

January 6, 1995

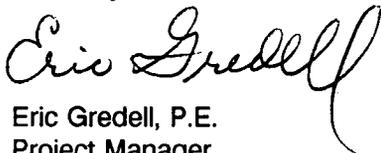
Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn: David Cabiness; Code 1869
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Naval Industrial Reserve Ordnance Plant
Fridley, Minnesota
Contract No. N62467-94-C-0984
RMT Project No. 2826.03

Dear David:

Enclosed, for your use, are two copies of the notes from Technical Review Committee meeting #23 held at the Naval Industrial Reserve Ordnance Plant on November 17, 1994. These final notes address review comments on draft notes provided to RMT by the Navy. Other copies of these notes have been distributed according to the attached Distribution List.

Sincerely,



Eric Gredell, P.E.
Project Manager

jlg

Attachment



RMT, INC. — MADISON, WI
744 HEARTLAND TRAIL — 53717-1934
P.O. Box 8923 — 53708-8923
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TRC MEETING #23**

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Chicago, IL 60606 1

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn: David Cabiness; Code 1869
P.O. Box 190010
North Charleston, SC 29419-9010 2

**Minutes of Meeting
Technical Review Committee Meeting #23
November 17, 1994**

**Naval Industrial Reserve Ordnance Plant
Fridley, Minnesota**

Technical Review Committee (TRC) meeting #23 was held at the Naval Industrial Reserve Ordnance Plant (NIROP) in Fridley, Minnesota, on November 17, 1994. A copy of the agenda distributed at the meeting and an attendance list are attached.

A. Introductions

1. David Cabiness opened the meeting.
2. Some comments on the notes issued for TRC meeting #22 have been sent from David Douglas to David Cabiness by FAX.

B. Actions Since Last TRC Meeting

1. A telephone conference call was held recently with representatives of the USEPA, MPCA, Navy, and RMT, to discuss cleanup levels for soil under Operable Unit (O.U.) #2. The results of the risk assessment prepared for soil and the results of the MPCA's soil leaching model were among the topics discussed.
2. Galen Kenoyer said that RMT has prepared and sent to the MPCA and USEPA calculations of the estimated mass of trichloroethene (TCE) present in the unsaturated soil, based on the results of the soil Remedial Investigation (RI). This included estimates of the location of the center of TCE mass, which is used in calculating soil cleanup goals. He said that agreement was not reached regarding the biodegradation rate value used by the MPCA in their leaching model. The MPCA now prefers using the most conservative value reported in technical literature. RMT prefers use of a value representing the mid-point of reported degradation rate values. The cleanup goals calculated by RMT from the leaching model are above concentrations that exist in the unsaturated soil at the site, which indicates that the soil would not need remediation in order to be protective of groundwater. However, Galen Kenoyer said that regardless of the disagreement concerning the biodegradation rate value, the risk assessment results would lead to the same conclusion regarding the optimum remedial technology, i.e., that soil vapor extraction (SVE) is likely to be most effective in achieving cleanup levels for soil. He said the allowable concentration values for soil determined by the MPCA soil leaching model are criteria to-be-considered (TBC) under the Superfund program. He said it should be possible to apply a best available technology (BAT)-type evaluation to support the selection of SVE as the preferred technology under the USEPA's presumptive remedy strategy.

Galen Kenoyer said that the risk assessment considers contaminants contained both within the soil matrix and in the soil pore gas. The risk assessment showed that for the NIROP site, the risk "driver" is exposure to soil pore gas by inhalation. The volatile organic compounds (VOCs) TCE and tetrachloroethene (PCE) were found to be the key risk compounds. The allowable concentrations in soil pore gas to meet risk-based standards were 0.3 ppm TCE and 0.7 ppm PCE. Metals in the NIROP soil were

detected in most soil samples, at concentrations near background levels. It was concluded that metal concentrations were not related to site activities. It was also concluded that PAH concentrations that occur in near-surface soil samples were likely to be related to asphalt parking lot construction rather than any on-site disposal activities, as discussed in the soils operable unit Remedial Investigation Report. Therefore, metals and PAHs are not included in the risk assessment, and no cleanup goals are proposed for these constituents.

