

# Minnesota Pollution Control Agency

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

July 20, 1994

Mr. Sidney L. Allison, P.E., Director  
Environmental Department  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Site

Dear Mr. Allison:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the U.S. Navy's (Navy) letter of June 24, 1994, concerning use of presumptive remedy concept for the soil operable unit for the Naval Industrial Reserve Ordnance Plant (NIROP) site. This letter from the Navy was sent pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the Navy.

The MPCA staff hereby approves the use of the presumptive remedy concept for the Soils Operable Unit (Operable Unit 2) with the following conditions.

1. The Navy shall complete any and all outstanding investigations previously required by the MPCA staff prior to implementation of the presumptive remedy concept at the NIROP site. For example, in an MPCA staff letter to the Navy approving the Soils Operable Unit Remedial Investigation, dated June 25, 1993, the MPCA staff required the Navy to conduct additional investigation of site for the possible presence of additional buried barrels. The MPCA staff believes that this work has not been done.
2. As the MPCA staff indicated at the last Technical Review Committee meeting, the Navy shall investigate the impact of a layer of silty clay in the soil profile of the site on the distribution of contaminants. The Navy shall determine the feasibility of the use of soil vacuum extraction for Operable Unit 2 if this silty clay layer contains contaminants of concern.

Mr. Sidney L. Allison

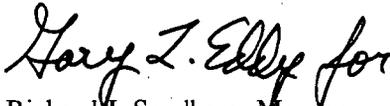
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3. As has been discussed with the Navy on several occasions, the MPCA staff requires the investigation of soil volatile organic compound contamination and the possible presence of dense nonaqueous phase liquid source material under buildings at the NIROP site. This work shall be known as Operable Unit 3 and shall be conducted by the Navy at a yet undetermined future date.
4. The MPCA staff believes that the operation of the soil vacuum extraction system being operated by United Defense as mentioned in the letter may or may not be an indicator of the success of this technology for Operable Unit 2 as geologic conditions vary from those in Area C and the Operable Unit 2 area of contamination is much more extensive.

If you have any questions regarding this letter, please contact David Douglas of my staff at (612) 296-7818.

Sincerely,



Richard J. Sandberg, Manager  
Site Response Section  
Ground Water and Solid Waste Division

RS:ch

cc: David Cabiness, Navy, Southern Division  
Linda Hicken, RMT, Inc.  
Thomas Bloom, U.S. Environmental Protection Agency, Region V