

November 30, 1994

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Mr. Thomas Bloom, HSRM-6J
U.S. EPA - Region V
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RE: Responses to MPCA's October 3, 1994, Comments on the Draft AAD for
NIROP - Fridley, Minnesota

Dear David and Tom:

Attached are two copies of the Alternatives Array Document for your review and approval. Responses to comments contained in MPCA's October 3, 1994, letter to Mr. David Cabiness have been incorporated into this document. The following are the individual responses to MPCA's comments.

Comment 1: Section 2.3, Summary of the Soil OU RI Results

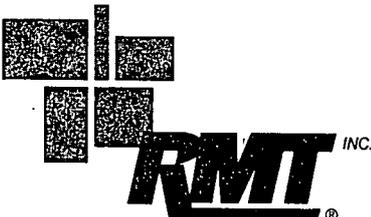
Paragraphs 4 and 5 on Page 5 now will read, "A shallow zone (approximately 3 to 7 feet below ground surface) of highly variable fine-grained soil underlies much of Area A3 and the west-central part of Area A4. Figure 2 shows the location of this fine-grained layer.

VOCs represent the most significant type of chemical contamination associated with the areas where the fine-grained layer exists. Based on analytical results collected during the soils RI, it appears that no significant or consistent vertical trends in the VOC concentrations are associated with the fine-grained soil. In general, similar concentrations were detected in shallow soils (0 to 5 feet deep) located within and above the fine-grained soil interval and in the deep soils (13 to 20 feet deep) beneath the fine-grained interval. Table 1 shows the vertical extent of contamination in borings advanced through the fine-grained layer. The effectiveness of the selected remediation technology for removing contaminants from this fine-grained material will be addressed in the FS."

Comment 2: Section 3, Remedial Action Objectives

In an October 20, 1994, letter to MPCA and USEPA-Region 5, RMT outlined the results of their Risk Assessment Clean-Up Goals for metals, pesticides, PCBs, non-PAH semivolatiles, and PAHs. None of the NIROP RI soil samples contained pesticides, PCBs, or non-PAH semivolatiles above the risk-based cleanup goals. Therefore, no remediation is needed for these groups of compounds. The results indicate that PAHs in OU #2 soils can be attributed to typical construction materials such as asphalt and road tar or from particulate redeposition from the incomplete combustion of fossil fuels. The PAHs are not related to disposal activities specific to the NIROP or to a particular spill or released

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caused by on-site operations. Comparing the site specific metals data obtained during the Remedial Investigation with the calculated Risk Assessment Clean-Up Goals indicates that remediation of soils for metals is not warranted based on the sparse occurrence of soil samples that exceeded the calculated clean-up levels and the lack of consistent evidence of site-specific impacts. The AAD will not be changed to address either metals or PAHs; however, the results of RMT's Risk Assessment Clean-Up Goals for metals and PAHs will be presented in the Feasibility Study.

Comment 3: Section 4.1, Introduction

The first paragraph on Page 14 has been changed and now reads, "This section presents the potential ARARs identified for the Soils Operable Unit 2 (OU2) at the NIROP Fridley facility. Contaminated soils and potential DNAPLs under the buildings at NIROP are separated into Operable Unit 3 (OU3) and are not addressed in this AAD. Chemical-specific, action-specific, and location-specific ARARs are primarily identified for both federal and state interpretation. Potential federal ARARs are discussed first, followed by a discussion of potential state ARARs."

Comment 4: Section 4.3, State ARARs

Tables 1 and 2 have been combined into a single table for Applicable or Relevant and Appropriate Requirements (ARARs) and a second table has been prepared for "To Be Considered" items. In addition, all references to RALs and the Summers soil leaching model have been deleted from the AAD.

Comment 5: Section 5.2.1, Site-Specific Considerations, Groundwater Quality

The Navy, under a separate task, is presently preparing to investigate the presence of unexcavated magnetic anomalies to determine if they are a possible source of VOC contamination to OU2 soils. If items such as buried drums are discovered during the investigation, they will be removed. Contaminated soils surrounding the buried anomalies will remain in-place for treatment by the selected remedy. The presence of unexcavated anomalies will not effect selection of the soil remedial alternative, and therefore, investigation and removal of the buried anomalies will not be addressed in this AAD.

Comment 6: Section 5.2.2, Soil Conditions

The last paragraph on Page 22 has been changed and now reads, "Although soil in the unsaturated zone predominantly consists of poorly and well-graded sands, there are some areas of finer-grained silts and clays. This fine-grained soil does not release constituents to the groundwater in the same manner as the sandy soil. However, in spite of the heterogeneity of the soils, a single numeric clean-up goal will be proposed in the Feasibility Study for OU2 soils at NIROP."

Mr. David Douglas
Mr. Thomas Bloom
November 30, 1994
Page 3

Comment 7: Section 6.2.1, No-Action Alternative, Description

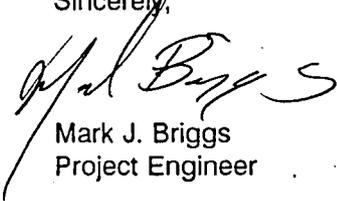
The last sentence on Page 25 has been rewritten and now reads, "This alternative consists of no remedial activities in conjunction with periodic monitoring of VOC concentrations in OU2 soils."

Comment 8: Table 2

All references to RALs have been removed from the table.

Dave and Tom, if you have any questions regarding our responses to your comments, please give me a call at 414-798-9550.

Sincerely,



Mark J. Briggs
Project Engineer

cmk

Enclosures