



MINNESOTA HISTORICAL SOCIETY
Minnesota State Archives

ATTORNEY GENERAL
Environmental Protection Division

An Inventory of Its Twin Cities Army Ammunition Plant Files

OVERVIEW OF THE RECORDS

Agency: Minnesota. Attorney General. Environmental Protection Division.
Series Title: Twin Cities Army Ammunition Plant files.
Dates: 1978-1999.
Quantity: 4.6 cu. ft. (5 boxes and 1 half-height oversize box).
Location: See Detailed Description section for box locations.

HISTORY OF THE TWIN CITIES ARMY AMMUNITION PLANT SUIT

In 1978, the U. S. Army Toxic Hazardous Materials Agency prepared a report that described waste handling, treatment, storage, and disposal activities at the Twin Cities Army Ammunition Plant [TCAAP] site in Ramsey County. It indicated that areas of the site, which was federally owned but contractor-operated by Federal Cartridge Corporation (after 1985, Federal-Hoffman, Inc.), had been used since its inception in 1941 for the disposal of waste solvents, acids, caustics, heavy metals, and other production wastes. The Attorney General's office became aware of the report in 1981 and launched a series of investigations into hydrologic, geologic and contaminant conditions at the site. Findings showed that the soil, surficial waters and ground waters on the property were contaminated, along with private, municipal and commercial wells in the nearby vicinity.

In 1987, the state was prepared to file a civil suit to establish liability for and recover damages caused by contamination released at the site. The potential defendants in the case included the United States of America, U. S. Department of Defense, U. S. Department of the Army, and private corporations, Federal-Hoffman, Inc. and Honeywell, Inc. The latter had conducted operations at the site since 1958. The state was also prepared to sue Federal-Hoffman, Inc. and Honeywell, Inc. for violations of the Resource Conservation and Recovery Act, Clean Water Act, and Environmental Response, Compensation, and Liability Act. Before the case went to court, however, an out of court settlement was reached between the State of Minnesota, the U. S. Environmental Protection Agency, and the U. S. Army.

SCOPE AND CONTENTS OF THE RECORDS

These records were compiled by the Attorney General's office, both in preparation for the lawsuit and as documentation of events following the settlement. Many of the documents were received from other governmental bodies, including the Minnesota Pollution Control Agency, U. S. Environmental Protection Agency, U. S. Army, U. S. Department of Defense, and the cities of New Brighton, Arden Hills, St. Anthony, and Shoreview.

Divided into correspondence (1981-1999), reports (1978-1997), and subject files (1978-1997), the records include surveys, studies, memos, correspondence, and a wide variety of such legal documents as complaints, waivers, agreements, contracts, subpoenas, violation notices, permits, pleadings, affidavits, and transcripts. Most of the documents relate directly to the suit and cover such topics as environmental investigation and assessment of the site and surrounding communities, particularly in relation to ground and surface water contamination; document management; Freedom of Information Act material; land use issues; National Pollutant Discharge Elimination System and Resource Conservation and Recovery Act materials; and work done by the consulting firm, Camp Dresser & McKee Inc.

RELATED MATERIALS

Records relating to the TCAAP are also contained in the Bruce F. Vento Papers (cataloged separately).

INDEX TERMS

These records are indexed under the following headings in the catalog of the Minnesota Historical Society. Researchers desiring materials about related topics, persons or places should search the catalog using these headings.

Topics:

Hazardous waste sites remediation--Law and legislation--Minnesota.
Liability for soil pollution damages--Minnesota.
Liability for water pollution damages--Minnesota.
Soil pollution--Law and legislation--Minnesota.
Soil remediation--Minnesota.
Water--Pollution--Law and legislation--Minnesota.

Places:

Shoreview (Minn.).
Saint Anthony (Hennepin County, Minn. : 1945-).
New Brighton (Minn.).
Arden Hills (Minn.).

Organizations:

Camp, Dresser & McKee.
Federal Cartridge Corporation.
Federal-Hoffman, Inc.

