

Medicine
Health Physics
Industrial Hygiene
Toxicology
Medical Department/3M

3M Center
St. Paul, Minnesota 55144
612/733 1110

Lynch

3M

September 20, 1985

Theodore E. Schulte
Commander's Representative
Twin Cities Army Ammunition Plant
New Brighton, Minnesota 55112-5000

Reference: Letter of August 19, 1985 Regarding Radioactive
Materials

Dear Mr. Schulte:

Our Static Control Systems Plant Manager, John W. Johnson has asked me to respond to your letter of August 19, 1985, the subject of which was the possible past disposal of low level radioactive material at TCAAP. The basis of the letter, and attached to it, was a memo dated June 11, 1985 from N. A. Metzger to D. L. Terho which summarizes remarks by Mr. Robert Mann regarding the disposal of four barrels of 3M waste at Site G. Included was a description of the protective clothing that was worn by the personnel handling the barrels.

3M operations involving the use of radioactive material have been controlled by the regulations of the U.S. Nuclear Regulatory Commission (NRC) which formerly was the U.S. Atomic Energy Commission (AEC). These regulations are contained in Title 10, Part 20, Code of Federal Regulations. In the 1960's and 1970's these regulations permitted AEC licensees to bury very small quantities of radioactive material which the AEC had determined were not hazardous to public health. However, the provisions of the AEC burial regulations were never used by 3M at TCAAP.

Mr. Mann's description of the disposal technique supports the fact that the barrels of waste did not contain any radioactive material. First, Mr. Mann did not state that the barrels contained radioactivity. Second, if protective clothing had to be worn, the implied hazard was such that the amount of radioactivity could not have been buried under the AEC regulations. Third, foil lined protective clothing described by Mr. Mann has not been used by 3M for work with radioactive material.

SEP 26 1985

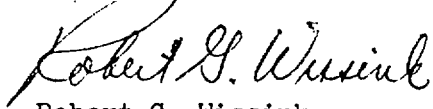
Mr. Theodore E. Schulte

Page 2

September 20, 1985

Your letter of August 19, 1985 is one of several formal and informal inquiries we have received in recent months about possible disposal of low level radioactive waste at TCAAP. The inquiries seem to be founded on the totally false premise that 3M has conducted radioactive disposal activities at TCAAP which are contrary to government health and safety standards when, in reality, our activities have consistently followed government regulations. Inspections by the NRC and AEC have not disclosed any radioactive activities which in any way threatens public health and safety. These inspections have been routinely conducted at least annually during the entire time 3M has been a NRC licensee at TCAAP.

Sincerely,



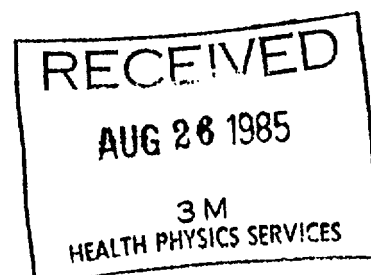
Robert G. Wissink
Chairman, 3M Isotope Committee

RGW:lmo

Attachment

cc: Region III, NRC - D. Wiedeman
Lewis D. Walker - Dept. of the Army
R. Newsome - Dept. of the Army
Darwin Taras - Dept. of the Army
Col Magness - Dept. of the Army

August 23, 1985



Attention: SMCTC-EN

Commander's Representative
Twin Cities Army Ammunition Plant
New Brighton, Minnesota 55112-5000

Reference: Letter of August 19, 1985 from Commander's Representative

Dear Sir:

The above referenced letter was addressed to my attention and across the top of the first page and the second page the subject was listed as: DISPOSAL OF RADIOACTIVE MATERIALS ON THE TWIN CITIES ARMY AMMUNITION PLANT (TCAAP). We very strongly object to the unfortunate title used as the subject of your letter. We have been very careful over our tenure at the Twin Cities Army Ammunition Plant never to bury any radioactive materials.

In my view, the subject of the attached letter should have been: Burial of Unknown Material, etc., etc. As you know, 3M has had a presence at the Arsenal site since sometime in the 1950's with a number of manufacturing operations. In your letter you enclosed a copy of a memo from Nancy Metzger to Darryl Terho describing the burial of four barrels of waste by TCAAP personnel at the request of 3M. This material was of an unknown nature. It is obvious to me that whatever this material was, it was not connected to the Static Control Systems operations at the Arsenal.

