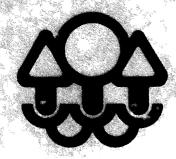
MINNESOTA POLLUTION CONTROL AGENCY

520 Lafayette Road St. Paul, Minnecota 55155

Minnesota Pollution Control Agency's Report on the Use of the Environmental Response Compensation and Compliance Fund During Fiscal Year 1987

November 1987



Minnesota Pollution Control Agency

November 13, 1987

The Honorable Glen Anderson Chair, House Appropriations Committee 365 State Office Building St. Paul, Minnesota 55155

The Honorable Gene Merriam Chair, Senate Finance Committee 122 Capitol St. Paul, Minnesota 55155

The Honorable Darby Nelson Chair, Legislative Commission on Waste Management Room 85 State Office Building St. Paul, Minnesota 55155

Dear Chairpersons:

It is my pleasure to present to you the Minnesota Pollution Control Agency's (MPCA) report on the use of the Environmental Response, Compensation and Compliance Fund (Fund) during Fiscal Year 1987. This report fulfills the requirements of Minn. Stat. § 115B.20, Subd. 6 and Minnesota Laws 1985, 1st Special Session, Chapter 13, 26 Subd. 4(a). Although the main focus of this report is a summary of expenditures during Fiscal Year 1987, it also provides a brief summary of accomplishments under the Superfund Program.

Fund dollars are expended for the investigation and clean up of sites contaminated with hazardous substances, as in the case of the 250 arsenic sites. Fund dollars are also used for preliminary staff efforts and for the State's cost-sharing obligation at sites where federal dollars can be secured for site investigation and cleanup, as in the case of the Oak Grove Site. Finally, the availability of Fund dollars has greatly enhanced the ability of the MPCA to secure commitments from responsible parties to undertake investigations and cleanups.

Sincerely,

Muleur Roberts

Thomas J. Kalitowski

Countissioner

Phone:

Minnesota Pollution Control Agency's Report on the Use of the Environmental Response Compensation and Compliance Fund During Fiscal Year 1987

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INTRODUCTION

The Minnesota Environmental Response and Liability Act (MERLA) of 1983 established the Environmental Response, Compensation and Compliance Fund (Fund) and authorized the Minnesota Pollution Control Agency (MPCA) to spend Fund dollars to investigate and clean up releases of hazardous substances. In accordance with MERLA, the MPCA's response to a release of hazardous substances is to:

- 1) request responsible parties to take the response actions necessary;
- 2) determine whether or not the actions requested by the agency will be taken by any known responsible party in the manner and within the time requested;
- 3) determine whether Federal Superfund dollars are available for response actions at a particular site; and
- 4) expend Fund dollars for response actions at a site if responsible parties do not respond and Federal Superfund dollars are not available.

MERLA also provides that the MPCA may use the Fund to respond immediately to an emergency, such as a contaminated drinking water supply or drum removal; investigate suspected releases of hazardous substances; pay for administrative and legal costs associated with site actions; and provide the 10% State share of federally funded remedial actions.

STATUS OF THE FUND

The MPCA has obligated \$5,162,536 during Fiscal Year (FY) 87 in its efforts to carry out the directives of MERLA. The status of the Fund as of June 30, 1987 is detailed in Table 1. The Fund balance at the end of FY 87 is \$4,410,218.

TABLE 1

GENERAL LEDGER BALANCE AS OF JUNE 30, 1987 ENVIRONMENTAL RESPONSE FUND #33 Original Transfer From General Funds \$5,000,000

Original Transfer From General Funds Appropriation	\$5,000,000
Income Interest on Investments Reimbursements to the Fund Hazardous Waste Taxes	\$2,039,548 \$3,501,062 \$3,857,399
Total Funds Available to date	\$14,398,009
Expenditures FY-84, FY-85, FY-86 FY-87 Obligated	(4,825,255) (5,162,536)
Fund Balance as of June 30, 1987	\$4,410,218

The Fund investments are managed by the Department of Finance and the Hazardous Waste Tax is collected by the Department of Revenue. The MPCA has recovered \$3,501,062 in the form of penalties and reimbursements from responsible parties since the Fund was established. The MPCA recovered \$1,799,732 of this total during FY 87. The amount recovered during FY 87 is much greater than in past years due to a \$695,000 reimbursement collected from the responsible parties at the Reilly Tar Site and the increased number of responsible parties reimbursing the Fund for MPCA expenses incurred at recently initiated as well as ongoing site cleanups.

