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13 Mar 1996

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

Subj: NAVAL INDUSTRIAL RESERVE ORDNANCE PLANT, FRIDLEY -
OU2/OU3 COMBINATION AND DNAPL ISSUES

Dear Mr. Douglas:

The Navy has received your letter dated February 27, 1996, which provided additional comments to Navy responses regarding OU2/OU3 combination and DNAPL issues.

The Navy response to these additional comments are provided in Attachment 1 of this letter.

Should you have any questions or comments, please contact me at (803) 820-5587 or by fax at (803) 820-5563.

Sincerely,



SCOTT A. GLASS, P.E.
Remedial Project Manager
Installation Restoration II Division

Attachment:

(1) Navy Response to MPCA Letter Dated February 27, 1996 Regarding OU2/OU3
Combination and DNAPL Issues

Copy to:

US Environmental Protection Agency, Region V, Thomas Bloom.
Brown & Root Environmental, Mr. Kevin Donnelly, P. E.

Attachment 1

Navy Response to MPCA Letter Dated February 27, 1996 Regarding OU2/OU3 Combination and DNAPL Issues

I. Cover Letter:

The Navy does not intend on reproducing large quantities of data for inclusion in the OU3 RI/FS Report that already exist in the OU2 RI/FS Reports. The OU3 RI/FS Reports will incorporate all pertinent information gathered for the entire OU3 area (OU2 being a sub-area of OU3). Any discussions and conclusions will address the entire OU3 area. Any maps or cross-sections developed for the OU3 Reports will include pertinent information from both OU2 and OU3.

II. The Navy's Attachment 1, "Navy Response to MPCA Letter Dated August 4, 1995":

A. Response 1: The Navy has not yet finalized its plan on how seismic reflection will be executed at the NIROP. The Navy intends on meeting with the USGS to develop a plan. The Navy will inform the MPCA when this meeting will be held.

B. Responses 5 and 6: Pursuant to the requirements of the FFA, the Navy shall produce sufficient data and information to support the RI/FS. The Navy is in the process of developing the RI Workplan. If it is deemed appropriate to sample for these constituents, it will be incorporated into the applicable phase of the RI Workplan

C. Response 7: The Navy intends on producing risk values for an unrestricted land use scenario as part of the Risk Assessment. It is the Navy's understanding that producing these risk values does not obligate the Navy to restoring the site for unrestricted land use. Cleanup goals will not be defined until land use is determined.

D. Responses 8 and 10: The Navy will include a reference to Fate and Transport Modeling in the RI Workplan. As previously stated, Fate and Transport Modeling will be addressed in the RI/FS Report.

Attachment 1

Navy Response to MPCA Letter Dated February 27, 1996 Regarding OU2/OU3
Combination and DNAPL Issues

III. The Navy's Attachment 2, "Navy Response to MPCA Letter Dated August 30, 1995":

A. Response 5: The Navy recognizes that there are two conditions that must be addressed. Soil contamination levels to be protective of human health and source contamination levels to be protective of groundwater. The Navy recognizes that soil cleanup, if required, will be driven by the most limiting of the two conditions. This will be fully developed in the Baseline Risk Assessment.

B. Responses 6, 7, 8 and 9: The Navy response referred to the fact that the Navy concurred with the statement that the Navy is committed to conducting an investigation of OU3 to include DNAPL and the extent of the contamination is not yet defined. Specific remediation alternatives, if warranted, will be addressed in the RI/FS Report.

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