2. Tom Bloom said a BAT evaluation would be likely to result in selection of SVE as the optimum technology. He said that if a SVE system was installed and if it was found after some time that the target cleanup concentrations could not be reached due to the technical limitations of the method, the Navy could apply to establish Alternate Concentration Limits that were achievable with a properly operating SVE system at the site.
3. Mark Ferrey said that soil cleanup levels must be determined and approved before a remedy for the soil is selected. He said the USEPA, MPCA, and Navy are making progress toward determining the cleanup levels.
4. David Douglas said the MPCA Air Quality Division will consider use of incineration if it is proposed as the remedial method for soil at Superfund sites. A remedial action contract for incineration of soil from a Superfund site in Minnesota was recently issued for bids. However, no bids were received. He said if incineration was selected as the remedial method for the NIROP soil, a test burn would be required. The MPCA would have to waive the Minnesota regulations to allow a test burn. The state currently has an incineration ban that applies to soil contaminated by chlorinated VOCs. The ban does not apply to soil contaminated by non-chlorinated organic compounds.
5. David Cabiness said an application for a Groundwater Appropriation Permit for the two proposed extraction wells will be sent to the Minnesota DNR.
6. Comments on the text portion of the Operation and Maintenance (O&M) Manual were sent to the Navy by Tom Bloom. David Cabiness will issue a revision of the text that addresses these comments to all persons possessing the O&M Manual by December 1.
7. David Cabiness said that negotiation of the stipulated penalties is continuing among the Navy, the USEPA, and the MPCA. Tom Bloom said the deadline to reach a resolution of the penalties through informal negotiation has been extended to December 9. If resolution is not reached by that date, formal negotiations will begin.

C. Actions for Next Quarter

1. An addendum to the Annual Monitoring Report for 1993 will be issued, to address comments on the report received from the USEPA and MPCA.
2. Mark Ferrey will prepare a summary of the recent telephone conference call discussing the approach for determining soil cleanup levels. The summary will be sent to all conference call participants, with a request for comments or clarifications.

Mark Ferrey will re-calculate the cleanup concentrations using the MPCA soil leaching model, based on the discussions during the conference call. The revised results will be sent to the Navy and RMT.

3. The Draft Feasibility Study (FS) Report for soil (O.U. #2) will be issued within approximately 30 days. The Federal Facility Agreement (FFA) allows 90 days after approval of the final Alternatives Report for submittal of the Draft FS Report.
4. The Alternatives Report for soil (O.U. #2) will be issued in final form within three weeks.
5. The Remedial Action Workplan - Revision 3 is expected to be issued.
6. The Community Relations Plan - Revision 1 is expected to be issued.
7. The design documents for upgrading of the groundwater extraction system are expected to be issued.
8. David Cabiness said that the concentrations of all contaminants in the groundwater flow entering the air stripping unit have been below the concentration limits required for discharge to the sanitary sewer for several weeks. At the present concentrations, pretreatment of the groundwater prior to discharge to the sewer is not required. An additional sample of the combined flow from all four wells entering the air stripping unit will be collected in November, with the other required samples from the four individual extraction wells. If the laboratory results for these samples also show that concentrations are below the discharge limits without treatment, the Navy will proceed with a request to the Metropolitan Council Wastewater Services to shut down the pretreatment system and discharge the groundwater directly from the wells to the sewer.
9. The Annual Monitoring Report for 1994 for the groundwater remediation system is to be submitted to the USEPA and MPCA by January 31, 1995.
10. David Cabiness said the Navy intends to perform investigations of soil characteristics beneath the floor in the plating shop area while access to the soil is available during the ongoing renovations of the plating shop. The Navy is performing this work on its own initiative; the soil investigation does not indicate the beginning of work under O.U. #3.

Steve Hoffman said the Navy has a window of opportunity to begin investigating soil quality under the plant floors. However, he said any sampling or other investigations must be planned and conducted to avoid any impacts to manufacturing operations. The current window in which to do sampling should last from 6 to 12 months. Renovation of the east plating room is scheduled to occur from February 1995 until approximately February 1996. Additional work is scheduled that will involve opening up the floors in the foundry area. This may also present some opportunities for preliminary soil investigations in that area. Halliburton NUS will handle the soil investigation work in the in-plant areas.

11. Tom Bloom said that the initial step under O.U. #3 should be a thorough search for pertinent existing data and records regarding past plant activities that may have contributed to contamination of soil or groundwater. He said that any investigation of

soil performed by the Navy during the plating shop renovation should be done under a QAPP, SAP, or some other type of planning document approved by the USEPA and MPCA. He said this should be done so the USEPA and MPCA can give "credit" to the Navy for the work done as part of O.U. #3, when that O.U. begins.