A summary of Fund expenditures during FY 87 is presented in Table 2.

TABLE 2

FY87 STATE SUPERFUND EXPENDITURES BY NPCA

Administrative Costs	\$1,916,308
Legal Costs	\$ 219,680
Revenue Expense Transfer	\$ 265,540 \$ 38,959
Site Specific Contractual Costs	\$2,050,336
Outstanding Obligations	\$ 671,713
Tota1	\$5,162,536

The administrative cost represents salaries for 46 positions, as well as travel, equipment, and supply expenditures associated with responding to emergencies and implementing site cleanups. Nearly half of the administrative costs that are incurred by NPCA staff are expenditures that result in securing response action commitments from responsible parties. The legal cost represents the cost for services rendered by the State Attorney General's Office.

Laboratory costs are expenses paid to the Minnesota Department of Health Department for analytical services. The Revenue expense transfer represents the cost of administering the Department of Revenue's program for collecting the Hazardous Waste Tax. The remainder of the costs represent contractual expenditures for site-specific actions.

STATUS OF THE SUPERFUND PROGRAM

There are now 130 hazardous waste sites included on the Minnesota Permanent List of Priorities (alphabetized list and map attached). The major cleanup accomplishments of the Minnesota Superfund Program include 32 Remedial Actions (RA) that have been implemented or are presently underway, clean up of the 250 above ground arsenic sites, and MPCA response to 15 drinking-water emergencies.

RA Completed or Underway

Boise/Medtronic Boise/Onen Boise, Ranier Burlington Northern Ra11road DMR, Duxbury DMR, Orr Ecolotech, Mols. Ecolotech, St. Paul FMC, Fridley Faribault, MSP General Mills Hutchinson Technology Ironwood Sanitary

Landfill

Koppers Coke

Isanti Solvent Site

Drinking Water Emergencies

Kurt Manufacturing MCDA/FMC National Lead Nutting Truck Oakda le PCI Perham Arsenic Reflly Tar St. Regis 3M Chemolite 3M Kerrick Tonka/Woyke Wadena Arsenic Washington County Sanitary Spring Grove* Landfill West Duluth Industries

Adrian Askov Atwater Garfield* Isanti Solvent Sites* Lakeland Township* Lansing* LeHillier* Long Prairie New Brighton/Arden Hills Northern Township St. Anthony St. Paul Park* Waite Park

*Bottled drinking water was provided to affected homes, not to the entire comunity.

Whittaker

Response actions (including site investigation, selection of a remedy and RA) have been initiated at 83 sites. Response actions at 59 sites are being conducted by responsible parties. Fund dollars have been the primary funding source of response actions at 13 sites and Federal dollars have primarily been used for response actions at another 11 sites.

Federally Funded

Adrian Arrowhead Interlake Isanti Solvent Sites Kummer SLF/Northern Township LeH111fer Long Preirie New Brighton/Arden Hills/St. Anthony Oak Grove South Andover Union Screp

State Funded

Above Ground Arsenic Sites Actor Atteter Below Ground Arsenic Sites **Jack son** Lake land Lansing Nac61111s & 61bbs Perham Arsenic Site St. Paul Park ladena Arsenic Site Deluth Industries

