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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David Douglas  
Minnesota Pollution Control Agency  
Site Response Section  
Division of Ground Water and Solid Waste  
520 Lafayette Road  
St. Paul, MN 55155-4194

RE: NIROP FRIDLEY - FEASIBILITY STUDY

Dear David:

The Navy has reviewed a letter from the MPCA dated August 30, 1995 addressed to the Navy concerning a new approach to completing the Feasibility Study for OU #2. Pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the EPA, and the Navy, the following responses to attachment 2 of that letter are hereby submitted.

Site maps delivered to the MPCA at the Restoration Advisory Board meeting on October 12, 1995 should be discarded and the attached site maps substituted.

Figure 1 shows the areas where VOCs are present above the MPCA Soil Leaching Model Results. Also, on Figure 1 is a spreadsheet showing the individual soil boring numbers and the analyte above the concentration predicted by the MPCA leaching model to be protective of groundwater. The location and number of drums removed from Operable Unit 2 have been included on site map 1. Based on the information gathered from Appendix A of the Remedial Investigation Report for NIROP Fridley dated September 1993 and removal activities in 1983-84, seventy-four drums have been removed from the ground at NIROP Fridley. Pit numbers correspond to numbers assigned to conductivity anomalies in a US Army Corp of Engineers 1983 geophysical report.

The estimated volume of soil shown in the cross hatched areas was based on an unsaturated soil depth of 20 feet. The areal extent of contamination above the MPCA leaching model results was estimated by drawing circular areas around each boring and then extending an outer circumference around the entire group of borings. This method provides a conservative estimate of the total soil volume impacted to levels above the MPCA soil leaching model results. Based on this estimation method, approximately

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12,000 cubic yards of soil remain in Operable Unit 2 that are not protective of groundwater.

The Navy believes that attempting to estimate the volume of solvent that was released at each site cannot be accomplished with any degree of certainty, for the following reasons: (1) Open pit dumping may have been conducted at any site. (2) Removal reports did not characterize contents or volumes contained in the excavated drums. (3) The Navy has no records indicating the volume the excavated drums contained prior to placement in the landfill.

FIGURES 2, 3, and 4 show the locations where total cPAHs exceed the risk-based remedial goals for industrial land use under the present site situation, industrial land use with good vegetative cover, and unrestricted land use (MPCA letter to the Navy dated August 30, 1995). Due to the limited numbers of soil samples analyzed for these constituents during the remedial investigation in 1993, no consistent pattern of cPAH concentrations could be established. The sum of cPAH concentrations for each soil boring were provided to the Navy in a MPCA letter dated January 26, 1995. To estimate the volume of soil impacted at each boring by cPAHs, RMT assumed a 10-foot diameter area around each boring to a depth of 20 feet

Should you have any questions or comments I can be reached at (803) 743-0484 or Fax (803) 743-0465 or INTERNET dmcabiness@efdsouth.navfac.navy.mil.

Sincerely,

DAVID CABINESS  
Environmental Engineer  
Installation Restoration II  
Division

Copy to: Tom Bloom, EPA

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