Introduction

Beginning in 1940, Northern Pump designed and made advanced naval weapons at the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund site in Fridley, Minnesota. The facility played an important role during World War II by supplying the U.S. Navy (Navy) with weapons and equipment. After the war, weapons design and manufacturing continued on parts of the site. These activities contaminated site groundwater, surface water and soil. The Navy worked with EPA and the Minnesota Pollution Control Agency (MPCA) to ensure the safe commercial and industrial use of the areas, during and after cleanup.

Superfund site restoration and reuse can revitalize local economies with jobs, new businesses, tax revenues and local spending. Cleanup may also take place while active land uses remain on site. Today, the site supports commercial and industrial reuses while institutional controls safeguard the community and ensure that businesses continue to operate safely on site. This case study explores the cleanup and reuse of the NIROP Superfund site, illustrating the beneficial effects of Superfund redevelopment.

Beneficial Effects

Site businesses employ about 1,366 people, providing estimated annual employment income of over $112 million and generating over $501 million in annual sales revenue.

Site properties are currently valued at over $83 million and generate about $2 million in annual property tax revenues.

Collaboration among site stakeholders and a willingness to take on voluntary cleanup actions resulted in expedited cleanup and redevelopment.

Figure 1. The site’s location in Fridley, Anoka County, Minnesota.
Site History

The site occupies about 83 acres in Fridley, Anoka County, Minnesota. The site is located south of Interstate 694 and east of Interstate 94 and the Mississippi River. Industrial and commercial areas surround the site to the north, east and south. The Mississippi River is located west of the site. A railway is east of the site. The FMC Corp. Superfund site is located immediately south of the site. According to the U.S. Census, about 28,000 people live in Fridley.

Beginning in 1940, the NIROP facility was constructed by the Northern Pump Company, and operated by Northern Ordnance, Inc. under contract to the Navy to produce naval weaponry and equipment. NIROP was later operated by FMC Corporation. The plant was partially owned by the government and partially by the Northern Pump Company. In 2004, the Navy sold the NIROP property to United Defense Limited Partnership (UDLP). In 2005, UDLP sold the property to ELT Minneapolis LLC. ELT Minneapolis LLC owned the former NIROP property and leased the space to the UDLP until 2013, at which time ELT Minneapolis LLC sold the property to Fridley Land LLC, the current landowner. In the early 1970s, operators began to dispose of paint sludge and solvents in pits and trenches on part of the site called the North 40 area. The former plating shops were later identified as an additional source area. Improper waste disposal practices led to groundwater, surface water and soil contamination.

State of Minnesota and EPA Involvement

In 1980, MPCA staff received information regarding past disposal practices at the site. MPCA ordered operators to conduct initial investigations to determine the extent of contamination. These investigations found volatile organic compounds (VOCs), primarily trichloroethene (TCE), in site soil, groundwater and nearby surface water. During investigations, several emergency response actions removed contaminated drums and some site soil. Forty-three excavated drums and 1,200 cubic yards of underlying contaminated soil were disposed of at an off-site EPA-approved landfill in 1983 and 1984. EPA listed the site on the Superfund program’s National Priorities List (NPL) in November 1989.

Site Cleanup

To manage the cleanup, EPA divided the site into three operable units (OUs). OU1 addressed contaminated groundwater. OU2 addressed most contaminated soil, except for soil under the former plating shop. OU3 addressed that soil. EPA selected a cleanup plan to address OU1 contamination in the site’s September 1990 Record of Decision (ROD). The remedy included a groundwater pump-and-treat system to remove VOCs, with treated water discharged to the sanitary sewer system and the Mississippi River. The Navy began operating the
system in June 1991 and it remains active today. Operation and maintenance activities for the remedy, including groundwater monitoring, are also ongoing.

EPA selected a cleanup plan to address OU2 and OU3 in a September 2003 ROD. In addition, the Federal Facilities Agreement (FFA), a legal agreement that guides the site cleanup, was signed by the Navy, EPA, and MPCA in March 1991. The remedy called for institutional controls to restrict some land uses and to prohibit the disturbance of soil at certain site locations. The Navy recorded these controls in a deed restriction, which is still enforced today.