John Betcher said it would be possible to reference the existing approved QAPP for O.U. #2, and issue an addendum to the QAPP for the plating area work. The addendum could include revised laboratory methods, if appropriate.

12. Mark Ferrey said the previous soil sampling and analysis for the east plating shop done by United Defense did not follow an approved QAPP. He said the MPCA cannot accept this data as part of a future O.U. #3 because a QAPP and proper quality control procedures were not followed. He said this should be noted when planning any future sampling and analysis work.
13. David Cabiness said the Navy will discuss arrangements for performing further investigations for buried drums in the north 40 with the USEPA and MPCA. He said the investigations will be done in response to concerns raised by the MPCA regarding areas with potential undiscovered buried drums as indicated by magnetic anomalies from previous investigations, that were not adequately addressed in the soil RI for O.U. #2, which has been approved by the MPCA. Additional excavations will be performed by the Navy to search for possible buried drums in the north 40. He said Morrison-Knudsen will make a site visit on November 18 to begin planning for the excavation work.
14. David Cabiness said that by November 18, the Navy will decide the contracting arrangements to be used for completing the design of certain items for the groundwater extraction system upgrade that are not being addressed in RMT's scope of design. The schedule is for this additional design work to begin by November 28.
15. Kerry Morrow said the schedule for construction of the groundwater extraction system upgrade is to start site work on about March 15, 1995, with all construction completed by June 15. This schedule assumes that United Defense will do the construction, and that these contract arrangements with United Defense will be allowed under the Federal Acquisition Regulations.
16. Tim Ruda said that shutting down the pretreatment system and discharging groundwater directly to the sanitary sewer should result in an increase in flow rate from all extraction wells. He said United Defense is still evaluating optional procedures to determine scheduling for change-out of the activated carbon.

D. RCRA Status

No topics were discussed.

E. Community Relations

1. The Navy issued public notices in the Fridley Focus on October 28 and November 4, announcing formation of the Restoration Advisory Board (RAB) for the NIROP site. No inquiries from the public in response to these notices have been received to date.

The RAB will be initially convened at the next meeting at the NIROP. The agenda for RAB meetings will initially be the same as TRC meetings. Minutes of RAB meetings will be published in the Fridley Focus, or possibly published as part of the Fridley public records. RAB meetings will be conducted as public meetings. The Defense Plant Representative Office (DPRO) facilities will be opened to the public, and arrangements for easy public access through plant security will be made. The Navy will continue to gauge public interest in the environmental activities at the NIROP, and will make adjustments to the RAB program and procedures over time as appropriate.

2. The documents in the public information repository have all been indexed. Some organization of the documents is continuing. The repository will remain at the United Defense office unless and until a preferable location is identified. The Navy will issue a public notice announcing that the information repository is now located at the United Defense office. This will also be noted in the forthcoming revision of the Community Relations Plan.
3. Caroline Voelkers said the MPCA is preparing responses to comments received during the public comment period for the draft NPDES permit. The MPCA received 15 letters during the comment period. Most of the comments were related to the issue of conservation of water. However, she said the MPCA does not have authority to require use of treated groundwater to address this issue.

The formal 30-day comment period has officially been closed. However, the MPCA usually allows an informal extension of the period to receive late comments. She said some persons notified the MPCA that they did not receive requested copies of the draft permit with sufficient remaining time to submit comments during the 30-day period. The MPCA currently is expecting to receive only one additional comment submittal. She said that based on the comments received, the MPCA does not intend to make any revisions to the draft permit.

She said the MPCA is still evaluating whether a public meeting should be held. They expect to make this decision by about December 15, with a meeting held in early January if the decision is to hold a meeting. There are two options for the meeting format: a public informational meeting, or a public hearing. A legitimate technical basis is needed to contest a permit to justify the option of a public hearing. The MPCA believes this justification does not exist in this case. If a meeting is held, it is expected that an informational format will be used.

Kerry Morrow said the Navy needs adequate advance notice if a public meeting is to be held. Caroline Voelkers said notices are typically provided three weeks prior to a meeting.

Caroline Voelkers said the MPCA expects that the final permit will eventually be issued. The MPCA does not have the authority under the NPDES program to withhold the final permit based on issues raised to this point by the public. However, issues raised by the public will be resolved to the extent possible before the final permit is issued.

4. A sign-up form for persons interested in volunteering to serve on the RAB was made available at the meeting (copy attached).
5. A handout describing the purpose, responsibilities, and functions of the RAB was distributed at the meeting (contact Kerry Morrow at 612-572-6360 for copies).

