



# Brown & Root Environmental

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February 26, 1996

TO: DISTRIBUTION

Reference: CLEAN Contract No. N62467-94-D-0888  
Contract Task Order No. 0003

Subject: Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota  
OU3 remedial Investigatin, Feasibility Study, Proposed Plan,  
and Record of Decision  
February 20, 1996 Telephone Conference Call Summary

As directed by the Navy, per reference contract, attached are minutes from the February 20, 1996 telephone conference call to discuss Sections I, II, III and IV of Attachment A to the Federal Facilities Agreement (FFA) and the Draft U.S.EPA Region V Model Quality Assurance Project Plan (QAPP).

Please contact me at (412) 921-8195 or Mark Perry at (412) 921-7217 if you have any questions or comments.

Very truly yours,

A handwritten signature in cursive that reads "Mark T. Perry for".

Kevin F. Donnelly, P.E.  
Task Order Manager

KFD/dt

Enclosure

Distribution

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## TELEPHONE CONFERENCE CALL SUMMARY

Naval Industrial Reserve Ordnance Plant (NIROP) Fridley  
Operable Unit 3 (OU3)  
Remedial Investigation/Feasibility Study (RI/FS) Work Plan

### Discussion Topics

- Sections I, II, III and IV of Attachment A to the Federal Facilities Agreement (FFA).
- Draft U.S.EPA Region V Model Quality Assurance Project Plan (QAPP)

### Date

February 20, 1996.

### Participants

Scott Glass	Southern Division Naval Facilities Engineering Command (SOUTHNAVFACENGCOM)
David Cabiness	SOUTHNAVFACENGCOM
Tom Bloom	United States Environmental Protection Agency (U.S.EPA) Region V
Ida Levine	U.S.EPA Region V
Dave Douglas	Minnesota Pollution Control Agency (MPCA)
John Betcher	MPCA
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Mark Perry	Brown & Root Environmental (B&R Environmental)
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### Discussion Summary

First, Sections I, II, III and IV of Attachment A to the FFA were discussed to make sure that all parties understand the requirements of these Sections and how they apply to OU3. Then, the Draft U.S.EPA Region V Model QAPP was discussed to make sure that all parties agree on how the Model applies to OU3. The results of this discussion are summarized below.

### Discussion Outcomes

1. The United States Department of the Navy (Navy) will submit to the U.S.EPA and MPCA an OU3 RI/FS Work Plan which includes a Work Plan, Field Sampling Plan (FSP), QAPP and Health and Safety Plan (HASP).
2. The OU3 RI/FS Work Plan will be submitted as a single document rather than a master work plan with project specific addendums.
3. The OU3 RI/FS Work Plan will address all planned phases of the OU3 RI/FS field investigation.

4. The FSP and QAPP will be prepared in accordance with the draft version of the U.S.EPA Region V Model QAPP provided by the U.S.EPA on February 16, 1996.
5. The Site Security Plan requirement which is described in Section III, Part A on page 2 of Attachment A to the FFA will be satisfied by including a paragraph in the Health and Safety Plan which references existing Navy Security Plans that limit and control the general public's access to NIROP Fridley.
6. The Surface Water Investigation Plan requirement which is described in Section IV, Task A, Part 4 on page 8 of Attachment A of the FFA will be satisfied by including a narrative in the Work Plan which states that: 1) the Surface Water Investigation completed during the OU1 and/or OU2 RI determined that contaminants from the NIROP are not entering the Mississippi River via surface drainage or storm sewer outfalls, 2) monitoring of the storm sewer outfalls which is required by a National Pollutant Discharge Elimination System (NPDES) permit has not shown any exceedances of the permit discharge limits and 3) inlets to the storm sewers which are located inside the main industrial plant building have been plugged to prevent drainage to the Mississippi River from within the main industrial plant building.
7. The Task C called out in Section IV, Task A, Part 2, Item (2) on page 4 of Attachment A of the FFA refers to Task C. "Review of Alternatives Report and any associated Treatability Studies" described on page 14 of Attachment A to the FFA.
8. The "Hazardous Substance, Pollutant or Contaminant Characterization" and "Source Investigation" requirements identified in Section IV, Task A, Part 2, Subparts a and b, respectively, of Attachment A to the FFA have been satisfied through submission of the Initial Assessment Study submitted in 1983 and the Site Evaluation Report submitted in 1995 and amended to address U.S.EPA and MPCA comments.
9. The Navy will provide the U.S.EPA and MPCA with replacement and/or additional pages, which address U.S.EPA and MPCA comments, for insertion into copies of the Site Evaluation Report which issued previously.
10. The OU3 RI/FS field investigation will be focused to address Subparts c (Hydrologic Investigation) and d (Soils Investigation) of Section IV, Task A, Part 2 of Attachment A to the FFA.
11. The MPCA requested that the Navy specify how and where the seismic imaging study fits into the OU3 RI/FS Work Plan. The MPCA also requested that the Navy respond to the MPCA letter dated January 30, 1996 regarding seismic imaging and other geophysical techniques soon.
12. A QAPP cannot be submitted until a laboratory has been subcontracted. There are no laboratory certification requirements. However, less information will be required in the QAPP if a CLP laboratory is selected.
13. The MPCA will use the QAPP Review Checklist, previously provided to the Navy, as a guide during review of the OU3 RI/FS Work Plan QAPP.
14. Delivery of the Draft OU3 RI/FS Work Plan to the U.S.EPA and MPCA on March 22, 1996 was established. The Navy stated that additional time may be required to award laboratory subcontracts and obtain laboratory standard operating procedures (SOPs). The MPCA and U.S.EPA stated that this schedule can be extended with justifiable cause if the Navy requires additional time to in order to deliver a complete document.
15. There are some conflicting and/or unclear statements included within Attachment A of the FFA. The discussion outcomes listed above clarify the expectations of the U.S.EPA and MPCA with respect to the OU3 RI/FS Work Plan. An OU3 RI/FS Work Plan which meets the requirements