Additional remedial investigations were conducted by the Navy through 2015 and additional cleanup conducted in 2016 showed that the soil in OU2 and OU3 do not pose a risk human health or the environment. EPA deleted OU2 from the NPL in 2014 and deleted OU3 from the NPL in 2018.

**Redevelopment Efforts**

In June 2004, the Navy sold the site buildings and property to UDLP, which in turn sold the site property to another company, ELT Minneapolis LLC, in June 2005. The Navy remained in charge of cleanup efforts at the site. In November 2005, ELT Minneapolis LLC began leasing the buildings to BAE as a defense weapons manufacturing facility. Apart from BAE’s use of portions of the site buildings, remaining areas of the site sat idle with no reuse plans in place. Soil contamination remained below the former plating shops and cleanup actions were ongoing. These areas were well-located and well-suited for new industrial and commercial development. However, they remained unusable so long as contamination remained in place at concentrations above levels acceptable for industrial and commercial uses.

In 2012, Paul Hyde of Hyde Development, a development company in Minneapolis, began to consider opportunities for productively reusing the vacant areas of the site. The company had expertise redeveloping several other Superfund sites in Minnesota, including the Joslyn Manufacturing & Supply Company and Boise Cascade/Onan Corporation/Medtronic Inc. sites. As a first step, Hyde Development contacted EPA about potential redevelopment opportunities at the site. For redevelopment to be possible, EPA made it clear that remaining site areas would need to be cleaned up to commercial and industrial use standards.

“We quantify the uncertainty, understand the risk and then address the risk.”

*Paul Hyde*

**Redevelopment Coordination**

In 2013, EPA, MPCA and the Navy worked to redefine the site’s three OUs to separate out the soil under the former plating shop in OU3. The Navy no longer owned the property associated with NIROP but was still in charge of cleanup at the site. NIROP was also a federal facility, a site formerly used by a federal government agency. Another priority for redevelopment was expediting cleanup actions to allow for commercial and industrial reuse. Hyde Development outlined a vision for the redevelopment of the site as a modern industrial park. Hyde Development, EPA and MPCA worked together on identifying the parties’ environmental cleanup and redevelopment responsibilities.

Through this collaboration, Hyde Development enrolled the site in MPCA’s Voluntary Investigation and Cleanup (VIC) program. The program provides a clear path for prospective purchasers, developers and other parties to implement cleanup activities under MPCA oversight. For Hyde Development, the program complemented federal
and state Superfund program cleanup activities, providing a way to implement needed cleanup actions more quickly. MPCA programs were well-suited to provide oversight of soil cleanup and coordinate with private sector-led voluntary cleanup. Under this program, testing showed that OU3 soil may need additional cleanup and that the Navy needed to implement and enforce OU3 institutional controls. On the state side, MPCA emphasized deleting as many site OUs from the NPL as possible. Recognizing that additional cleanup actions, such as excavating and treating contaminated soil in OU3, could help achieve the deletion goal, MPCA agreed to support remaining cleanup under the Superfund program with close collaboration with the VIC program. EPA, MPCA and Navy would continue to monitor the groundwater, OU1. Original plans called for redeveloping the site areas over a 10-year period. Thanks to the expedited cleanup, redevelopment finished in six years.

The Navy retained responsibility for the remaining OU3 soil contamination below the former plating shop. Hyde Development hoped to redevelop the area but could not do so with contamination remaining in place. Institutional controls prevented the area’s excavation without EPA and MPCA approval, and the amount of contaminated soil below the concrete was unknown. To address the issue, the developer discussed the benefits of addressing the contamination with the Navy, EPA and MPCA. By addressing the contamination at the source, the Navy could accelerate groundwater remediation, saving time and money while completely addressing remaining OU3 cleanup. Following the discussions, the Navy agreed to fund the excavation and cleanup of the contamination. The Navy developed cleanup plans for OU3 with EPA and MPCA approval. The plans consisted of excavating and treating contaminated soil beneath the plating shops to protective industrial and commercial levels. Parties initially were concerned about the potential amount of soil to be excavated, however the final amount ended up being a quarter of cleanup estimates. The Navy had fulfilled its cleanup obligations for site soil. EPA signed an ESD for OU3 in 2017, removing the institutional control. OU3 was delisted in 2018.

