



Minnesota Pollution Control Agency

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 18, 1996

Mr. Scott Glass, Code 18610
Commanding Officer
Southern Division
Naval Facilities Engineering Command
P.O. Box 1900010
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Glass:

The Minnesota Pollution Control Agency (MPCA) staff thank you and your staff for further clarifying the Navy's position on the Operable Unit 3 Remedial Investigation/Feasibility Study (OU3 RI/FS) Work Plan (Work Plan) for Naval Industrial Reserve Ordnance Plant (NIROP) at our meeting on April 9, 1996. We have received our copies of the meeting notes sent to us by Kevin Donnelly in his letter of April 12, 1996.

As agreed to at that meeting, the MPCA staff is forwarding this letter to you regarding Work Plan issues that appear to us to remain unresolved. Please review the list and call me to discuss these issues as soon as possible.

The following is a list of issues that appear to be unresolved at the present time:

1. The Remedial Investigation under the United Defense LP portion of the main NIROP building;

The MPCA staff acknowledges that the Navy intends to respond to the MPCA staff's request to conduct this work by April 19, 1996. The meeting notes correctly indicate that MPCA staff will not consider the OU3 RI/FS complete until this area is investigated.

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2. The level to which OU2 data will be incorporated in the Work Plan;

The Navy's letter of March 13, 1996, did not specifically acknowledge that the Navy would incorporate all of the items identified in Item I of Attachment I to the MPCA staff letter dated February 27, 1996. OU2 data may be included by reference where appropriate.

Also the upcoming drum removal may impact the OU3 RI, i.e., if the Navy finds leaking drums, we request that the Navy contact the MPCA staff to discuss how this information will be addressed in the OU3 RI/FS.

3. The nature and scope of the geological investigation of OU2;

The MPCA staff understands that the Navy will be conducting this investigation using at least seismic imaging. The primary goal is to assist in the investigation of possible dense non aqueous phase liquids (DNAPL) in this area. It is still not clear how this study will be done. Also, the MPCA staff has suggested the use of ground penetrating radar if seismic reflection gives ambiguous results in the first twenty or so feet from the surface. It is presently unclear whether or not the Navy has agreed to conduct GPR.

4. The total number of OU3 Areas of Concern (AOCs) that will need to be investigated;

The MPCA staff understands that in Phase I of the OU3 RI, the Navy is not presently planning to investigate all of the AOCs; however, based on the results of Phase I, the Navy, in consultation with the regulatory agencies, will determine the extent to which the remaining AOCs will need to be investigated.

5. The number of land use scenarios that need to be evaluated;

The MPCA staff agrees that this issue will be resolved when the US Environmental Protection Agency verifies land use. This issue needs to be revisited when the Environmental Protection Agency completes their verification. Please make a note to contact the MPCA staff about this at that time. We need to discuss how this verification will impact the OU3 RI/FS. For example, based on recent discussions with Helen Goeden, if the industrial land use is verified, the risk assessment for OU3 may need only to address this scenario.

6. The extent of the investigation of the storm and sanitary sewers under the main NIROP building;

The MPCA staff understands how the Navy intends to collect data during Phase I to address possible releases from the sewer and/or sanitary sewers; however, after further consideration of the approach presented at the April 9, 1996, meeting, the MPCA staff has decided that a more direct and comprehensive approach such as televising, at least, the main sanitary and storm lines would provide more information about releases and possibly produce it more cost effectively. It is the MPCA staff's understanding that UDLP has comprehensive records of sewer line plugging and repair. We need to further discuss this issue.

7. The scope and timing of treatability studies; and

It is not clear what treatability studies the Navy intends to do and when it intends to do them. The Navy needs to identify these studies in the Work Plan and begin them as soon as possible to reduce delays in completing the OU3 FS. For example, see item C of the Navy's August 3, 1996 agenda notes regarding a treatability study for bioremediation of cPAHs in OU2 soils. Future claims of the intrinsic bioremediation of site contaminants shall be supported by site-specific data.

8. The OU3 RI/FS parameter list;

The parameter list that the MPCA staff requested in Item 2 of Attachment I to the MPCA staff letter dated November 7, 1995, is more specific to the contaminants thought to be released at the Site than the parameter list contained in the Navy's meeting notes of the April 9, 1996, meeting. Due to the nature of disposal activities in the main NIROP building (which did not occur in OU2), the OU3 parameter list must reflect the types of chemicals known or suspected of being disposed in the main NIROP building. To analyze for diesel fuel, the Navy shall use the Diesel Range Organics method developed for the Wisconsin Department of Natural Resources. For what specific metals does the Navy intend to sample? What types of coolants were disposed of at the Site and what methods does the Navy intend to use to look for these contaminants or pollutants?

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The MPCA staff believes that the Navy is proceeding in good faith to provide the best OU3 RI/FS Work Plan possible. We greatly appreciate the improved communication and management initiatives. Also, we think that the Navy understands that this letter is not intended to prohibit the MPCA staff from having comments or modifications to the OU3 RI/FS Work Plan once it is submitted.

If you have any questions regarding this letter, please contact me at (612) 920-5468.

Sincerely,

A handwritten signature in black ink that reads "David N. Douglas". The signature is written in a cursive style with a large initial "D".

David N. Douglas

Project Manager

Response Unit I

Site Response Section

Ground Water and Solid Waste Division

cc: David Cabiness, US Navy

Kevin Donnelly, Brown & Root Environmental

Thomas Bloom, US Environmental Protection Agency