Honeywell Inc.
Minnesota Pollution Control Agency.
National Pollutant Discharge Elimination System.
Twin Cities Army Ammunition Plant (U.S.).
Twin Cities Ordnance (New Brighton, Minn.).
U.S. Army Toxic Hazardous Materials Agency.
United States. Army--Ordnance facilities.
United States. Dept. of Defense.
United States. Environmental Protection Agency.

Types of Documents:

Legal instruments.

Titles:

United States. Comprehensive Environmental Response, Compensation, and Liability Act of 1980.
United States. Federal Water Pollution Control Act.
United States. Freedom of Information Act.
United States. Resource Conservation and Recovery Act of 1976.

ADMINISTRATIVE INFORMATION

Preferred Citation:

[Indicate the cited item and folder title here]. Minnesota. Attorney General.
Environmental Protection Division. Twin Cities Army Ammunition Plant Files. Minnesota
Historical Society. State Archives.
See the Chicago Manual of Style for additional examples.

Accession Information:

Accession number(s): 15,775(mss), 2003-76

Processing Information:

Processed by: Margaret Basket, June 2003; Cheri Thies, November 2003
PALS ID No.: 0900323778

DETAILED DESCRIPTION OF THE COLLECTION

Note to Researchers: To request materials, please note both the location and box numbers shown below. Each file consists of one folder unless specified otherwise.

Location	Box	
107.I.11.4F	1	Correspondence, January 1981 – May 1999. 6 folders. Arranged in chronological order. January 1981 – 1982. 1983. 1984. 1985. 2 folders. 1986 – May 1999.

Location	Box	
107.I.11.4F	1	<p>Correspondence, reports, and memos, July 1986 – November 1996. 6 folders.</p> <p>Arranged in chronological order/numerical order; labeled Volume 2. Each document is numbered, which was apparently done upon receipt at the Attorney General’s office. The documents are numbered 84-351; the location of document nos. 1-83 is unknown. There is an index sheet in each folder listing document number, date, sender, recipient, and a short content description.</p> <p>July-August 1986. September-December 1986. January-April 24, 1987. April 24 – May 29, 1987. June 1987 – March 3, 1988. March 1988 – November 1996.</p> <p>This folder follows in this series but the documents are not numbered.</p> <p>Reports, 1978–1997.</p> <p>Arranged in chronological order.</p> <p>Installation Assessment of Twin Cities Army Ammunition Plant, Report No. 129, October 1978. By U. S. Army Toxic and Hazardous Materials Agency.</p> <p>Environmental Contamination Survey, Phase I Report, Volume I, May 16, 1983. Contamination Report; by STS Consultants.</p>
107.I.11.5B	2	<p>Environmental Contamination Survey, Phase I Report, Volume III, May 16, 1983. Geotechnical Appendix; by STS Consultants.</p> <p>Public Comment Draft, Feasibility Study, Temporary Water Supply, New Brighton, Minnesota, May 27, 1983. By CH2M Hill for the Environmental Protection Agency (EPA).</p> <p>Report on “Preliminary Survey of Industrial Waste Disposal Practices for the New Brighton/Arden Hills, Ramsey County, Minnesota,” September 1983. By Paul A. Hess; draft copy.</p> <p>Project Manual for St. Anthony, Minnesota Operable Unit, Granular Activated Carbon Treatment Plant and Connecting Water Main, October 1989. By Camp Dresser & McKee Inc.</p>