Cleanup Actions and Redevelopment Construction

Hyde Development began designing the redevelopment project before the selection of VIC program cleanup plans. Starting in 2012, the redevelopment team designed a four-phase project for both the NIROP Superfund site and the south adjoining land, slated to be finished over 10 years. In July 2013, Hyde Development purchased 122-acres, with the northern 83-acres consisting of the NIROP Superfund site. In early 2014, Hyde Development completed its redevelopment planning and named the area Northern Stacks Industrial Park (Northern Stacks), inspired by two former NIROP smokestacks remaining on site. The project’s four phases included construction of two bulk distribution and office warehouse buildings (Phase I), BAE renovations (Phase II) which included demolishing the southern two-thirds of the main plant building, construction of three more office warehouse buildings (Phase III), and construction of two bulk distribution and office warehouse buildings (Phase IV).
Redevelopment of the site also prompted the Navy, EPA and MPCA to optimize the existing groundwater monitoring network, leading to the abandonment of 35 monitoring wells by the end of 2019. The Navy is also redesigning its treatment system; a more efficient, lower-cost system will be in place in 2020.

Hyde Development began redevelopment of areas not affected by voluntary cleanup actions in July 2014. Thanks to regular and sustained coordination with EPA, MPCA and the Navy, Hyde Development completed construction of all phases of the redevelopment in the fall of 2019, four years ahead of schedule.

**Reuse and Federal Award**

Beginning in November 2005, BAE leased the former Navy buildings at the site for defense weapons manufacturing. After a scaling back of the wars in Afghanistan and Iraq, demand for these weapons decreased significantly. In response, many defense contractors, including BAE, started consolidating their operations. BAE consolidated its Fridley plant with its St. Louis plant; only its engineering team remained on site. As a result, BAE no longer needed to lease all of the former Navy buildings. With lease renewal coming up, BAE considered relocating its engineering team. After detailed planning and coordination with Hyde Development, BAE decided to retain its on-site operations. In turn, this allowed Hyde Development to showcase continued use on site for prospective tenants interested in locating their operations at Northern Stacks.

The new lease agreement stated that BAE would operate out of about one-third the space it had previously occupied, at a rate agreeable to both parties. Hyde Development agreed to renovate BAE’s space to optimize its operations, while enabling BAE to continue to operate during the renovation. Finally, as part of additional cleanup actions under the VIC program, all remaining unused former Navy buildings would be demolished to make space for new development.

In October 2019, EPA presented regional awards to the Navy, MPCA and Hyde Development for their efforts supporting the beneficial reuse of the site. EPA congratulated the recipients for their innovation, initiative and vision in making the Northern Stacks a reality and helping to foster economic growth in the area. The award...
ceremony took place on site at Forgotten Star Brewing, the former boiler room for NIROP. The brewery opened to the public in November 2019.

Today, redevelopment has resulted in 122 acres of vibrant industrial and commercial space at this once-polluted site. Over a dozen businesses – entertainment service providers, automobile accessory manufacturers, a brewery, etc. – currently operate at Northern Stacks, with plans for more businesses to locate at the facility in the future. Hyde Development works diligently to “right size” Northern Stacks buildings for prospective businesses, maximizing their usage.

**Beneficial Effects**

Today, the NIROP Superfund site supports the bustling Northern Stacks industrial campus. The selected remedy and cleanup actions protect human health and the environment while also enabling new industrial and commercial development. Businesses at Northern Stacks are already providing economic benefits thanks to the development finishing ahead of schedule in November 2019. This section describes the beneficial effects of some of the current commercial and industrial reuses at the site.

**Axalta**

This global-coatings business, headquartered in Philadelphia, has over 150 years of experience. Its on-site location focuses on research and development work for its industrial wood coatings business and warehousing and coatings production. Axalta also engages in environmental stewardship through a multi-year partnership with wetland restoration nonprofit Ducks Unlimited and supports STEM education by providing financial support for new equipment at the Science Leadership Academy. Jobs at this Axalta branch contribute $2.5 million in estimated annual employment income to the community.