Responsible Party Actions

During FY 87 the MPCA Board has, under the authority in MERLA, issued 13 Requests for Response Actions (RFRA) to responsible parties at the following sites: Electric Machinery, Trio Solvents, Askov (where 2 RFRAs were issued), TCAAP, White Bear Dump, Conoco, Mutting, Ashland Pine Co., Faribault Coal Gasification Plant, Tonka Main Plant, Louisville Sanitary Landfill, and Cooperative Plating. MPCA staff negotiated and the MPCA Board entered into five (5) Consent Orders (CO) with responsible parties during the year at the following sites: Reilly Tar, Anderson Windows, FMC, Tonka/Noyke, and Dakhue Sanitary Landfill. The RFRAs and COs specify the actions (site investigation, RA, reimbursements, and penalties), that are required of the responsible parties. In addition, MPCA staff performed oversight of actions taken by responsible parties with respect to the schedules and intent of 36 RFRAs and COs issued in previous years.

Since the passage of MERLA, responsible parties have committed in excess of \$100,000,000 to the cleanup of hazardous waste sites and have made reimbursements to the Fund of \$3,501,062 to cover costs incurred by the MPCA in administrating these site clean up activities.

Significant NPCA and Attorney General's staff effort was spent during FY 87 negotiating an agreement with the U.S. Army concerning response actions at the Twin Cities Army Ammunition Plant (TCAAP). The State Legislature appropriated 10.4 million dollars, 3.6 million of which was for litigation costs in the event that negotiations did not result in a commitment from the U.S. Army to undertake on and off-site response actions at TCAAP. Negotiations were successful and in July of 1987 the NPCA Board executed a, first of its kind in the nation, Federal Facility Agreement with the Army. Consequently, the 3.6 million dollars are now available for cleanup activities at other sites.

During FY 87, the MPCA and the Attorney General's Office were also involved in complicated and lengthy legal proceedings concerning response actions at the Isanti Solvent Sites. The lawsuit resulted in execution of a Consent Decree between MPCA and eleven (11) responsible parties.

MPCA staff have responded to 115 requests from industries and developers during FY 87 to investigate property for potential contamination before it is transfered to a new owner or developer. MPCA staff search their records for information pertaining to property in question, and provide assistance during investigation and cleanup at sites where contamination has been detected. The MPCA's assistance is not to be construed as an authorization for development of the site nor is it to be construed as an assumption of liability by the MPCA for any actions taken at the site.

Use of Federal Dollars

During FY 87 \$1,042,043 of Faderal monies was expended by the MPCA to conduct response actions. Table 3 details the MPCA's expenditure of Federal dollars during FY 87. The MPCA has continued to secure federal funds whenever possible to conduct response actions or oversee the response actions of the U.S. Environmental Protection Agency (EPA) at Minnesota sites listed on the National Priorities List (MPL). During FY 87 approximately \$4.6 million of Federal dollars was secured under Cooperative Agreements with EPA for response actions at 12 sites. The dollars are budgeted to be spent over the next two fiscal years.

Site	Amount Secured	Activity Planned
Adrian	\$467,792	Remedial Investigation/Feasibility Study (RI/FS)
Arrowhead Kumer SLF	78 ,714 355 ,920	Federal RI/FS and Predesign RI/FS
LaGrande SLF LeHillier	721 .120 65 .000	RI/FS Remedial Design (RD)
Long Prairie New Brighton	43 ,022 1 ,117 ,309	RI/FS RI/FS and Alternate Drinking Water Supply
Northern Township Oak Grove	298 ,158 482 ,983	Drinking Water System RI/FS
Reflly Tar	194,260 234,005	RP oversignt
Ritari Union Scrap	491,010	RI/FS RI/FS

Use of State Superfund

During FY 87 \$2,050,336 from the Fund was used by the MPCA for contractual expenditures to respond to releases of hazardous substances. Table 3 details FY 87 Fund contractual expenditures. The following is a summary of how Fund dollars were utilized for contractual expenditures during FY 87.

1. Arsenic Sites

Two hundred and fifty above ground sites contaminated with arsenic laden pesticides located primarily in agricultural northern and western Minnesota have been cleaned up. The hazardous waste was recovered, packaged, and transported to a permanent hazardous waste facility out-of-state. During FY 87 \$222,538 from the Fund was used in this effort.

