



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 21, 1999

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Joel R. Sanders, Code 1868
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Sanders:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed your letter of May 26, 1999 responding to Attachment IV of the MPCA staff letter to you dated January 11, 1999. The MPCA staff letter of January 11, 1999 was for Operable Unit 3 of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site in Fridley, Minnesota, and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency, and the U.S. Navy (Navy).

By your letter of May 26, 1999, it is the MPCA staff's understanding that, at the present time, aside from your corrections regarding the volumes of hazardous substances or wastes disposed at the NIROP Superfund Site, the Navy has no information (other than information already in the administrative record of the NIROP Superfund Site) about the disposal of hazardous substances or wastes on or off of the NIROP Superfund Site, and that the Navy agrees to provide additional information to the MPCA staff in an expeditious manner about the disposal of hazardous substances or wastes on or off of the NIROP Superfund Site, should that information become available to the Navy.

As we discussed on June 15, 1999, the MPCA staff met with Mr. Douglas Hildre of United Defense LP (UDLP) regarding an MPCA staff letter to UDLP and the Navy dated April 22, 1999 (copy sent to you), in which we ask UDLP and the Navy a similar set of questions regarding past disposal of hazardous substances or wastes on the Armament Systems Division Plant. Mr. Hildre stated that he would not answer these questions in this letter; however, Mr. Hildre stated that he would write the staff a letter by mid-July that would summarize past disposal activities of hazardous substances or wastes at the NIROP facility. Since the questions asked in the staff letters of January 11, 1999 and April 22, 1999 are similar, unless you disagree, we will assume that Mr. Hildre's upcoming letter will answer both sets of questions.

Attn.: Joel R. Sanders, Code 1868

June 21, 1999

Page 2

It is our understanding that Mr. Hildre's letter will, at a minimum, include the following information about past disposal activities of hazardous substances and wastes on and off the NIROP facility and at the Armament Systems Division Plant:

- a. a general description of past disposal activities;
- b. identification of data gaps, e.g., identification of years of operation for which there are no records disposal activities;
- c. identification of the FMC Hazardous Waste Site in Fridley as the area were most disposal activities occurred off the NIROP facility and the Armament Systems Division Plant;
- d. information about disposal activities at one or more landfills in the state;
- e. data gaps that prevent conducting a mass balance of hazardous substances purchased versus hazardous substances or wastes disposed on and off the NIROP facility and the Armament Systems Division Plant; and
- f. copies of supporting documentation.

If you have any questions regarding this letter, please contact me at (651) 296-7818:

Sincerely,



David N. Douglas, Project Manager
RCRA/Superfund
Site Remediation Section
Metro District

DND:csa

cc: Douglas Hildre, United Defense LP
Thomas Bloom, U.S. Environmental Protection Agency
Kerry Morrow, U.S. Navy