



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 3 1994

Commanding Officer
Dave Cabiness/Code 1869
SOUTHNAVFACENCOM
P.O. Box 190010
North Charleston, South Carolina 29419-9010

HSRM-6J

RE: Review of the Workplan for Improvement of Groundwater Containment System Effectiveness for the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, July 1994

Dear Mr. Cabiness:

The U.S. Environmental Protection Agency (U.S. EPA) has completed the review of the Workplan for Improvement of Groundwater Containment System Effectiveness for the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, July 1994. U.S. EPA understands that this document is required because one objective of the current extraction well system is to hydraulically contain contamination emanating from NIROP. The existing extraction well system is not meeting the objective. U.S. EPA hopes that the proposed extraction system upgrade detailed in this workplan will meet the hydraulic containment objective. U.S. EPA comments on the Workplan for Improvement of Groundwater Containment System Effectiveness for the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, July 1994, are as follows:

1. Figure 2-7: particle #8 is within the capture zone, it should be colored red.
2. Figure 3-3: particle #5 is not within the capture zone, it should be colored blue.
3. Page 16, 1st paragraph, last sentence: The capture zone also does not extend into the northwestern corner of the site..., please reword this statement. The way the sentence is worded the reader may misinterpret the statement to mean that there is an off-site migration of contamination extending out from the northwestern corner of the site.
4. Page 17, 1st paragraph, 2nd sentence: Flow rates at the wells are decreasing due to, U.S. EPA notes that in several sections of the Workplan the U.S. Navy refers to decreasing flow rates. U.S. EPA feels that the upgrade to the system should address problems regarding extraction well flow rates as well as the addition of extraction wells. If

installation of additional extraction wells adversely effects the system because of backpressure buildup, the upgrade may not be considered effective.

5. Page 18, last paragraph: U.S. EPA again notes that along with the addition of recovery wells, 100% of plume capture will occur by increasing existing recovery well rates.
6. Page 40: river elevations are not recorded. Please provide this data.
7. Page 43: the scheduled draft workplan meeting is incorrect; the date agreed on at the TRC meeting was July 28, 1994.
8. Appendix A: the north arrow on figures A-6 and A-7 are pointing south, please correct their orientation.
9. Appendix C: please include the pitless adaptor diagram which is referenced.

For any questions regarding the review of the Workplan for Improvement of Groundwater Containment System Effectiveness for the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, July 1994, please contact me at (312) 886-1967.

Sincerely,



Thomas Bloom
Remedial Project Manager

cc: Tinka Hyde, U.S. EPA
Dave Douglas, MPCA