**British Aerospace Engineering (BAE)**

Headquartered in Arlington, Virginia, BAE provides support for a wide range of defense and military systems, designs and manufactures electronic systems for military and commercial applications, and produces specialized security and protection products. Its on-site branch specializes in research and development for search detection and navigation instruments. BAE also supports the community by partnering with local and national organizations, including a partnership with the National Math & Science Initiative through which BAE has contributed more than $2.7 million in funding to improve STEM education in public schools. BAE’s on-site branch has contributed $66 million in estimated annual employment income and generated over $115 million in sales revenue in 2019.
Dero Bike Racks (Dero)

This bike rack construction company provides a variety of bike racks as well as repair stations. Dero also fulfills custom orders, maintains a free CAD library on its website and provides consultations on bike parking needs. Its facility on site makes bike racks. The company is committed to popularizing bicycles as a sustainable transportation alternative, hosting free webinars on its website, and supporting local and national bicycle advocacy organizations. Jobs at its on-site location contribute over $340,000 in estimated annual employment income to the community. In 2019, sales revenue for the business reached $2.4 million.

Forgotten Star Brewing

This brewery opened at Northern Stacks in November 2019. In addition to its tap room, Forgotten Star Brewing hosts food trucks and events such as a small business shopping market and exercise classes. It also supports area charities, including the ALS Association. Forgotten Star Brewing will generate nearly $480,000 in annual estimated employment income.

LKQ Corporation

This global business provides alternative and specialty parts to repair and accessorize automobiles and other vehicles. The business is headquartered in Chicago and has over 1,700 operating locations and 52,000 employees providing customers with replacement systems, components, equipment and parts for automobiles worldwide. This LKQ location has contributed nearly $3.5 million in estimated annual employment income and generated over $73 million in sales revenue in 2019.

Thyssenkrupp

Headquartered in Essen, Germany, this business is an international manufacturer and provider of elevator equipment and services. Its on-site branch makes and installs elevators and escalators, provides service and repair for all brands of elevator equipment, and offers maintenance assistance and modernization options for existing elevators. Thyssenkrupp is also a member of ecosense, an association of German businesses specializing in sustainable development. This Thyssenkrupp location has contributed nearly $3.3 million in estimated annual employment income and generated about $5 million in sales revenue in 2019.
VStar Entertainment

This location-based entertainment company caters to families and kids, providing custom tours that feature original content and licensed, branded tours that provide entertainment for fans of all ages. The company has presented more than 39,000 live performances across 40 countries. Past performances include musicals, performance art and hands-on exhibits. Its on-site location hosts the company’s headquarters and production facility. VStar Entertainment has contributed $2 million in estimated annual employment income and generated over $13 million in sales revenue in 2019.

Figure 17. VStar Entertainment’s on-site headquarters.

Figure 18. Aerial view of the site and highlighted businesses.
Property Values and Tax Revenues

On-site properties help generate property tax revenues that support local government and public services. Today, site properties have a combined value of over $83 million. In 2019, site properties generated about $2 million in total property tax revenues. On-site businesses also generate tax revenues through the collection of sales taxes, which support state and local governments.¹

Conclusion

Collaboration and cooperation among EPA, MPCA, the Navy and Hyde Development was vital to the successful and expedited cleanup and beneficial reuse of the NIROP Superfund site. The carefully designed and coordinated cleanup protects public health and the environment and enabled extensive redevelopment. Enhancements to strengthen the site's remedy are planned for the future, with the Navy scheduled to construct a more efficient groundwater treatment system in 2020. The site now supports about 1,366 jobs and its reuse has expanded Fridley's tax base, with more businesses slated to open at Northern Stacks in the near future. Site businesses collectively generate over $501 million in annual sales revenue and over $112 million in estimated annual employment income. In addition, property taxes generated by on site properties help fund public services in the community. These efforts and outcomes can help inform and guide the cleanup and reuse of other Superfund sites across the nation.

For more information about EPA’s Superfund Redevelopment Initiative, visit: https://www.epa.gov/superfund-redevelopment-initiative.