F. General Topics

1. Of the three presumptive remedies being evaluated for the soil under O.U. #2 (SVE, incineration, and thermal desorption), soil incineration and thermal desorption are not commonly used in Minnesota due to potential air contamination from these methods. Incineration is occasionally used for soil from excavated "hot spots," and waivers from Minnesota air quality rules can be obtained in these instances. However, either of these thermal treatment methods cannot be used when the soil contaminants include chlorinated VOCs, as is the case at the NIROP.
2. A draft Progress Report for the period from September 9 to November 17, 1994, was provided to the MPCA and USEPA by the Navy at the meeting. Similar Progress Reports will be provided at all subsequent meetings, for information.
3. David Douglas said that contaminated soil that was stockpiled for on-site treatment on the Burlington Northern Railroad (BNR) property adjacent to the northeast corner of the NIROP property was from another BNR facility called the Northtown Yard, and possibly other BNR sites. In response to concerns raised by the Navy, BNR has moved the soil stockpile away from the NIROP fence. The MPCA has notified the BNR in writing that they are required to develop a Management Plan for soil that remains stockpiled for greater than 60 days. The BNR is currently preparing a Management Plan for the soil stockpiled near the NIROP. The MPCA will require a higher level of oversight of the soil storage and treatment operations if the soil is stored longer than 60 days. He said the MPCA believes the soil in the existing stockpile is contaminated only with PAHs, although they are not sure about this. The BNR has hired a contractor to process the soil through a mobile incinerator unit that is operated near the stockpile. The MPCA rules regarding management of stockpiled soil are applied on a site-by-site basis.
4. Michael Flaherty said that in July 1994, the Metropolitan Wastewater Control Commission (MWCC) was consolidated with the Metropolitan Transportation Commission and the Regional Transit Commission. All three organizations were combined under the Metropolitan Council, which is a planning agency serving the 7-county metro area. The MWCC is now known as the Metropolitan Council Wastewater Services (MCWS). The responsibilities of the MWCC have been broadened under the MCWS to include overall water resources issues in the 7-county area. However, none of the changes should affect the ongoing environmental activities at the NIROP. The MCWS has not made any decisions at this time regarding a possible increase in sewer use charges.
5. John Flora said it is still necessary to deal with the issue of water conservation at the NIROP. He said that although there have been many discussions among the interested parties regarding the issue of providing treated groundwater to the city, and positions of the parties are known, none of this has been shared in writing. He said there are still no written plans defining the specific actions the Navy would be willing to take toward the objective of providing the water to the city. He said the Navy should pay all costs involved in providing the groundwater to the city with VOC concentrations that are suitable for use as drinking water. The city would provide subsequent treatment for chlorination and fluoridation.

David Cabiness said the Navy does not have the authority to install equipment to provide the additional level of treatment needed to supply the groundwater to the city

at drinking water quality and at the pressure requirements at the tie-in point to the city water main. Steve Hoffman said these are statutory requirements imposed on the Navy, not Navy policy. Kerry Morrow said the main issue to be resolved is the cost for the city to install 1,600 feet of piping from the location of a groundwater treatment facility to Fridley Well #13. He said the city has apparently retreated from previous statements made regarding resolution of this issue.

Tom Bloom said he believes it would be helpful for the Navy and the city to prepare a written description of their position on the issue. David Douglas concurred with this approach. He said the issue will probably eventually involve legal input; therefore, it would be helpful to begin preparing written position descriptions. He suggested that the Navy should prepare a draft agreement that would be provided to the city to begin negotiations.

6. David Douglas said that comments provided on TRC meeting notes should not be used as a vehicle for negotiation of issues. He said that written comments on the notes should pertain only to the accuracy of statements made during the meetings, as shown in the notes. Comments made by persons as recorded in the meeting notes often represent the opinion of the commenter, and should not be construed as statements of official policy, position, etc. He requested that a distinction be made between items where agreement of all meeting attendees is reached and comments of individuals in all future meeting notes.
7. Michael Flaherty requested a copy of a drawing(s) from previous reports showing the extent of the VOC plume and the location of the two new extraction wells. The Navy (via RMT) will provide this information.
8. An update on the status of design for the upgrading of the groundwater extraction system was presented by Eric Gredell.
9. Kerry Morrow said there will be another GAO audit at the NIROP in January 1995. The scope of the audit will be expanded to include environmental issues. The purpose of the audit is to reconcile all costs expended from the Defense Environmental Restoration Account for work at the NIROP. The Navy will send a copy of the preliminary report from the last GAO audit to the MPCA and USEPA, for their information.
10. The next meeting, which will be a RAB meeting, will be held on **Thursday, March 23, 1995, at 10:00 a.m.** in the Defense Plant Representative Office (DPRO) at the NIROP Fridley. Subsequent RAB meetings will be held on a quarterly basis.