2. West Duluth Industrial Site

The MPCA expended \$1,154,004 from the Fund to construct a vault on the bankrupt site to dispose of lead-contaminated soil. Material contaminated with polychlorinated biphenyl (PCB) was packaged and shipped for disposal out-of-state. This cleanup allowed for development of the site by Lake Superior Paper Products, Inc.

3. Emergencies Declared During FY 87

Four drinking water emergencies occurred during FY 87. Some residents of Lansing, Garfield, St. Paul Park, and Lakeland Township were issued drinking water advisories by the Minnesota Department of Health because their wells were found to be contaminated by hazardous substances. The MPCA Commissioner responded by issuing Declarations of Emergency and utilized Fund dollars to provide safe drinking water to affected residents and to conduct preliminary investigations of the contamination. In the case of Garfield, a potential responsible party provided safe drinking water to six affected residences. Preliminary investigations are on-going at these sites.

4. Abandoned Barrel Program

The MPCA expended \$80,000 from the Fund to respond to reports of 162 abandoned drums during FY 87. The MPCA found responsible parties to undertake disposal in 28 cases. In the other cases, the MPCA's contractor analyzed a drum's contents and then transported and disposed of it appropriately.

5. Advance Match

The State's 10% share of the cost of implementing remedial actions at federally fundable sites is not due until remedial actions actually begin. However, the EPA allows the MPCA to use "advance match" funds (i.e., expend State funds at a site listed on the NPL and therefore eligible for federal funding) during the early stages of a site cleanup and apply the expenditure toward the State's ultimate cost-sharing obligation (10%) for response actions at the site. The NPCA received advance match grants from EPA for the Kummer and Oak Grove Sanitary Landfills. The NPCA expended \$373,154.25 from the Fund for RI/FS at these sites during FY 87. The NPCA secured \$238,504 from EPA on June 29, 1987 as reimbursement for Fund dollars expended under the advance match

award. The drawdown will occur and the Fund will be reimbursed during early FY 88. The remainder will be applied toward the State's required 10% match for construction of remedial measures at the Oak Grove Site.

6. Atwater

A well will soon be constructed to replace one Atwater municipal well that was found to be contaminated. Fund dollars totaling \$75,582 were used during FY 87 to investigate contamination and restore lost drinking water capacity.

7. MacGillis and Gibbs Company Site

Since the site owners have filed for Chapter 11 bankruptcy, the MPCA used \$57,931 from the Fund to initiate an investigation into the soil and ground water contamination at the site. The investigation continues.

8. Jackson Municipal Well Field

The MPCA used \$14,559 from the Fund to conduct an investigation to choose a site for a new water supply well for the City of Jackson to replace the drinking water capacity lost due to the contamination found in some of Jackson's municipal wells. Jackson now has a new municipal well that supplies sufficent drinking water. The source of contamination to the old municipal wells has not been determined.

9. Askov

A drinking water emergency was declared in Askov during FY 84. The MPCA continued operation and maintenance of a carbon filtration system throughout FY 87 to treat the contaminated Askov municipal water supply.

10. Adrian

A drinking water emergency was declared at Adrian in January 1984. The MPCA reimbursed the City of Adrian for costs it incurred during FY 86 associated with the installation and operation of a temporary safe municipal drinking water supply.

11. Isanti Solvent Site

Residences affected by the contamination at the Isanti Solvent Site were provided bottle drinking water during FY 87.

FUTURE GOALS OF THE SUPERFUND PROGRAM

The MPCA will continue to identify hazardous waste sites, respond to emergencies, and initiate site investigations. The MPCA will continue to seek out and secure responsible party commitment to response actions. The MPCA will also continue to utilize federal and state dollars in those cases where responsible parties cannot be found or are unwilling or unable to conduct a site cleanup.

