**Former Twin Cities Army Ammunition Plant (TCAAP)**

**Restoration Advisory Board Meeting**

**Conducted Virtually using Microsoft Teams**

**January 14, 2021**

**Time/Place**: 6:00 pm, January 14, 2021 – Microsoft Teams

**Attendees:** Approximately 36 people attended the meeting including 10 Restoration Advisory Board (RAB) community members and 11 non-community members. Names of attendees are included in the attachment.

**Agenda:** TCAAP History, RAB Presentation, CERCLA Discussion, Update on Cleanup Work to Date and Planned Cleanup Activities are included in the agenda.

**Introduction:** Ms. Cathy Kropp (USAEC) provided a brief introduction, including administrative information and plans for the evening.

**Presentations:**

TCAAP History, Linda Albrecht (USAEC)

* TCAAP was constructed in 1943 and set up to manufacture small caliber ammunition. Most of the ammunition manufacturing occurred during wars and conflicts, such as World War II and the Korean Conflict. There were more than 300 structures and many tenants. Most tenants performed nonmilitary industrial-based activities. ATK was the major government contractor. Northrup Grumman who now owns ATK, is partnering with the Army in the cleanup of past contamination.
* In 1982 the New Brighton/Arden Hills superfund site, which is all of the original TCAAP facility and the plumes as they extended out into New Brighton, was added to the National Priorities List (NPL). In December of 1987, the USEPA, the US Army and the MPCA entered into a Federal Facilities Agreement (FFA) which governs the cleanup of TCAAP.
* Documents for OU1, OU2, and OU3, including Records of Decision (RODs) and Explanation of Significant Differences (ESDs) are available at <https://tcaap.org/resources-2/>
* The majority of the TCAAP property has been transferred out of Federal ownership, however, for the purposes of cleanup, references to TCAAP include all the installation property the Army owned in 1983, when TCAAP was placed on the NPL. This is also referred to as OU2 and is considered on-post.
* The Army has taken a lot of actions to clean up the former TCAAP site, including source removal, groundwater treatment, monitored natural attenuation, capping, soil treatment, and soil incineration. The soil and surface water cleanup actions required for OU2 have been completed and OU2 soil and surface water was delisted from the NPL in September of 2019. While Land Use Control (LUC) for this area now allows access by the general public, cleanup work at Round Lake and OU1, OU2, and OU3 groundwater continues.
* The Army continues to monitor for emerging contaminants, such as 1, 4 Dioxane, and Per- and Polyfluoroalkyl substances (PFAS). A preliminary PFAS assessment will be conducted at TCAAP in 2021.
* The Army’s cleanup activities are documented in the Annual Performance Report (APR). APRs from 1988-2019 are available at <https://tcaaprab.org/resources-2/> in addition to the Installation Action Plan (IAP), Five Year Review Reports and Land Use Control (LUC) documentation.

RAB Presentation, Cathy Kropp (USAEC)

* The Purpose of a Restoration Advisory Board (RAB) is to give the community an opportunity to be involved in the environmental restoration process. This includes sharing questions, ideas, and concerns of the community so the Army’s decisions are more informed. The TCAAP RAB was established in 1996 and was active until approximately 2015.
* The RAB is co-chaired by the Army and the Community and is made up of community members and government organizations (Federal, State, Local, and Tribal). For the TCAAP RAB the government organizations are called “non-community members” in the operating procedures.
* RAB community members have several duties, including attending meetings, providing input, representing the community and communicating community concerns to the RAB. RAB community members review, evaluate, and comment on restoration related documents and materials, and represent and communicate RAB issues to the community. RAB members serve without compensation.
* Non-community members also attend the meetings, review documents and other materials related to Restoration. They ensure that state, local, and federal environmental standards and regulations are identified and addressed where appropriate. They facilitate flexible and innovative resolutions of environmental issues and concerns and assist in education and training for RAB members.
* The community co-chair has several responsibilities including coordination with the Army co-chair and community members to prepare meeting agendas, ensure community issues and concerns related to restoration are raised, and to ensure training needs are met. The co-chair will report back to the community and coordinate with other RAB members to ensure segments of the community are adequately represented at RAB meetings. The co-chair will call RAB meetings to order and facilitate the meeting. The co-chair will serve for a two-year term without compensation and may run for re-election.
* TCAAP RAB member-specific duties include developing and maintaining an information network on RAB activities and RAB requests for public comment, opinion, and questions. As requested by city or civic organizations, the RAB may provide representatives to attend meetings and address RAB operations or requested subjects. For example, a RAB member may give a presentation to another group if requested.
* The Army is required to solicit for interest in the RAB and as part of this effort the Army posted in newspapers in April 2020 and also in the Arden Hills Newsletter. By November there was enough community interest to continue the RAB.
* During the pandemic, meetings will be held virtually but all meetings are open to the public. When the pandemic is over and it is again safe to gather in person, the RAB meeting venue will be in the vicinity of the installation.
* Linda Albrecht is currently acting as the Army co-chair. The current community co-chair would like to retire duties and pass to someone new. A new community co-chair will need to be elected.
* The Army proposes additional non-community RAB members beyond what is currently in the TCAAP operating procedures, to include Northrup Grumman (previously Orbital ATK), MDNR, USFWS, Minnesota Army National Guard Arden Hills Army Training Center (AHATS), Ramsey County, City of Arden Hills, City of New Brighton, City of Shoreview, and St Anthony Village.
* The current RAB operating procedures allow no more than 19 community members. Currently less than 19 community members have submitted RAB interest forms.
* The current operating procedures will need to be validated and updated by the RAB.
* Ms. Kropp asked the previous RAB members if they would like to continue to serve. The three previous members would like to continue to serve.
* Ms. Kropp verified continued interest among those present that submitted interest forms. Two members were absent, one member is to be determined.
* Ms. Kropp took a survey of interest in serving as community co-chair. One community member present at the meeting expressed interest in serving this term. One other community member expressed interest on the RAB form but was not present at the meeting to confirm.
* The community co-chair election will be a priority action item at the next RAB meeting.
* The next RAB meeting will include reviewing/approving minutes of last meeting, voting on the new community co-chair and the Army’s recommendations for non-community members. The next meeting will also include a review of the mission statement and operating procedures with updates as needed. The Army will also provide an update on cleanup progress at TCAAP for each open site.
* The TCAAP RAB website has recently been updated and the Army invites feedback. The website is available at <https://tcaaprab.org>.
* Ms. Kropp asked the RAB if there are any suggestions on how often the RAB should meet. One member suggested monthly to start. No members opposed.
* The Army maintains a mailing list that is separate from the RAB member list. Those that would like to stay informed but do not want to be a RAB member can sign up for the mailing list by emailing [usarmy.jbsa.aec.mbx@mail.mil](mailto:usarmy.jbsa.aec.mbx@mail.mil) or calling Cathy Kropp at 443-243-0313.
* TCAAP documents are available for public review at the information repository located at Arden Hills Army Training Site. Mary Lee must be contacted at 651-282-4420 to arrange access. More recent documents can be sent via email.

