



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HE-12

28 FEB 1985

Mr. A. E. Rhoads, Head  
Environmental Protection Section  
Attention: Code 1142  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
Philadelphia, Pennsylvania 19112

Re: FMC Corporation Site, Fridley, Minnesota  
[Naval Industrial Reserve Ordnance Plant (NIROP)]

Dear Mr. Rhoads:

This is in reply to your January 28, 1985 letter to Mr. Richard Bartelt of this Agency. Briefly, our responses to the two major points of your letter are: 1) upgradient off-site wells are necessary to conduct an adequate investigation of the NIROP facility, and 2) the entire response resulting from contamination from the NIROP facility should be conducted by the Department of Defense (DOD). The requirement for upgradient wells is standard in these types of investigations not only to provide background data against which other data is compared but also to adequately define the hydrogeology of the area of the site. The obligation of DOD to conduct and finance the response action at the NIROP facility is based on item 3.1.b. of the Memorandum of Understanding (MOU) between DOD and this Agency signed on August 12, 1983, as the NIROP facility is the source of contamination that has moved off-site. Based on discussions with the Minnesota Pollution Control Agency (MPCA), the area to the north of the NIROP facility was apparently an airstrip and shows no historical indication of being used for disposal of wastes. The other sources of contamination at the FMC Site, the FMC and Burlington Northern Railroad lands to the south, and downgradient, of the NIROP facility are being addressed separately.

Further, per the MOU, the procedures used for the response action must be in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP). Since the responsibility for selecting the solution has not been delegated, this Agency must select the response action before implementation can begin. To assure that the basis of that selection is adequate, this Agency's and the MPCA's input into the remedial investigation/feasibility study (RI/FS) process (i.e., the data collection and planning) is vital. Although a continuing dialogue is desirable, at least three specific points of input are considered necessary:

1. Review and approval of the RI workplan, or sampling plan.
2. Preparation, review and approval of the final RI report.
3. Preparation, review and approval of the final FS report, in which the recommended alternative is delineated, along with a range of other possible alternatives.

If you have any questions, please contact Mr. Kerry Street, the Remedial Project Manager, at 312/886-4752.

Sincerely,

  
Norman R. Niedergang, Chief  
CERCLA Enforcement Section

cc: David Richfield, MPCA  
David Smith, Navy