NIROP FRIDLEY TRC MTG #23
NOVEMBER 17, 1994
AGENDA

1. Introduction
2. Corrections to Minutes of TRC #22
3. Actions since last meeting.

Navy/RMT

- Restoration Advisory Board(RAB) formation brief.
- Annual Monitoring Report for 1993 Addendum
- Groundwater Extraction System(GWES) Upgrade workplan(RAWP) final submission.
- GWES upgrade design
- Alternatives report for soil submission
- Soil Feasibility for OU#2
- Risk based Cleanup Goals
- Soil Leaching Model resolution
- O&M Plan and Manual for Groundwater Extraction System
- Request to MPCA and USEPA for formal approval of sampling and sampling analysis modifications. (Revision #3 of the RAWP)
- Hydraulic evaluation of existing GWES by RMT.
- Community Relations Plan(CRP) Revision #1
- Enforcement action status.
- Soil Feasibility Study for OU #2.

United Defense

- Maintenance & Monitoring Activities
- Contract to install 2 wells/flowrate optimization
- Information Repository setup
- Quarterly Progress Report issued to Navy

- Special Discharge Report issued to MCWS

MPCA

- NPDES Permit Status
- Burlington Northern Stockpiled soil resolution

MWCC

- Reorganization and name change

4. Actions scheduled for next six months

- Groundwater Appropriation Permit
- Formation of Restoration Advisory Board
- NPDES Permit Issuance
- Preliminary Design of the new Groundwater Treatment Facility (GWTF)
- Upgrade of GWES to include addition of 2 wells and improvement of flowrates from existing wells.
- Working toward completion of GWTF design
- Completion of Soil Feasibility study
- Annual Monitoring Report for 1994

5. Other issues/comments

6. Next Meeting

TECHNICAL REVIEW COMMITTEE (TRC) MEETING # 23

NOVEMBER 17, 1994

NIROP FRIDLEY, MINNESOTA

LIST OF ATTENDEES

PLEASE SIGN IN!

<u>NAME</u>	<u>ORGANIZATION</u>	
Margaret Casserly	Black and Veatch	_____
Scott Erickson	City of Fridley	_____
John Flora	City of Fridley	<i>[Signature]</i>
Robert Hutchinson	County of Anoka	_____
Evan Drivas	DNR	_____
John Dresch	DPRO United Defense Minneapolis	_____
Keith Lura	DPRO United Defense Minneapolis	<i>[Signature]</i>
Sue Oetterer	DPRO United Defense Minneapolis	_____
CDR Stephenson	DPRO United Defense Minneapolis	<i>[Signature]</i>
Richard Ninesteel	Halliberten Nus	<i>[Signature]</i>
James de Lambert	Liesch Associates Inc.	_____
Bruce Rehwaldt	Liesch Associates Inc.	_____
Larry Cole	Minneapolis Water Works	_____
Paul Koski	Minneapolis Water Works	_____
John Betcher	MPCA	<i>[Signature]</i> (present)
Dave Douglas	MPCA	<i>[Signature]</i>
Gary Eddy	MPCA	_____
Mark Ferrey	MPCA	<i>[Signature]</i>
Fred Jenness	MPCA	_____
Carolyn Volker	MPCA	<i>[Signature]</i>

NAME

ORGANIZATION

Michael Flaherty

MWEE NEWS

Michael Flaherty

Charles Smith

Naval Weapons Station

NAVSEA

Steve Hoffman

NAVSEA

(was present)

Kerry Morrow

NAVSEATECHREP Office

Pat Mosites

REICC, Minneapolis

Mark Briggs

RMT, Inc.

Eric Gredell

RMT, Inc.

Linda Hicken

RMT, Inc.

Galen Kenoyer

RMT, Inc.

