBI, and other corporate entities who contract with LSC for training. It would also impact the college's Fire, EMT and Truck Driver training programs.

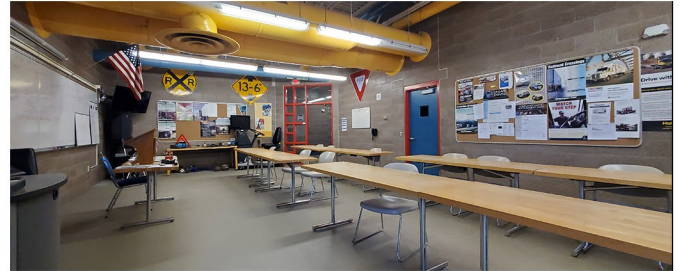
Why not move the programs and activities to another location?

Moving the fire program and related client activities presents separate challenges. There are state and county rules on where and how burning activity are conducted. LSC would have to move existing live-burn staged equipment (multiple Conex burn boxes and storage units) as well as ensure adequate storage to protect fire trucks, equipment, and other materials used during training activities. **A new site would need water, nearby or on-site classrooms, and restrooms.** These factors, along with the overall space needed, make finding alternate locations difficult.

Similarly, the truck driving program needs plenty of flat space, nearby-or on-site storage for the trucks and ancillary equipment as well as nearby or on-site classrooms, and restroom facilities.

Why is LSC unable to access existing government funding mechanisms such as the superfund program?

As a responsible party, LSC does not qualify for these funds. The superfund program was established to fund the clean-up of **orphaned** contaminated properties where the responsible party no longer exists. Other public funds available for PFAS remediation are earmarked for removing PFAS from drinking water supply systems, which the ERTC does not qualify for since it does not supply drinking water to communities.



Why is LSC seeking funding for PFAS remediation?

The expected costs of investigation and remediation are expected to be far more than the LSC budget can sustain. **The college's revenue comes from both state appropriations and student tuition. These dollars are intended for educational purposes.**

As supporters of a clean environment, LSC wants to take corrective action. However, its funding is meant to educate students and maintain our facilities. Spending college funds at the current pace for interim control activities is not sustainable and would result in significant financial hardship.

There will be both short-term and long-term remediation activities and ongoing monitoring required to address the PFAS issues at the ERTC. **The cost of these activities will likely run to several million dollars.** LSC's budget cannot sustain that level of spending.

What are LSC's costs so far?

Since 9/8/23, LSC has spent \$776,751 in total.
The breakdown is as follows.

Water treatment	\$343,155
Environmental consultant fees	\$317,332
Laboratory fees	\$57,985
Equipment and instillation labor	\$12,359
LSC employee costs (conservative est.)	\$45,920
Total	\$776,751

How much does LSC need in the short term?

LSC is seeking **\$2 million in short-term funding from the State of Minnesota**. This will cover testing and remediation costs already incurred from September 2023 to January 2025 and up through June 2026.

Where can we go for current information on PFAS at Lake Superior College?

The college's webpage, lsc.edu/pfas has updates and links to other information sources.



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