



## Minnesota Pollution Control Agency

September 17, 1985

Mr. Clarence Oster  
Twin Cities Army Ammunition Plant  
Arden Hills, Minnesota 55112

Dear Mr. Oster:

This letter references the August 6, 1985, meeting and a August 7, 1985 conference call related to discussion of the Army's proposed Scopes of Work for preliminary evaluation of Twin Cities Army Ammunition Plant (TCAAP) sumps, storage tanks, solvent degreasing operations and farmstead wells. In attendance for both the meeting and phone call were yourself, Karen Waldvogel, U.S. Environmental Protection Agency (EPA), Brian Boevers, Honeywell, Inc., Daryl Terho, Federal Cartridge Corporation (FCC) and Douglas Day, Minnesota Pollution Control Agency (MPCA).

As noted in earlier correspondence and discussions with Army staff, the MPCA believes the Army has not conducted thorough reviews of Army historical files. Nevertheless, MPCA staff believes preliminary TCAAP assessments (listed below) qualify as interim activities, with the understanding that additional information contained in the Army files may alter the response actions necessary to be taken at the facility. MPCA staff comments related to the discussions are summarized below:

### 1. Outside Building Sumps

MPCA staff agrees with the general interim approach for reviewing the historical use of TCAAP sewer sumps. It was requested that all interviews be documented to allow MPCA and EPA review of that activity.

The description of the sumps should include information regarding the time frame in which they were in operation. Past use of the sumps should include a listing of all products used (i.e., not only explosives, but other materials) at the buildings.

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The waste assessment (sludge and/or water) of the sumps should include specific parameters to be analyzed for. Please submit a proposed list of parameters, lab methodologies and detection limits for MPCA and EPA review prior to sampling.

Army and FCC staff (and TCAAP tenants as necessary) should work with Ross Ohman of the MPCA's Regulatory Compliance Section regarding handling, storage and disposal of any hazardous substances detected in the sumps. Darryl Wiedeman of the Nuclear Regulatory Commission, Karen Waldvogel and Douglas Day should be informed immediately of any radionuclides detected in the sumps.

It is understood that no assessment of sump leaks or breaks will occur at this time although additional funding may be provided in the future depending on the sampling results. MPCA staff will expect Army commitment to assess any contamination detected in the sumps that may impact the public health, welfare and environment of TCAAP and the surrounding community.

## 2. Farmstead Well Evaluation

The initial efforts at determining the location and description of pre-TCAAP farmsteads appears to be acceptable to MPCA staff. It was suggested that an attempt be made to locate and interview residents of the pre-TCAAP property along with older TCAAP employees or former employees to assist in locating farmstead wells. Again, the interviews should be formally documented for possible MPCA and EPA review.

Once farmstead wells are located and measured, Minnesota Geological Survey staff should be notified and provided with pertinent information. The information should also be forwarded to appropriate Army, FCC, Honeywell, MPCA and EPA technical staff. No well abandonment should occur without joint concurrence from the various technical staffs noted above and approval from the Minnesota Department of Health.

Assessment of the farmstead wells should include an adequate analysis of the well water. The analysis should include all potential parameters of concern (volatile organic compounds, specific heavy metals, PCB's, general chemistry parameters and radionuclides) with acceptable detection limits. MPCA staff understands that a proposed list of parameters, lab methodologies and detection limits will be provided by the Army at a future TCAAP technical meeting.

## 3. Solvent Degreasing Operations

MPCA staff finds the proposed interim efforts to inventory current and past TCAAP degreasing operations to be acceptable. Again, it will be useful to document interviews of current or past TCAAP employees familiar with the degreasing operations to get a better historical perspective and for possible MPCA and EPA review.

The specific type of solvents used by each generator at each TCAAP location should be identified in the summary of operations.

It is understood that no actual assessment activities will occur under the proposed scope of work. Again, MPCA staff believes assessment activities should occur if contamination has resulted from the degreasing operations.

#### 4. Storage Tanks

MPCA staff finds the proposed interim efforts to inventory TCAAP storage tanks to be acceptable with the understanding that all TCAAP employee interviews will be documented for possible MPCA and EPA review.

The description of the storage tanks should include information regarding the location of the nearest wells to the tanks.

If an unknown product (by either odor or appearance) is noted in any of the storage tanks assessed, safety precautions should be taken prior to sampling the tank's contents for appropriate parameters (VOC's, PCB's, etc.).

It does not appear that any overall environmental assessment of the storage tanks is proposed under the current scope of work. MPCA staff believes the Army should propose and take necessary steps to assess any significant soils and/or ground water contamination resulting from past or present tank leakage.

If you have any questions regarding the above comments, please contact Douglas Day, Project Leader at 296-7388.

Sincerely,



Larry P. Christensen, Supervisor  
Superfund Unit  
Site Response Section  
Division of Solid and Hazardous Waste

LPC:mec

cc: Darryl Terho, Federal Cartridge Company  
Brian Boevers, Honeywell, Inc.  
Kelton Barr, Barr Engineering Company  
Karen Waldvogel, U.S. Environmental Protection Agency  
Bruce Bloomgren, Minnesota Geological Survey  
Darryl Wiedeman, Nuclear Regulatory Commission  
Michael Crosser, Donahue & Associates  
Jim Nye, Minnesota Department of Health