The 1987 Minnesota Legislature increased the Fund by \$10.4 million for use over the current biennium. The MPCA's projected usage of the Fund is detailed in Table 4. This table is a planning tool and is updated as needed. At State fundable sites, the MCPA will use the funds to conduct remedial investigations, feasibility studies, remedial designs, and construct remedial actions. At federally funded sites, the MPCA will use the funds to conduct preliminary investigations and provide the State's 10% share of the cost of remedial action construction. Based on the projections contained in Table 4, the MPCA anticipates \$2 million will be left in the Fund at the end of the biennium. It is important that sufficient reserves exist to accomplate emergencies and remedial action construction costs that are more costly than the MPCA anticipates they will be at this time. The Fund balance at the end of the biennium may therefore be less than currently projected.

Among the sites where State and/or Federal dollars must be utilized, the MPCA anticipates a slight shift of its resources away from projects that are in the early stages of response actions and that do not present an immediate threat to public health to put those resources into site cleanups that are in the design and construction stages. The implementation of remedial measures is the final and most costly stage of a site response action. Numerous cleanups are approaching this final stage. The level of staff effort required for contract adminstration and contractor oversight is much greater during the design and construction phase than in earlier phases of a cleanup because of the expense and complexity of ground water and soil remediation technology.

The MPCA also anticipates that requests from business and industry concerning property transfers will place a growing demand on MPCA resources. MPCA staff conduct file searches and provide assistance in site investigation and cleanup activities at the request of property owners, prospective buyers, or developers. The number of such requests is increasing dramatically. The MPCA has not charged a fee for this service as of yet.

CONCLUSION

The Minnesota Superfund Program has been very effective. Thirty-two cleanups have been completed or are underway, two-hundred and fifty arsenic contaminated sites have been cleaned up, and responses to fifteen drinking water emergencies have been successfully initiated.

The MPCA has been aggressive in its efforts to seek out responsible parties and secure Federal dollars to fund cleanup activities. Despite these efforts, the continued success of the Superfund program is dependent on the availability of Fund dollars to "drive" responsible parties, provide the State's required 10%

match for federally fundable cleanups, and conduct cleanups of sites not eligible for Federal funding (i.e., sites typically located in rural, less populated areas and not included on the MPL).

The need for the Superfund program will continue beyond the next biennium, and existing funding levels will not be sufficient to maintain the program into the future. Therefore, it is anticipated that in the future additional funding will be requested at both the State and Federal levels.

TABLE 3
CONTRACTUAL EXPENDITURES FY87

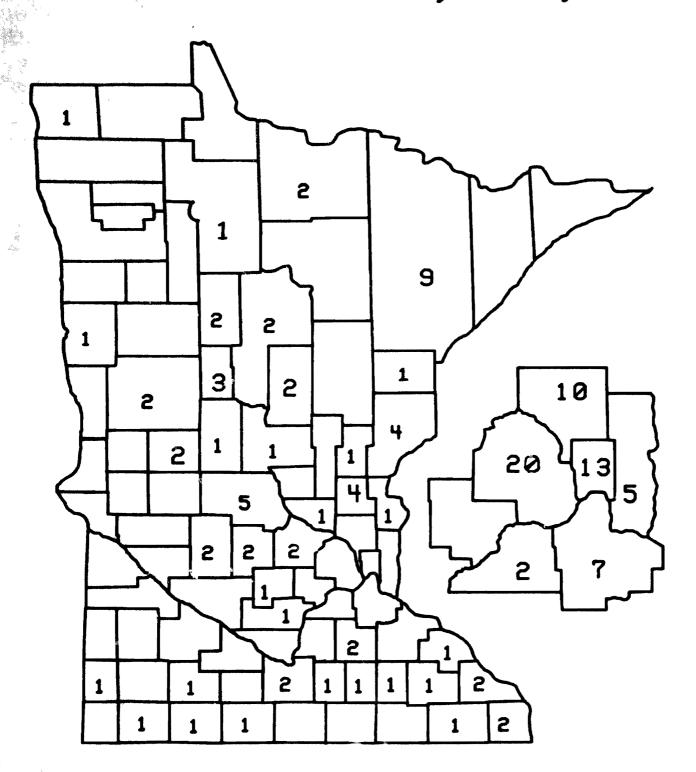
\$1te Name	Federal Dollars Expended	State Dollars Expended
Abandoned Barrel Program	\$	\$ 80,000
Adrian	\$ \$ 44,523 \$ 3,803	\$ 11,614
South Andover	\$ 3,803	\$
Arsenic	, 0,000	\$ 222,538
Askov		\$ 35,500
Atwater		\$ 75,582
Interlake	\$ 52,998	V /V 1005
Isanti	4 02,330	\$ 1,006
Jackson		\$ 14,559
Kumer	\$ 275,537	\$ 66,420
Lakeland	\$ 2/3 ₁ 33/	\$ 1,150
Lansing		\$ 13,877
LeHillier	e 1 014	3 13 , 0//
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Long Prairie	\$ 202,083	A 27 AG1
MacG1111s and G1bbs	A 007 FF1	\$ 57,931
New Brighton	\$ 335,551	
Oak Grove	\$ 37,427 \$ 82,450	\$ 306,734
Reilly Court Cost	\$ 82,450	\$ 326
St. Paul Park		\$ 9,075
Union Scrap	\$ 6,657	•
West Duluth Industries		\$1,154,004
TOTAL	\$1,042,043	\$2,050,336

