

Minnesota Pollution Control Agency

May 9, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Cabiness, Code 1862
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. Cabiness:

Pursuant to the authority given me in Section 19.2 (4) of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site Federal Facility Agreement, dated March 27, 1991, between the Minnesota Pollution Control Agency (MPCA), the U.S. Environmental Protection Agency, and the U.S. Navy (Navy), I am hereby making the following field modifications to the work conducted under the ongoing barrel removal in the North 40 at the NIROP Site. I believe that these field modifications are reasonable and necessary to the ongoing investigation of the NIROP Site.

Field Modifications

The Navy shall:

1. Chemically characterize the "green sludge-like material" excavated from Anomaly A5 (on May 2, 1996, in the presence of Paul Estuesta, the MPCA on-site inspector) using Methods listed in Table C-4 under soil testing (suitability for use as backfill) from the "Work Plan Removal Action at North 40," (Work Plan) dated August 24, 1995, as amended in the "Addendum to Work Plan Removal Action at North 40," dated February 21, 1996;

The MPCA staff plans to sample the "green sludge-like material" on Monday, May 13, 1996, and I request that the Navy split the sample with the MPCA staff. The MPCA staff plans to sample the storage pile where the "green sludge-like material" has not been mixed with what appears non-visually impacted soils.

2. Cease mixing the "green sludge-like material" with what appears to be nonvisually impacted soils until the material has been chemically characterized by the Navy and the MPCA staff and the Navy and the MPCA staff agree on what to do with the "green sludge-like material" and soil mixed with the "green sludge-like material."

The Navy shall not backfill the "green sludge-like material" and any soil contaminated by the "green sludge-like material" until the Navy and the MPCA staff have determined what to do with the "green sludge-like materials" and any soil contaminated by the "green sludge-like material."

3. Continue the excavation of Anomaly A5 (A5) to until all visually contaminated soil in the side walls is excavated, whether or not the visually contaminated soil is associated with barrels; and

While the Navy excavated all visually contaminated soil and material delineated in Figure 4.4 of the Work Plan, the Navy did not fully excavate all visually contaminated soil visible in the side walls of A5, particularly in the western end of A5. Furthermore, the "green sludge-like material" or soil contaminated by "green sludge-like material" was observed in the north and south side walls adjacent to the areas where it was found in the bottom of A5; this "green sludge-like material" and any soil contaminated by this "green sludge-like material" shall be excavated. This field modification extends the excavation in all directions where visually contaminated soil is visible in the side walls of the A5 excavation.

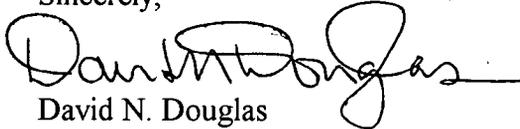
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4. Continue the excavation of A5 into Anomaly B20 (B20) until B20 is excavated and until all visually contaminated soil in the side walls of B20 is excavated.

I am requesting this field modification because I and the MPCA site team believes that B20 is actually the eastern extent of an old disposal trench shown as A5 on Figure 4.4.

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

DD:ch

cc: Greg Hibberd, Morrison Knudsen Corporation
Thomas Bloom, U.S. Environmental Protection Agency