Charles Black

SOUTHNAVFACENCOM

Steve Beverly

SOUTHNAVFACENCOM

David Cabiness

SOUTHNAVFACENCOM

Douglas Hildre

United Defense

Timothy Ruda

United Defense

Thomas Bloom

USEPA

(present)

**COMMUNITY INTEREST FORM FOR
NIROP FRIDLEY RESTORATION ADVISORY BOARD**

Conditions for Membership:

Restoration Advisory Board (RAB) members are volunteering to serve a term and attend all RAB meetings. Duties and responsibilities will include reviewing and commenting on technical documents and activities associated with the Installation Restoration at NIROP Fridley. Technical experts will be made available to the RAB. Members will be expected to be available to community members and groups to facilitate the exchange of information and/or concerns between the community and the RAB. RAB community members can expect to devote approximately 50 hours per year to support the RAB.

Priority for RAB membership will be given to local residents that are impacted/affected by the NIROP Fridley.

Name: _____

Address: _____
 Street Apt# City State Zip

Phone: () _____ () _____ () _____
 Daytime Home Fax

1. Are you affiliated with any group related to restoration or base closure activities? If yes, list the group and your position, if available.

2. Briefly state why you would like to participate on the RAB.

3. What has been your experience working as a member of a diverse group with common goals?

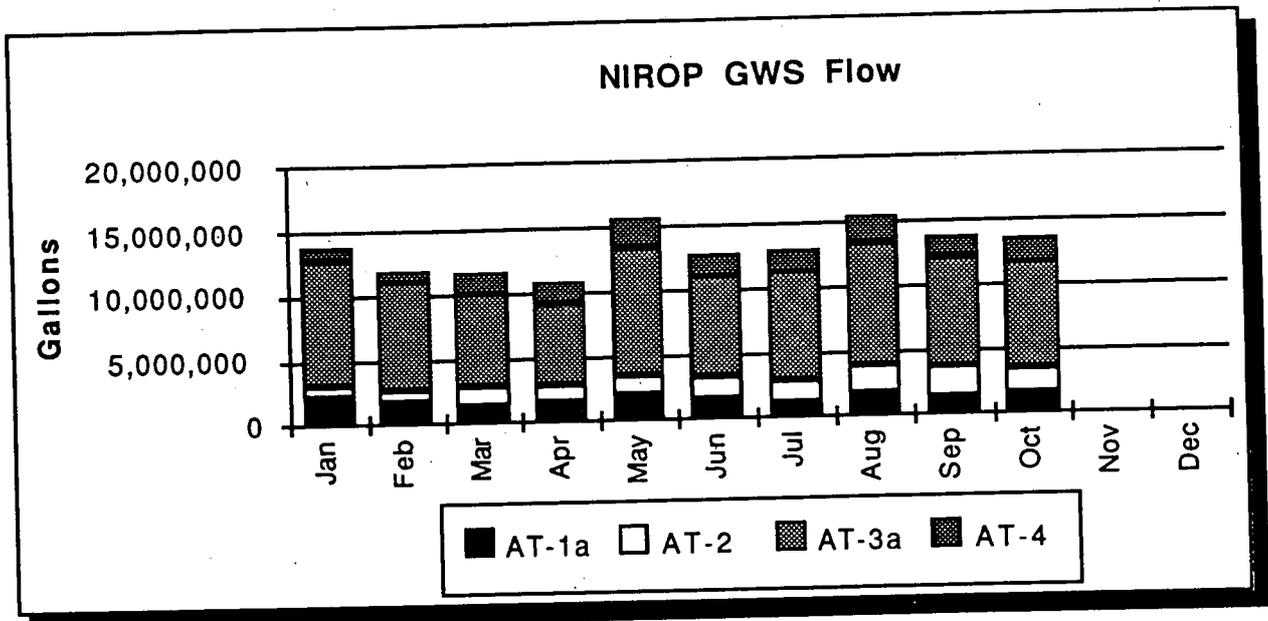
4. The community co-chairperson will be selected by community members of the RAB. Please indicate if you are interested in being considered for the community co-chairperson position on the RAB.

___ Yes, I would like to be considered

5. Are you willing to voluntarily serve on the RAB?

___ Yes, I am willing to serve.

6. By submitting this form, you are aware of the time commitment which this appointment will require of you.



NIROP Maintenance Activities 8 September to 17 November.

* Monitoring Well/extraction well sampling is being conducted November 16, 17, 18.

* Water Level Readings taken 28 September.

* Carbon Vessel replaced 25 October.

* Vapor Phase Carbon Adsorption modeling conducted by CarbonAir on November 9.

Carbon Vessel Bed life is 135 days @2000 ppb.

* Sampling/access port was installed for scrubber packing on 10 November.

Planned Activities

* *Quarterly water Level readings December 22.*

* *Monthly discharge sampling Air and Water.*

TRC Meeting November 17, 1994