¹ The combined sales tax rate in Anoka County is 7.125 percent. This combined rate includes sales tax rates for the state, county and city. For more information, see https://www.revenue.state.mn.us/sales-tax-rate-calculator.
Technical Appendix

Employment Information for On-Site Jobs
EPA obtained the data in this appendix directly from reputable sources and reported the data as presented by those sources. Information on the number of employees and sales volume for on-site businesses came from the Hoovers/Dun & Bradstreet (D&B) database.1 D&B maintains a database of over 300 million businesses worldwide. When Hoovers/D&B database research was unable to identify employment and sales volume for on-site businesses, EPA used the ReferenceUSA database.2 In cases where ReferenceUSA did not include employment and sales volume for on-site businesses, EPA used the Manta database.3 These databases include data reported by businesses. Accordingly, some reported values might be underestimates or overestimates. In some instances, business and employment information came from discussions with the site developer. While sales values typically exceed estimated totals of annual income, sales can sometimes be lower than estimated income. This could be attributed to a number of business conditions and/or data reporting.

Wage and Income Information for On-Site Jobs
EPA obtained wage and income information from the U.S. Bureau of Labor Statistics (BLS). Part of the U.S. Department of Labor, the BLS is the principal federal agency responsible for measuring labor market activity, working conditions and price changes in the economy. All BLS data meet high standards of accuracy, statistical quality and impartiality.

EPA used the BLS Quarterly Census of Employment and Wages database to obtain average weekly wage data for businesses at the Naval Industrial Reserve Ordnance Plant Superfund site. Average weekly wage data were identified by matching the North American Industry Classification System (NAICS) codes for each type of business with weekly wage data for corresponding businesses in Anoka County. If weekly wage data were not available at the county level, EPA sought wage data by state or national level, respectively. In cases where wage data were not available for the six-digit NAICS code, EPA used higher-level (less-detailed) NAICS codes to obtain the wage data.

To determine the annual wages (mean annual) earned from jobs generated by each of the selected businesses at the Naval Industrial Reserve Ordnance Plant Superfund site, EPA multiplied the average weekly wage figure by the number of weeks in a year (52) and by the number of jobs (employees) for each business.

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1 http://www.dnb.com
2 https://referencesolutions.data-axle.com/
3 https://www.manta.com/
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\( ^a \) NAICS code provided in the D&B database, unless otherwise noted.

\( ^b \) Employee number is an estimate provided by Hyde Development to EPA during a 2019 site visit.

\( ^c \) Average weekly wage per employee based on BLS 2019 Average Weekly Wage data.

\( ^d \) Total annual employee income figures derived by multiplying “Number of Employees” by “Annual Wage (Mean Annual) per Employee”.

\( ^e \) Sales are from the D&B database, unless otherwise noted.

\( ^f \) While sales values typically exceed estimated totals of annual employee income, annual reported sales can sometimes be lower than estimated annual income. This atypical condition of estimated income exceeding sales can be a result of business conditions, estimated business wages not accurately reflecting actual wages for the site-specific business, annual sales being under-reported, a business loss for the year or a combination of these factors.

\( ^g \) Annual sales value calculated using the “Sales Per Employee” method. In cases where information sources do not provide annual sales data, an estimated annual sales value was calculated using the “Sales Per Employee Method”. This method involves dividing the company-wide sales value by the number of employees that work at all branches of the business. That value equals an estimated business sales value per employee for the entire company. That value is then multiplied by the number of employees at the on-site business location to calculate an estimated annual sales value for the site-specific business location.

\( ^h \) NAICS code assumed based on business type.

\( ^i \) Annual sales value calculated using the “Sales Per Employee” method using number of employee estimate provided by Hyde Development and company wide sales and employees self-reported by the business at https://www.heraeus.com/en/group/about_heraeus/about_heraeus_at_a_glance/about_heraeus.html. Euro to dollar conversion rate of 1.18 on September 8th 2020 was used.

\( ^j \) Data are from the ReferenceUSA database.

\( ^k \) Data are from the Manta database.

NA = not available.
Property Values and Local Tax Revenue Generated from Property Taxes
EPA obtained data on the most recently assessed values for property parcels at the Naval Industrial Reserve Ordnance Plant Superfund site in November 2019 through property records accessible through Anoka County’s online property appraisal database. EPA also obtained 2019 property tax information for the site parcels.

Table A-2. Property Value and Tax Summary for Taxes Payable in 2019

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