		\$200,000	\$50°,000								\$100,000	
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Minnesota Permanent List of Priorities
Site Locations by County



Minnesota Environmental Response and Liability Act Permanent List of Priorities FY 1987

	Site Name/Location	MPL.	Score
	Adrian Municipel Well Field	X	34
	Agate Lake Scrap Yard	X	30
X	Anoka Municipal Sanitary Landfill		51
	Arrowhead Refinery Co.	X	40
	Ashland Oil Co Cottage Grove		34
	Ashland 011 Co Pine County	P	22 32
	Ashland 011/Park Penta/Sonford Products Site	•	32
	Askov Ground Water Contamination		18
	Atwater Municipal Well Field		31
	Bassett Creek/Irving Avenue Dump		10
	Battle Lake Area Sanitary Landfill		34
	Bell Lumber & Pole Co.	X	48
20.00	Boise Cascade/Meditronic	X	59
	Boise Cascade/Onan	X	59
	Boise Cascade Paint Waste Dump		17
	Buckers Sanitary Landfill	X	25 47
	Burlington Northern Burnsville Sanitary Landfill	^	47 43
	Chisago-Isanti County Sanitary		34
	Landf111		•
	Clay County Sanitary Landfill		17
	Conoco, Inc Wrenshall Refinery	P	41
	Crow Wing County Sanitary Landfill		14
	UMBIR Car and Locomotive Shops		11
105	DNR-Duxbury Pesticide Site	•	11
	Daking Sanitary Landfill	P	40
	Dodge County Sanitary Landfill Duluth Air Force Base		25 21
70,000	East Bethel Demolition Landfill	X	31
	East Mesaba Sanitary Landfill	^	14
	Ecolotech, Inc St. Paul		3
Ė,	Electric Machinery		38
	Electronic Industries, Inc.		26 25
568	Elk River Sanitary Landfill		25
	FNC Corp Fridley Plant	X	66
	Faribault Coal Gasification Plant Site		46
	Flying Cloud Senitary Landfill		40
	Ford-Twin Cities Assembly Plant Forty-Three East Water Street		9
	Freeway Sanitary Landfill	X	46
	Fritz Craig Salvage Operation	n	46 40 8 3 46 8 39
	General Hills	X	39
	Gofer Sanitary Landfill		26
	Greater Morrison Sanitary Landfill		10
354°			