Unfortunately, your letter apparently has a copy list to several agencies in the Army. This includes the Deputy For Environment, Safety & Occupational Health, and the people involved with radioactive materials. I am not at all certain that these people will look at this letter and realize that the material in question is of unknown nature. I assume they are going to look at the subject on pages 1 and 2 and assume that it might be radioactive material. I would ask that you contact Robert Wissink at 3M Health Physics with some suggestion as how to inform the people on the copy list of your letter that this material was, in all probability, in no way connected to the radioactive operations in our buildings.

Sincerely,

John W. Johnson
Plant Manager

JWJ:pr

cc: G.D. Cole - 3M/Austin, TX
R.H. Susag - Environmental Pollution Control - 21-2W
R.G. Wissink - Health Physics - 220-2E



DEPARTMENT OF THE ARMY
TWIN CITIES ARMY AMMUNITION PLANT
NEW BRIGHTON, MINNESOTA 55112-5000

REPLY TO
ATTENTION OF:

August 19, 1985

SMCTC-EN

SUBJECT: Disposal of Radioactive Materials on the Twin Cities Army Ammunition Plant (TCAAP)

Minnesota Mining and Manufacturing Company
ATTN: Mr. J.W. Johnson
Building 590
Twin Cities Army Ammunition Plant
New Brighton, MN 55112-5796

Dear Sir:

As you are aware, the TCAAP is engaged in various pollution control cleanup activities. Recently we have discovered information relative to past burial of 3M Company wastes. Attached is a memo from Federal Cartridge Corporation on this subject.

Request that you provide us with any information you may have regarding this activity. Information, in particular to Site G (area landfilled just North of your Building 575) is needed because of our treatment plans (Source Control) at this site.

The Point of Contact is Clarence C. Oster, SMCTC-EN, (612) 633-2301, extension 662.

Sincerely,

Theodore E. Schulte
Commander's Representative

Enclosure

CF:

Office of the Assistant Secretary

ATTN: Lewis D. Walker, Deputy for Environment, Safety and Occupational Health OASA (IL&FM) w/enc1

Cdr, AMC, ATTN: AMCEN-A, R. Newsome w/enc1

AMCSF-P, Darwin Taras w/enc1

DA, ATTN: DAEN-ZCE, Col. Magness, Office of the Chief of Engineers, Washington, D.C. 20310-2600

Cdr, AMCCOM, ATTN: AMSMC-ISE w/enc1

SMCTC-EN

Aug 19, 1985

SUBJECT: Disposal of Radioactive Materials on the TCAAP

CF:

Cdr, AMCCOM, ATTN: AMSMC-OP w/encl

Cdr, USATHAMA, ATTN: AMXTH-AS-R w/o encl

Plt Mgr, FCC-TCAAP, New Brighton, MN w/o encl

Uster

6/13/85 11:11

TO: D. L. Terho

DATE: June 11, 1985

FROM: N. A. Metzger

SUBJECT: Disposal of 3M
on TCAAP

Dr. Russ Susag and Mr. Robert Cattanaach from 3M interviewed Mr. Robert Mann at 1 p.m. June 11th. The interview concerned the disposal of 3M wastes on TCAAP. Mr. Mann described the disposal of all wastes/trash on TCAAP. Everything that could be burned was burned in cages just east of Hamline Ave. by Ryan Lake. This included trash from the 3M buildings. The ashes were then taken to the landfill just north of building 575 (Site G). This burning continued until the State of Minnesota imposed a burning ban in the mid-1960s.

The other main topic of the meeting was the special disposal of approximately four barrels of 3M wastes. This occurred one time only to Mr. Mann's knowledge. Four barrels of 3M wastes were buried in a trench just in front of the landfill edge and covered over. The laborers who handled the barrels were required to wear special suits. These suits were foil lined and entirely covered them.

1960
on 6/1

Dr. Susag and Mr. Cattanaach were interested in obtaining any records pertaining to 3M waste disposal on TCAAP. I said I would make inquiries regarding any work orders, etc., that we may have, but that the volume of records in Building 101 has made that task very difficult.

I also indicated that the records were Government property and must be obtained through the COR office.

N. A. Metzger

N. A. Metzger
Engineering and Maintenance

cc: R. Nielson