CERCLA (Robert Reine, USAEC)

* The program used to govern cleanup at TCAAP is the Defense Environmental Restoration Program (DERP). As part of this program, DoD identifies, evaluates and where appropriate, remediates contamination resulting from DoD activities.
* The Army has authority under DERP to conduct immediate removal actions for constituents that present an immediate threat to human health or the environment. The Army is required to comply with applicable statutes, regulations, executive orders and other legal requirements governing response actions to contamination.
* Army regulation AR 200-1 governs how the Army conducts screening for hazardous substances, conducts studies for response actions and it allows the Army to establish an information repository and administrative record to provide public access to information. It also allows the Army to establish a community involvement plan (CIP) and a RAB.
* TCAAP has a negotiated federal facilities agreement that governs interagency relations.
* The primary associated federal statutes are the Comprehensive Environmental Response, Compensation and Liability Act (CERLCA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). CERLCA, NCP and EPA guidance documents provide a framework for remediation at TCAAP.
* The Army has both NPL sites and non-NPL sites. EPA is the lead agency in NPL site cleanup, and the Army is the lead agency in non-NPL site cleanup. States are consulted in both scenarios.
* The CERCLA process phases include the Preliminary Assessment (PA), Site Inspection (SI), Hazard Ranking System (HRS) Score, Remedial Investigation (RI), Feasibility Study (FS), the Proposed Plan (PP), the Record of Decision (ROD), the Remedial Design (RD)/Remedial Action – Construction (RA-C), Remedial Action – Operation (RA-O), Long Term Management (LTM), Site Closeout and the Five-year Review.
* Each CERCLA phase can take years to complete. The Army will engage the community through the RAB process to make sure they are aware, updated, and informed of the actions going on at the site.
* Sometimes circumstances occur that require a modification to the decision such as when an emerging contaminant is found that requires additional remedial action. The Army documents these changes either through a ROD Amendment or through an Explanation of Significant Differences (ESD). The Army has developed ESDs to document the need to add treatments for 1,4 dioxane at TCAAP for OU1 and OU2.

Update on Cleanup Work to Date and Planned Cleanup Activities, Linda Albrecht

(USAEC):

