



Minnesota Pollution Control Agency

February 6, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Scott A. 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 Superfund Site

Dear Mr. Glass:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled, "DNAPL Site Evaluation" (Report), submitted on January 2, 1997. The Report for Operable Unit 3 (OU3) of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the U.S. Navy (Navy).

The MPCA staff hereby approves use of the UV Fluorescence method cited in the Report with comments found in Attachment I of this letter. The Navy does not need to respond to the comments.

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

Sincerely,

A handwritten signature in black ink that reads "David N. Douglas".

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

DND:ch

Enclosure

cc: Thomas Bloom, U.S. Environmental Protection Agency

Attachment I

Comments to the UV Fluorescence Method Cited in the Report Entitled, "DNAPL Site Evaluation," submitted January 2, 1997

These method characteristics should be taken into account in the field in evaluating the effectiveness of the method at the NIROP site.

1. The effectiveness of this test is dependent on the soil color. It is more difficult to identify dense nonaqueous phase liquid (DNAPL) on light colored soil which is the most likely color of the soil to be investigated..
2. The method's sensitivity may not be that great at low DNAPL saturations.
3. Adding more water to samples often helps to improve detectability.

The Report suggests that the Hydrophobic Dye Shake test was the most effective method studied. The Navy should experiment with both methods to determine which is the most effective at the NIROP site.