



Minnesota Pollution Control Agency

August 6, 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Joel R. Sanders, Code 1868
PO 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 to me dated May 26, 1999 regarding questions having to do with waste disposal activities at the Naval Industrial Ordnance Plant (NIROP) as documented in the Initial Assessment Study, dated June 1983, (IAS) prepared by Envirodyne Engineers, Inc. The MPCA staff has also reviewed a letter to me from Mr. Douglas Hildre of United Defense, L.P., (UDLP), dated July 15, 1999, regarding waste disposal activities at NIROP. The letter to me from Mr. Hildre was in response to a letter, dated April 22, 1999, that I sent to the Mr. Patrick K. Morrow of Navy and Mr. Hildre.

This letter summarized salient information that we have received in response to the questions raised from our review of the IAS.

Onsite Disposal Locations.

From the 1940s to 1969, the Navy disposed of hazardous wastes in what is now known as the "North 40." From 1941 to 1983, the Navy disposed of industrial waste in the NIROP sanitary sewer. These (and TCE releases into the air from the proper operation of the ground water treatment remedy) are the only known onsite disposal locations.

Offsite Disposal Locations

From the 1940s to 1969, the Navy disposed of hazardous wastes in what is now known as the FMC Hazardous Waste Site. In addition, the Navy disposed of hazardous wastes at the Waste Disposal Engineering (WDE) landfill in Andover, Minnesota, also known as Solid Waste Landfill 028 or "Landfill S.W. 28."

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The MPCA staff has information that the Navy disposed of hazardous waste at the Oak Grove Landfill, the East Bethel Landfill, and the Anoka County Landfill. Foundry sands were disposed of at the East Bethel Landfill and at WDE Landfill.

Volumes of Waste Disposed of Onsite

From 1941 to 1983, the Navy disposed of approximately 1.891 trillion gallons of industrial waste in the NIROP sanitary sewer. From 1975 to 1996, the Navy removed 247 drums of hazardous waste excavations from the North 40. From 1992 through July 1999, approximately 23 drums of trichloroethylene have been removed from the ground water by the ground water pump and treatment system.

Volumes of Waste Disposed of Offsite

The Navy's IAS and Mr. Hildre's letter of July 15, 1999 document that waste generated at NIROP was also disposed of offsite. In your letter on May 26, 1999, you estimated that the Navy generated approximately 8,423 drums of waste for offsite disposal for the 42-year period from 1941 to 1983 or about 200 drums/year. In Mr. Hildre's letter, he estimates that between 8,000 gallons (145 drums) and 20,000 gallons (363 drums) of waste were disposed of offsite yearly. Since according to the Navy, UDLP has more complete records of waste disposal, the MPCA will use Mr. Hildre's estimates, which are not inconsistent with your estimate. Therefore, in the same 42-year period, between 6090 and 15,272 drums of waste are estimated to have been disposed of offsite.

Conclusions

Based on the information provided in the in the two reports summarized above and information already in MPCA files, the MPCA has made the following conclusions:

1. Most onsite hazardous waste was disposed of in the NIROP sanitary sewer.
2. The Navy disposed of hazardous waste in at least four landfills in Minnesota.
3. Between 1941 and 1983, the Navy disposed of an estimated 6,090 to 15,272 drums of hazardous waste offsite.
4. From the 1940's to October 16, 1969, a period of about 30 years, the Navy disposed of hazardous wastes on what is now known as the FMC Hazardous Waste Site.
5. Not all known Navy documents related to the answers to the MPCA staff's requests for information were provided to the MPCA staff, e.g., employee interviews and aerial photos dated 8/45, 5/4/58, 5/10/62, 4/26/62, 5/9/65, 11/13/67, and 4/23/69.

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6. The Navy has produced to the MPCA staff all documents relative to the potentially responsible party settlement with UDLP and the production of the IAS that are relevant to an understanding of past disposal practices at NIROP.

Requests for Further Information

1. Please provide the MPCA with copies of all the employee interviews and aerial photographs cited in Mr. Hildre's letter to me dated July 15, 1999.

2. To the best of the Navy's beliefs or recollections, is the information found in Mr. Hildre's letter to me on July 15, 1999 a correct attempt to answer the questions raised relative to the IAS in my letter to you dated January 11, 1999 and in my letter to Mr. Hildre and Mr. Patrick K. Morrow dated April 22, 1999?

3. Does the Navy disagree with any of the MPCA conclusions cited above, and, if so, which conclusions does it disagree with and why?

Please provide a response to this request for further information within thirty days of receipt of this letter.

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

Sincerely,



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

DND:kan

cc: Thomas Bloom, US Environmental Protection Agency
Mark Sladic, Tetra Tech NUS, Inc.