Site Name/Location	MPL	Score
HMK Enterprises/Meeker Manufacturing/ Design Classics/Litchfield		24
Municipal Well Site		31
Hastings Former City Dump		31
Höneywell, Inc Golden Valley Plant Hopkins Agriculture Chemical/		31
Allied Chemical		3
Höpkins Sanitary Landfill		15
Houston County Sanitary Landfill		25
Hutchinson Technology, Inc.		9
Aronwood Sanitary Landfill		34
(Advance Transformer)		34
Isanti Martin		3
Isanti Rumpel		13
Isanti Solvent Site		30
Jackson Municipal Well Field		26
Joslyn Hfg. & Supply Co.	X	44
Kandiyohi County Sanitary Landfill	~	41
Karlstad Sanitary Landfill		10
Kluver Sanitary Landfill		39
Koch Refining/N-ReN Corp.	X	31
Koochiching Sanitary Landfill	••	27
Koppers Coke	X	55
Kummer Sanftary Landfill	X	42
Kurt Menufacturing	X	31
La Grande Sanitary Landfill	X	34
LeHf111er/Mankato	X	42
Long Prairie Ground Water	X	32
Contamination		-
Louisville Sanitary Landfill		29
MacGillis & Gibbs Co.	X	48
McGuire Wire Salvage Site		20
McLaughlin Gormley King Co. (MGK)		4
Menker County Sanitary Landfill		15
Metals Reduction		2 1
Minneapolis Community Development		1
Agency /FMC		
Minnegasco		42
ML Industries/Taracorp/Golden Auto	X	40
Northwest Refinery, Former		9
Northwoods Sanitary Landfill		18
Mutting Truck and Caster Co.	X	38
y Oak Grove Sanitary Landfill	X	43
Oakdale Dump	X	38 43 59 34
Olmsted County Sanitary Landfill	X	34
Owetonna City Dump		23

3	Site Name/Location	NPL	Score
1	PCI, Inc.		52
1	Perham Arsenic Site	X	38
ı	Pickett Sanitary Landfill		34
1	Pine Bend Sanitary Landfill/Crosby	X	52
	American Demolition Landfill		
	Pine Lane Sanitary Landfill		25
	Pipestone County Sanitary Landfill		27 2 25 59
	Polymetal Products, Inc.		2
	Ponderosa Sanitary Landfill		25
	Reilly Tar	X	
	Ritari Post and Pole	X	30
	St. Augusta Sanitary Landfill/Engen	X	34
	Dump		
	St. Louis River/Interlake/Duluth Tar	X	32
	St. Louis River/U.S. Steel	X	32
	St. Regis Paper	X	53
	Sauk Centre Sanitary Landfill		38
	Schnitzer Iron & Metal Co.		10
	Shafer Metal Recycling		41
	Sibley County Sanitary Landfill		38
•	South Andover	X	35
	Spring Grove Municipal Well Field		28
	Superior Plating, Inc.		6
	3M Chemolite Disposal Site		33
	3M Kerrick Disposal Site		9
	Tonka Main Plant		31
	Tonka/Noyke Site		9
	Trio Solvent Site	••	21
	Twin Cities Air Force Reserve Base	X	34
•	Twin Cities Army Ammunition Plant/	X	59
	New Brighton/Arden Hills/St. Anthony		
_	Site	•	
	U of M-Rosemount Research Center	X	46
l	U.S. Naval Industrial Reserve	P	63
_	Ordnance Plant (NIROP)		
	Union Scrap Iron and Metal Co.	X	43
	Mabasha County Sanitary Landfill		22
	Madena Arsenic Site		25
	Madena Sanitary Landfill		25
1	Waite Park Ground Water Contamination	X	32
	Site		
	Maseca County Sanitary Landfill		13
	Washington County Landfill	X	42
	Waste Disposal Engineering	X	51
	Neisman Scrap		25
1	West Duluth Industrial Site		11

Western Lake Superior Sanitary District Landfill/Dulyth Dump		29
White Bear Township Dump		31
Whittaker Corporation	X	40
Window Dump	X	38
Winona County Sanitary Landfill		34
Woodlake Sanitary Landfill		16
Yonak Sanitary Landfill		28