

Minnesota Pollution Control Agency

March 21, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the U.S. Navy's (Navy) request for an extension of the due date for submittal of the draft Operable Unit 3 Remedial Investigation/Feasibility Study Work Plan (Work Plan) for the Naval Industrial Reserve Ordnance Plant (NIROP) Site. The request was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the Navy.

The requested extension is from March 21, 1996 to April 22, 1996.

The extension is hereby approved subject to the following conditions:

1. Before the currently scheduled April 9, 1996, meeting at the offices of the MPCA, the Navy shall determine whether or not Region V of the EPA considers the document, "Guidance for the Data Quality Objectives Process, EPA QA/G-4, dated September 1994," (Guidance Document) acceptable for use at NIROP.
2. If Region V EPA agrees that use of the Guidance Document is acceptable, the Navy shall set up a conference call with the authors of the Guidance Document and/or other appropriate EPA staff, Brown & Root, Inc., staff, Tom Bloom and me before April 9, 1996, to present the Navy's plan for implementing the Guidance Document to the authors of the Guidance Document and/or appropriate Region V EPA staff for their review and approval. The Navy shall provide these EPA reviewers with all relevant documentation before the conference call.

*see 4/11/96 letter for
new extension agreement*

** These issues were addressed
during the 4/11/96 meeting
- by - [unclear]*

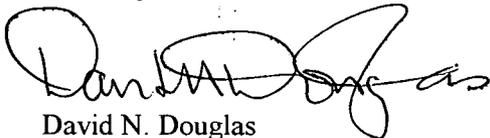
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3. If EPA staff determine that the Navy is using the Guidance Document appropriately, the Navy shall:
 - a. Identify the assumptions used to determine the data quality objectives; (For example, if the Navy is proposing to sample only 8 of the 68 areas of concern (AOCs), the Navy shall identify the assumptions used to determine that 8 AOCs instead of 68 should be sampled. Documentation regarding the uniformity of disposal (qualitatively and quantitatively) supply records and affidavits from former employees shall be used to evaluate how uniformly the AOCs were used for disposal.)
 - b. Estimate the cost savings of using the Guidance Document versus not using the Guidance Document for the Work Plan;
 - c. Identify the NIROP documents (Site Evaluation Report documents) used to implement the Guidance Document;
 - d. Agree that EPA is solely responsible for determining whether or not the Navy is following the Guidance Document; and
 - e. Supply the MPCA staff by April 2, 1996, with all supporting documentation to be used at the meeting on April 9, 1996.

Please understand that the MPCA staff is not bound to use the Guidance Document in our review of the Work Plan.

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

Sincerely,



David N. Douglas
Project Manager
Response Unit 1
Site Response Section
Ground Water and Solid Waste Division

DND:ch

cc: Sidney Allison, Navy, Southern Division
Thomas Bloom, U.S. Environmental Protection Agency