



Minnesota Pollution Control Agency

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 7, 1996

Mr. Scott Glass, Code 18610
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 :

As you, Mark Ferrey and I discussed on February 2, 1996, the Minnesota Pollution Control Agency (MPCA) staff is suspending further review of the "Draft Work Plan for the East and West Plating Shops Soil and Groundwater Investigation," (Workplan), dated December 31, 1995, (received on January 2, 1996) until you answer the following questions:

1. How is the east and west plating room investigation related to the Operable Unit 3 Remedial Investigation (OU3 RI) and the OU3 RI/FS Workplan? As we discussed on February 2, approximately 1/4 of the number of subsites presently identified for these areas ("Operable Unit 3 Site Evaluation Report Naval Industrial Reserve Ordnance Plant," (SER) that we received on September 14, 1995. Also approximately 1/2 of the degreasers were/are located in these areas. Therefore, these areas constitute far more than a small part of OU3 to be investigated. As Mark Ferrey and I reiterated, it was the MPCA staff's understanding that the reason for the plating room work is related to difficulties consolidating plating equipment into one area, not because the Navy believes that this area is a major source of the ground water contamination as you stated.
2. Is the Navy prepared to proceed at its own risk (risk of having the data rejected and the work redone because it does not meet the Quality Assurance Project Plan (QAPjP) requirements for the OU3 RI? As you know the Navy is currently working on the OU3 RI QAPjP and its final approval date by EPA and MPCA is currently unknown, but presumably in the next few months.

520 Lafayette Rd. N.; St. Paul, MN 55155-4194; (612) 296-6300 (voice); (612) 282-5332 (TTY)

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3. Why can't the Navy wait until the OU3 RI/FS Workplan is approved by the MPCA and the US Environmental Protection Agency before proceeding with further investigation in these areas?

If you have any questions regarding this letter, please contact me at (612) 296-7818.

Sincerely,



David N. Douglas

Project Manager

Response Unit I

Site Response Section

Ground Water and Solid Waste Division

DD:lk

cc: Sidney Allison, Navy, Southern Division

Thomas Bloom, U.S. Environmental Protection Agency