Location	Box	
107.I.11.5B	2	<p>Final Report, Phase 1A, Multipoint Source Ground Water Remedial Investigation, New Brighton/Arden Hills, Minnesota, Volumes 1 and 2, February 1991. 2 folders. By Camp Dresser & McKee Inc.</p> <p>Installation Restoration Program: Remedial Investigation Report for the Twin Cities Army Ammunition Plant, Volume 4, Appendices A-F, (Final Report), April 1991. 3 folders. By the U. S. Army Corps of Engineers Toxic and Hazardous Materials Agency.</p>
106.H.16.8F-1	6	<p>Installation Restoration Program: Remedial Investigation Report for the Twin Cities Army Ammunition Plant, Volume 4, Appendix H, [April 1991]. 22 bound sheets. Drawings prepared by the Argonne National Laboratory, March 1991.</p> <p>Sheet 1: Base Map. Sheet 2: Unit 3 Groundwater Contours November 1987, Quarter 16. Sheet 3: Unit 4 Groundwater Contours November 1987, Quarter 16. Sheet 4: Unit 3 111TCE Concentrations November 1987, Quarter 16. Sheet 5: Unit 3 111TCE Concentrations November 1988, Quarter 20. Sheet 6: Unit 3 12DCE Concentrations November 1987, Quarter 16. Sheet 7: Unit 3 12DCE Concentrations November 1988, Quarter 20. Sheet 8: Unit 3 TCLEE Concentrations November 1987, Quarter 16. Sheet 9: Unit 3 TCLEE Concentrations November 1988, Quarter 20. Sheet 10: Unit 3 TRCLE Concentrations November 1987, Quarter 16. Sheet 11: Unit 3 TRCLE Concentrations November 1988, Quarter 20. Sheet 12: Jordan Sandstone Elevation. Sheet 13: Jordan Sandstone Thickness. Sheet 14: Prairie du Chien Group Elevation. Sheet 15: Prairie du Chien Group Thickness. Sheet 16: Bedrock Surface Topography. Sheet 17: Unit 1 Elevation. Sheet 18: Unit 1 Thickness. Sheet 19: Unit 2 Elevation.</p>

Location	Box	
106.H.16.8F-1	6	Sheet 20: Unit 2 Thickness. Sheet 21: Unit 3 Elevation. Sheet 22: Unit 3 Thickness. [0.55 cu. ft. empty]
107.I.11.5B	2	Assessment of Applicable or Relevant and Appropriate Requirements (ARARs) and To-Be-Considered (TBC) Guidance for Operable Unit 2 (OU-2) at Twin Cities Army Ammunition Plant, Minnesota, Final Regulatory Report, February 6, 1997. Published by the U. S. Army Environmental Center. Assessment of Applicable or Relevant and Appropriate Requirements (ARARs) and To-Be-Considered (TBC) Guidance for Operable Unit 2 (OU-2) at Twin Cities Army Ammunition Plant, Minnesota, Final Regulatory Draft, March 21, 1997. Published by the U. S. Army Environmental Center.
107.I.11.6F	3	Subject files, 1978–1997. Arranged in alphabetical order. Access for monitoring wells correspondence, 1990–1992. Access for monitoring wells agreements, September 1984 – April 1985. Alliant mixed waste request, January 1994. Army document inventory list, undated. Army Environmental Quality Regulations, Regulation No. 200-2, January 3, 1980. Army/Honeywell Agreement, July 8, 1985. Assessment of Applicable or Relevant and Appropriate Requirements (ARARs) for Groundwater Cleanup, July 1992 – March 1994. Environmental Center, March 21, 1997. Base closure, 1993-1994. [Minnesota Pollution Control Agency (MPCA)] board authority issue meeting, April 23, 1985. Board item, [1987]. Board items for MPCA meetings, July–August 1986. Corrective Action Management Unit (CAMU) Rule/ARAR Waiver, 1994–1996. Complaint, July 1987. State of Minnesota v U. S. Dept. of Defense, U. S. Dept. of the Army, U. S. Dept. of Justice, Federal-Hoffman, Inc., and Honeywell, Inc.