* Most recently, the Army has conducted a comprehensive well inventory, optimization of OU1 and OU2, updated land use controls and updated the website. The remedial investigation/feasibility study (RI/FS) for Round Lake is being finalized and the admin record/information repository was reviewed, and the associated index updated.
* As part of the OU1 optimization, the Army has collected geophysics data and is looking to identify best locations for new extraction wells.
* The Army would like to relocate an extraction well(s) near the center of the plume to improve effectiveness of contaminant removal.
* Optimization study results will be presented to EPA, MPCA and New Brighton in 2021.
* As part of the OU2 optimization, more extraction wells will be installed closer to the source.
* The Army will be installing a secondary treatment called the Source Groundwater Recovery System (SGRS). The Army anticipates this system being operational by 2022. The existing facility will continue to operate for the boundary wells. SGRS will treat both 1, 4 Dioxane and Trichloroethylene (TCE).
* The TCAAP Groundwater Recovery System (TGRS) received upgrades, including facilitation of wireless communication and control panel upgrades.
* The 2020 Land Use Control Remedial Design (LUCRD) Revision 6 was completed and documents partial delisting of soils in OU2 and updated LUCs based on delisting. Additional updates were made to include OU1 and OU3. The LUCs are primarily in place to prevent uses of contaminated groundwater, and to prevent any exposure to contaminated soils at levels that would pose an unacceptable risk.
* OU3 is being treated by continued monitored natural attenuation. Annual groundwater sampling results are available in the Annual Performance Report.
* Round Lake was originally part of TCAAP but was transferred to USFWS in 1974. Contamination from historical releases of hazardous substances from TCAAP to Round Lake is largely confined to the upper 1 foot of sediment.
* The EPA, MPCA and the Army have been working to reach a consensus on ecological risk and remedial action objectives.
* With input from EPA, MPCA, USFWS and MDNR, the Army is planning to issue a final supplemental RI/FS within the next month. This will be available to the community for review once the EPA and MPCA accept the document.
* Future Actions at OU1 include finalizing a location and installing new extraction well (s). Future actions for OU2 include Site A vapor intrusion investigation, USGS treatability study at Site K and SGRS construction. Groundwater monitoring will continue at OU3 and the RI/FS for Round Lake will be finalized, and a proposed plan developed. The Army will hold a public comment period and public meeting on the proposed plan, followed by the development of a ROD based on stakeholder input.

Website – Updated Pages and Content, (Cathy Kropp, USAEC)

* The Army has made improvements to the [www.tcaaprab.org](http://www.tcaaprab.org) website and will be posting updates on the website as well as documents for review. Several reports are available for download on the site, such as the 2020 LUCRD Revision 6 report and the Annual Performance reports.
* The website has an area where questions and concerns can be submitted. The property description and site history are also available in the background section as well as the property status, regulatory framework and RODs. There is also a section for operable units with information and maps (including site descriptions). Additional information includes news, fact sheets, and an Army acronym list.
* The website has a RAB section where meeting information will be placed, including meeting minutes. The information tab has contact information that can be used to ask questions or make suggestions/recommendations. It also has document repository information.
* The Army invites feedback on the website.

RAB Administrative Items

* If the RAB meets within the next month there may not be any cleanup updates; however, the RAB could hold an administrative meeting to review the operating procedures, mission statement, and to vote on a community co-chair. An administrative meeting is also open to the public.
* Ms. Kropp asked the RAB to recommend possible dates in February or early March for the next meeting.
* One member proposed a Monday or Tuesday, first or second week of the month at 7pm.
* The Army is able to attend Monday meetings if they are virtual, however the Army typically cannot attend in-person Monday meetings because it requires travel on Sundays.
* One member noted a preference for 7pm.
* St Anthony has city council evening meetings on the second and the fourth Tuesday of the month.
* February 16 at 7pm was proposed for the next meeting date. There were no objections to the proposed date.
* The February meeting will be an administrative meeting.
* A member recommended that the next meeting include member introductions as an agenda item. Introductions could include their interest in the RAB, who they represent and where they are located.
* It was recommended that members provide biographies or brief summaries of backgrounds and possibly post biographies on the RAB website.
* If RAB members would like to provide biographies this will be a purely voluntary process.
* The Army will include a privacy statement for signature. The biographies can be circulated among members if members agree, but they will not be posted on the website.

**ATTENDEES**

**Non-Community RAB Members Present**

1. Linda Albrecht (Acting Army Co-chair)
2. Thomas Barounis (EPA)
3. Brigitte Hay (MPCA)
4. David Brown (Northrop Grumman)
5. Melissa Collins (DNR)
6. Nicole Menard (USFWS)
7. Mary Lee (MN ARNG Arden Hills Army Training)
8. Martha Faust (Ramsey County)
9. Todd Blomstrom (City of Arden Hills alternate)
10. David Yang (City of Shoreview)
11. Bernard Walker (City of St. Anthony Village)

**Community RAB Members Present**

1. Paul Bloom
2. Marie Culhane
3. Sean Dobie
4. Tim Donakowski
5. Sara Frantz
6. Bobby Goldman
7. Niall Johnson
8. Keith Maile
9. Kristine Poelzer
10. Lyle Salmela

**Army and Army Contractors Present**

1. Cathy Kropp (USAEC)
2. Robert Reine (USAEC)
3. Clayton M Dayoc (Matt) (USAEC)
4. Susan Elrod (USAEC)
5. Thomas A Lineer (DCS G9)
6. Paul F Muething (OTJAG)
7. Kay Toye (ERG)
8. Voscott, Hoa (Arcadis)
9. Tim Molitor (Arcadis)
10. Joel Janssen (Spec Pro Services)

**Visitors**

1. Gretchin Needham (City of Arden Hills)
2. Sarena Selbo (USFWS alternate)
3. Liz Harper (DNR alternate)
4. Jeff & Jacqueline Hed
5. Andy Haas