



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND

200 STOVALL STREET

ALEXANDRIA, VA 22332-2300

IN REPLY REFER TO

March 12, 1991

Jerome Kujawa
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection
Agency, Region V
230 S. Dearborn St.
Chicago, IL 60604

Re: FFA for NIROP Fridley, MN

Dear Jerry:

It is my understanding that the Project Managers have agreed to the enclosed Deadlines section for the Federal Facility Agreement (FFA) for the Naval Industrial Reserve Ordnance Plant (NIROP) Fridley, Minnesota. In addition to the Deadlines section, the Project Managers have agreed to the following changes in EPA Region V's sixth draft FFA for NIROP Fridley:

In paragraph 14.3(d) (page 32), replace "Initial Screening" with "Preliminary Analysis" and insert "(e) Alternatives Report" and re-letter the remaining sub-paragraphs accordingly.

Delete paragraph 14.4(1)(c) (page 33) and re-letter the remaining sub-paragraphs accordingly.

In paragraph 14.7(2) (page 35) in the second line, replace "forty-five (45)" with "thirty (30)".

In paragraph 14.7(2) (page 36) in the fourth and sixth line from the bottom of the paragraph, replace "forty-five (45)" with "thirty (30)".

In paragraph 14.7(5) (page 37) in the seventh line, replace "sixty (60)" with "forty-five (45)".

In addition, I have talked with Steve Shakman and he does not have any objection to deleting the Executive Order as Attachment F (page iii of the Table of Contents).

Because I will be out of the office all of next week, I would like to finalize as much as possible this week. Next week, if you need to talk with the Navy regarding this matter, please contact Kenneth Homick at (215) 897-6105 or Peter Kushner at (703) 602-2252.

Page 2

Please feel free to contact me to discuss this matter further, if necessary. I appreciate your cooperation in this matter and look forward to hearing from you.

Sincerely yours,



RAY GOLDSTEIN
Assistant Counsel (Environmental)

Enclosure

cc: S. Shakman
R. Hanson
J. Shafer
K. Homick
N. Pryor
D. Olson
P. Kushner
G. Davidson (w/o enclosures)

SAMPLING AND ANALYSIS PLAN

SECTION XXXII

DEADLINES AND TARGET DATES

A. The U.S. Navy shall complete and transmit to the U.S. EPA and the MPCA drafts for the following primary documents in accordance with the deadlines set forth below:

Primary Documents

Deadlines

- | | |
|---|--|
| 1. Evaluation Report | Submitted |
| 2. RI/FS Work Plan, including QAPP, and Site Health and Safety Plan (assumes 1 round of analyses) | Oct. 1. 1991 |
| 3. RI Report, including Risk Assessment, Preliminary Analysis of Alternatives | 365 days from Final RI/FS Work Plan |
| 4. Alternatives Report | 90 days from Final RI Report |
| 5. FS Report with Detailed Analysis of Alternatives | 90 days from Final Alternatives Report |
| 6. Proposed Plan | 60 days from Final FS Report |
| 7. Record of Decision, includes Responsiveness Summary | 90 days from end of Comment Period |

B. Within 21 Days from the Final ROD the U.S. Navy shall propose deadlines to the U.S. EPA and MPCA for completion of the following draft RD/RA primary documents:

1. Remedial Design (including Site Security & Health and Safety Plan)
2. Remedial Action Work Plan
3. Response Action Final Report

Within 15 days of receipt, U.S. EPA and the MPCA shall review and provide comments to the U.S. Navy regarding the proposed deadlines. Within 15 days following receipt of the comments the U.S Navy shall, as appropriate make revisions and reissue the proposal. The parties shall meet as necessary to discuss and finalize the propose deadlines. If the Parties agree on proposed deadlines, the finalized deadlines shall be incorporated into the appropriate Work Plans. If the Parties fail to agree within 30 days on the proposed deadlines, the matter shall immediately be submitted for dispute resolution pursuant to Section XV, "Resolution of Dispute."

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C. The U.S. Navy shall complete and transmit to the U.S. EPA and MPCA drafts for the following secondary documents in accordance with the target dates set forth below:

<u>Secondary Documents</u>	<u>Target Dates</u>
1. Surface Water Investigation Plan (not previously in RI schedule)	As needed
2. Sampling and Data Results	60 days after samples collected
3. Treatability Studies (not previously in FS schedule)	As needed
4. Responsiveness Summary to Proposed Plan	Submitted with ROD
5. Community Relations Plan (May be amended as appropriate to address current issues)	Submitted with RI Report

D. Within 21 days from the Final ROD the U.S. Navy shall propose target dates to the U.S. EPA and MPCA for completion of the following draft RD/RA secondary documents.

1. RD/RA Site Security and Health and Safety Plan
2. Remedial Design Phase Documents 30%, 60% & 90%

E. The deadlines set forth in this Section may be extended pursuant to Section XXXIII, "Extensions", of this Agreement. The Parties recognize that one possible basis for extension of deadlines relating to RI and FS is the identification of significant new Site conditions during the performance of the RI.