Location	Box	
107.I.11.6F	3	<p>Congressional hearings: Transcript of statement by Thomas Kalitowski, Director of MPCA, December 20, [?].</p> <p>Contracts, 1984-1986.</p> <p>Contract and correspondence, Camp Dresser & McKee and MPCA, 1984-1991.</p> <p>Correspondence related to ARARS of OU-2, 1996–1997.</p> <p>Department of Natural Resources (DNR) property/wildlife, 1992.</p> <p>Document management file, January–October 1987.</p> <p>Department of Defense/Environmental Protection Agency (DOD/EPA) Memorandum of Understanding, November 1985.</p> <p>EPA/MPCA cooperative agreements, 1982–1992.</p> <p>EPA guidance, 1985–1986.</p> <p>Excessive Army property, January 1994.</p> <p>Executive orders, 1986.</p> <p>Expert witness, 1986.</p> <p>Federal Cartridge Articles of Incorporation, 1985.</p> <p>Federal Cartridge Corporation to MPCA, A Response and Perspective, Third Amended Request for Response Action Regarding Twin Cities Army Ammunition Plant, May 10, 1985. 2 folders.</p> <p>Prepared by Federal Cartridge Corporation and Harstad & Rainbow.</p>
107.I.11.7B	4	<p>Federal Facilities Agreement, with attachment, 1987. 2 folders.</p> <p>Federal Hoffman data request, 1987.</p> <p>Freedom of Information Act (FOIA) material, 1978-1982.</p> <p>Graphics, undated.</p> <p>Hazardous Waste Fee Rules, 1991.</p> <p>Health Risk Assessment, Preliminary, August 1990.</p> <p>Honeywell Insurance Company subpoena, 1989.</p> <p>Information brochure, undated.</p> <p>Interagency agreements, undated and 1987.</p> <p>Land use issues, 1995.</p> <p>Master Log, Pleadings, 1987.</p> <p>Memos, May 1981 – April 1990. 2 folders.</p> <p>Arranged in chronological order.</p> <p>Meeting documents, January 22, 1985.</p> <p>Agenda and supporting correspondence.</p> <p>Minnesota Geological Survey contract, November 1987.</p> <p>Moore Property claim, 1990.</p> <p>New Brighton/Arden Hills cooperative agreement, June 1983.</p> <p>New Brighton documents, 1983–1986.</p> <p>News clippings, 1987, 1995.</p>

Location	Box	
107.I.11.7B	4	<p>Notice of Violation, Resource Conservation and Recovery Act (RCRA), August 1986.</p> <p>Notice of Violation, MCPA to U. S. Army, December 1990.</p> <p>Notices, 1983–1986.</p> <p>National Pollutant Discharge Elimination System (NPDES) Permit, 1986–1996.</p> <p>Press releases re settlement, 1987.</p> <p>Proposed EPA RCRA (Resource Conservation and Recovery Act) Munitions Rule, 1995.</p> <p>Public comments on agreement, September 1987.</p> <p>RCRA correspondence, May 1986 – February 1993.</p> <p>RCRA Permit, Bill Sierks notes, 1986–1990.</p> <p>RCRA Permit (12/87 Draft), 1987- 1988.</p> <p>RCRA Final Permit, August 1991.</p> <p>U. S. Army, Alliant Techsystems, Inc., Federal Cartridge Company for a Hazardous Waste Storage and Treatment Facility.</p> <p>Record of Decision for Gradient Control System, September 25, 1987.</p> <p>Remedial Action Plan Status Report, June 14, 1985.</p> <p>Remedial Action Program Update Presentation, July 1986.</p> <p>Remedial Action Program Update Presentation, August 1986.</p> <p>St. Anthony/PCA contract, 1989–1993.</p> <p>St. Anthony pleadings, 1986-1987. 2 folders.</p>
107.I.11.8F	5	<p>St. Anthony – Transfer of title to facility, 1994-1996.</p> <p>St. Anthony Treatment Plant/Water Main Project supplemental documents, 1989-1991.</p> <p>St. Anthony Village Water Contamination Report to Elected Officials, July 16, 1986.</p> <p>Shoreview claim, May 31, 1988.</p> <p>Site F, Affidavits Re: Property contamination, 1997.</p> <p>Site status report, November 2, 1992.</p> <p>Superfund Contract with City of St. Anthony, 1989-1992.</p> <p>Superfund requests to EPA, 1983.</p> <p>Tour for MPCA Board members, August 21, 1986.</p> <p>Water tower wastes, February 1994.</p> <p>Wells issue, 1996–1997.</p> <p>Underground Storage Tank Technical Standard Rules (MN Rules Ch. 7150) adopted May 21, 1991, 1991.</p> <p>U.S. House of Representatives Subcommittee on Readiness Re: Status of DOD Negotiations on Interagency Agreements Involving Toxic Waste Cleanups in Military Installations, November 10, 1987.</p> <p>Werlein Lawsuit: Deposition transcript of Paul Goudreault, 1989.</p> <p>Yepma v U. S. America, et al., 1983–1989.</p>