listed in the discussion outcomes will be considered by the U.S.EPA and MPCA to meet the requirements of the FFA.

16. Specific questions and responses related to the QAPP are included in Attachment A.

**ATTACHMENT A**  
**QUESTIONS/RESPONSES - REGION V QUALITY ASSURANCE PROJECT PLANS**

**Q.** Which guidance takes precedence, the model QAPP provided on diskette; the comprehensive CERCLA guidance, QAMS 005/80, the 1993 QAR guidance, or the FFA?

**A.** *The comprehensive CERCLA guidance.*

**Q.** Assuming that the CERCLA guidance is applicable, what takes precedence within this document; the table of contents, the instructions for each section; or the examples?

The signature page example and guidance are inconsistent.

The table of contents guidance and example table of contents are inconsistent.

The example table of contents is inconsistent internally.

The example for Section 1.2 is inconsistent with the table of contents (topography)

The example for Section 1.2.5 is different from the table of contents.

There is a disparity in the title of Section 1.4.3 (TOC versus example)

The section 4 (sampling) example is inconsistent with the table of contents.

**A.** *Use examples for the most part. Please provide written comments for specific issues. Use the example signature page as guidance. Reference all 15 items (to the extent that they are applicable) in Section 4.*

**Q.** A discussion of environmental and health criteria is included in the instructions for the project description. Where should this appear?

**A.** *Section 1.4.3 (DQOs) is the most appropriate location.*

**Q.** The model does not call for submittal of a laboratory QAPP. Is this true?

**A.** *A laboratory QAPP is not necessary. Specific SOPs that are germane to the project should be included as appendices.*

**Q.** There is some indication that historical data treatment must be addressed in the QAPP. Is this true? If so, where should this appear?

**A.** *Historical data should be summarized in Section 1.3.2. Reference to reports or appendices should be included as appropriate. The quality of historical data is not considered an issue. Data should be assumed to be valid for the purpose for which it was collected.*

**Q.** If the QAPP is included as a multi-volume submittal (e.g., with the work plan and field sampling plan), is it necessary to reiterate the information included in Sections 1 and 4 or will cross-referencing suffice?

**A.** *Redundancy should be avoided. You can reference other project planning documents. However, include specific references to specific sections.*

**Q.** Is reference to Standard Operating Procedures adequate for field data collection activities including calibration, sampling, and analysis?

**A.** *As long as they are included and cover the required material.*

**Q.** Can such issues as sample custody in the laboratory and laboratory instrument preventive maintenance be addressed via inclusion of a laboratory SOP as an appendix?

**A.** *As long as they are included and cover the required material.*

**Q.** Section 9 implies (in the introduction) that the laboratory must validate the data. This is atypical. Is this really a requirement?

**A.** *Third party validation is required.*

**Q.** Section 9.3.2 indicates that the laboratory QA manager is responsible for final review. This is atypical. Under the FFA, is it necessary that all data packages and validation documentation be submitted to the EPA?

**A.** *Final review is the responsibility of the validator. The person responsible for validation should be identified in the project organization chart. Only data validation deliverables need be provided to EPA. EPA will provide guidance regarding the required validation deliverable format.*