

# Minnesota Pollution Control Agency

November 7, 1995

*Responded  
in 20 Dec 1995 letter*

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Scott Glass, Code 1862  
Commanding Officer  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant

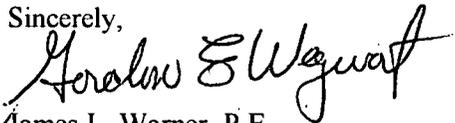
Dear Mr. Glass:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed "Site Evaluation Report for Operable Unit 3, Naval Industrial Reserve Ordnance Plant," (Report) on September 14, 1995. The Report is for Operable Unit 3 of the Naval Industrial Reserve Ordnance Plant Site and was submitted pursuant to the Federal Facility Agreement (FAA), dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency, and the U.S. Navy.

Based on the number of deficiencies in the Report, the MPCA staff cannot approve the Report at this time. The Report shall be rewritten after completing the work pursuant to Attachment I to this letter and resubmitted to the MPCA within 30 days pursuant to Section 14.7 of the FAA.

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

Sincerely,

*for* 

James L. Warner, P.E.  
Division Manager  
Ground Water and Solid Waste Division

JLW:ch

Enclosure

cc: Sidney Allison, Navy, Southern Division  
Kevin Donnelly, P.E., Brown & Root Environmental  
Thomas Bloom, U.S. Environmental Protection Agency

TDD (for hearing and speech impaired only): (612)282-5332

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## Attachment I

### Modification to the Site Evaluation Report for Operable Unit 3 Naval Industrial Reserve Ordnance Plant Dated September 30, 1995

The following are modifications to the "Site Evaluation Report for Operable Unit 3, Naval Industrial Reserve Ordnance Plant," dated September 30, 1995.

1. **Page 1-1, Section 1.0, Introduction.** The Minnesota Pollution Control Agency (MPCA) staff has requested that the Navy finish the Operable Unit Feasibility Study (OU2 FS) and transfer most of the remaining OU2 Remedial Investigation (RI)/FS work to the OU3 RI/FS (see Attachment 3 to the MPCA staff's letter to the Navy, dated August 30, 1995). The Navy shall comply with the MPCA staff's letter of August 30, 1995, with respect to the OU3 RI/FS.

The text shall be revised to state that metals were found in the East Plating Shop soils at high concentrations, not at "slightly elevated levels."

2. **Page 1-2, Section 1.1, Report Purpose.** The purpose of the report is broader than identifying sources of trichloroethene (TCE) contamination under the main building. The Navy shall identify sources of all known contaminants of concern (from OU1) and any other contaminants of concern discovered in any investigation of soil and ground water under the main building or other areas of the site, e.g., "solvents, diesel fuel, oil, paint sludge, cleaners" (see page 5-1, Section 5.1, Drywells) and "solvents, methanol, naphthalene, coolant, machine oil, and paint...TCA, acetone, styrene, and metals such as chromium, lead, and cyanide" (page 5-1, Section 5.2, Pits and Sumps). The contaminants of concern shall include all known degradation products of TCE. The Navy shall work with the MPCA staff to identify a set of methods to be used during the OU3 RI. The Navy shall incorporate in the scope of the evaluation, the concepts for OU1 and OU2 described in the MPCA staff's letter of August 30, 1995, to the Navy. The Navy shall contact the MPCA staff regarding how to incorporate the August 30, 1995, letter into this evaluation report if there are any questions.
3. **Page 1-3, Section 1.2, Site Evaluation Scope.** The site evaluation scope shall address the scope of work detailed in the MPCA staff's letter of August 30, 1995, to the Navy regarding OU1 and OU2. The site evaluation scope shall include all areas under the main building including that portion of the building owned by United Defense, LP. In scoping the OU3 RI/FS the Navy shall comply with Attachment A and B to the Federal Facilities Agreement.
4. **Page 2-2, Section 2.2, Historical TCE Usage.** The Navy shall include in the report all records of disposal of TCE and any other contaminant that was or may have been released into the soil and ground water under the main building. The Navy shall provide the MPCA staff with a yearly inventory of the annual consumption of TCE beginning with its first use at Naval Industrial Reserve Ordnance Plant (NIROP).

5. **Page 3-1, Section 3.0, Site Evaluation Methodology Approach.** At a recent NIROP Restoration Advisory Board (Board) meeting the Board outlined an approach to involve the community and former NIROP employees in the site evaluation. The Navy shall describe this process, including all efforts to involve these parties in the site evaluation and all results of these efforts. The Navy shall identify how many former and present NIROP employees were contacted in these efforts and how many responded.

The Navy shall explain why the report does not describe industrial operations from the beginning of the NIROP operations (in the 1940s) until the 1980s, ostensibly the period when most of the releases would have occurred.

6. **Page 4-1, Section 4.1, Specific Industrial Operation Locations, Second Paragraph.** The Navy shall identify all hazardous materials spilled in the industrial operations within the production areas. Appendix only includes records of spills in the 1980s. The Navy shall provide all documentation regarding how these spills were cleaned up. The Navy shall identify any and all other spills that occurred at NIROP; identify how the spills were cleaned up; and provide the MPCA staff with documentation regarding these spills and cleanups.

The Navy shall identify the dates of operations of all areas of concern (AOCs) listed in the report. The Navy shall identify all contaminants of concern spilled with each AOC, including quantities spilled. For each AOC where this information cannot be produced, the Navy shall explain why this information cannot be produced.

7. **Page 4-5, Section 4.1.4, AOC 15 - Holding Tanks.** The Report states on page 1-2, Section 1.1, that "the primary objective of the site evaluation is to identify sites that could have been sources of TCE contamination . . ." However, the report also states in Section 4.1.4 that it is not known "what chemicals were released from the tanks." Because of this uncertainty, it is premature to conclude that TCE is the primary contaminant of concern, and samples collected during the RI effort shall therefore be analyzed using the U.S. Environmental Protection Agency's target analyte list/target compound list.
8. **Page 4-12, Section 4.2.1, Sanitary Sewer.** The Navy shall produce a map of the original sanitary sewer system at NIROP and any and all modifications to this system. The Navy shall identify all hazardous substances discharged into the sanitary sewer. The Navy shall produce all records investigating the condition of the sanitary sewer line from its inception. The Navy shall propose a plan to investigate the integrity of all existing sanitary sewer lines at NIROP (e.g., by televising the lines). The Navy shall identify the location of any and all abandoned sanitary sewer lines at NIROP. The Navy shall identify areas where sanitary and storm sewers have been repaired and resleeved and indicate on maps areas of potential or actual contaminant releases.

9. **Page 4-13, Section 4.2.2, Storm Sewer.** The Navy shall comply with all items for the storm sewer that were identified above for the sanitary sewer.

The Report states that spills that occurred in the plant may have reached the storm sewer line that discharges directly to the river. The spill report included in Appendix A includes reports through 1986. However, spill reports from 1986 to the present have not been included. This information shall be included in order to assess fully the degree to which spills from the plant have reached this sewer system. In addition, the text states that "several documented spills occurred in the NIROP facility between 1984 and 1986 that may have resulted in discharge of chemicals to the storm sewer system." This is in contrast to comments made by Navy in a meeting held October 11, 1995, that there is no drainage access to storm sewer system within the building. The Navy shall address this contradiction.