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August 27, 1999

Project Number 7842

Minnesota Pollution Control Agency  
Site Response Section  
Groundwater and Solid Waste Division  
ATTN: David Douglas  
520 Lafayette Road  
St. Paul, MN 55155

Reference: CLEAN Contract Number N62467-94-D-0888  
Contract Task Order 0057

Subject: Anoka Park Investigation Plan  
NIROP Fridley, Minnesota

Dear Mr. Douglas:

Please find attached Navy responses to MPCA comments on the Anoka Park Investigation Plan. The Navy reiterates their belief in the importance of reaching concurrence on any outstanding issues as soon as possible.

Please contact me for any clarification on the enclosed document at (412) 921-8216.

Sincerely,

A handwritten signature in cursive script that reads "Mark Sladic".

Mark Sladic, P.E.  
Task Order Manager

MS/kf

Enclosure

cc: Kerry Morrow, NAVSEA  
~~Joel Sanders, SOUTH DIV,~~  
Tom Bloom, USEPA-Region V  
Richard Harris, RAB Co-Chair  
John Koehnen, Tech Law  
Debra Wroblewski/DER (Cover Letter Only)  
Mark Perry/File 6966

**RESPONSE TO MPCA COMMENTS DATED AUGUST 11, 1999  
MODIFICATIONS TO THE REPORT ENTITLED  
"ADDITIONAL INVESTIGATION AT THE NIROP AND  
ANOKA COUNTY RIVERFRONT PARK" (REPORT)**

1. **Comment:** **Section 2.2.1.2 Groundwater Sampling:** The Navy shall sample the new monitoring wells for OU1 Contaminants of Concern (COCs) using Minnesota Department of Health Method (MDH) 465 (copy of analyte list attached) or equivalent. The OU1 ground water COCs shall be those from the updated list of COCs identified by the OU3 RI Report. The Navy shall sample the ground water for vinyl chloride using MDH Low Level Vinyl Chloride Method 560, or equivalent with a detection limit of at least 0.2 ug/l. The Navy shall receive Luke Charpentier's approval before using any equivalent methods. All methods used by the Navy shall have detection limits that can detect the ground water COCs at their respective Health Risk Limit or Maximum Contaminant Limit, whichever is lower. The soil shall be sampled for the same OU1 COCs.

**Response:** The Navy will be using the same analytical method for VOCs in groundwater in Anoka Park as for the OU3 Investigation. MPCA has previously approved this method, and the QAPP lists the detection limit as 0.22 ug/l for vinyl chloride.

The Navy is using the same lab as in OU3, Laucks. Since Lauck's is based in Seattle WA, it is not likely that they have any familiarity with the cited Minnesota Department of Health low level vinyl chloride analytical method 560. However, since the Navy is not proposing changing analytical methods, the Navy feels that the previous MPCA approval for the OU3 method still applies.

2. **Comment:** The Navy shall sample soil pursuant to the revised policy on U.S. EPA Method SW-0846/5053 as specified in the MPCA memo dated September 11, 1998, sent to the Navy by e-mail on August 3, 1999 (copy attached).

**Response:** The Navy agrees.

3. The Navy shall sample the new monitoring wells concurrent with semiannual ground water network monitoring in October, 1999. The sampling date shall be adjusted accordingly if necessary so that the existing wells and the new wells are sampled concurrently.

**Response:** The Navy agrees.

4. **Comment:** **Table 2.3 Summary of Proposed Ground Water Sampling for Chemical Analysis:** The MPCA modified the monitoring wells monitored for Natural Attenuation Parameters to include upgradient monitoring well nest 35.

**Response:** The Navy agrees.

5. **Comment:** **Table 2-6:** Methane samples must be preserved with sulfuric or hydrochloric acid. In addition, samples must be placed in containers that will prevent volatilization. We recommend Wheaton vials with a butyl rubber septum and a crimp cap seal.

**Response:** The Navy agrees.

6. **Comment:** **Section 2.5 Decision Rules:** The MPCA staff cannot accept the decision rule related to the installation of MS-53 PC at this time. Since in Minnesota, the installation of ground water

monitoring wells is governed by the MDH well Code, the MPCA staff request that this decision rule first be discussed with the MDH. The MPCA staff requests that the Navy discuss the installation of the decision rule with Mark Hoffman, of the MDH at (651) 215-0813 as soon as possible, preferably before the Navy applies for the MDH permits for their installation. Mr. Hoffman will be evaluating the permit applications.

The MPCA modifies the decision rule regarding MS-53PC to read that a joint decision concerning this well that involves the MPCA will be made at the time of the drilling for this well. If it is determined that it is not advisable to install the well in the proposed location, all parties will agree on an alternative location for this well.

**Response:** The Navy has consulted with Mark Hoffman, as requested. Mr. Hoffman has stated that the actual contract well driller is the entity that will be applying for well permits. The Navy contractor, Boart-Longyear, is known by Mr. Hoffman who acknowledges their qualifications.

The Navy agrees to consult with other team members during field operations to determine well MS-53PC location. However, the Navy reiterates for the record its general discomfort with the installation of this bedrock well through the contaminant plume. This discomfort is based on professional judgement of a disproportionately negative risk/reward relationship between the collection of data versus the potential to impact the bedrock aquifer through aquifer cross contamination during installation.

7. **Comment: Section 7.7 Water Level and Pumping Rate Measurements:** The work plan includes one set of synoptic water levels measurements from all existing and new monitoring wells. The MPCA modifies the water level monitoring schedule to include four quarterly synoptic water level measurement events to include all monitoring wells including old, new and Food Manufacturing Company monitoring wells. The quarterly measurement will enable measurement of seasonal hydraulic head changes that may effect contaminant distribution. The seasonal changes may also be significant enough to require input of transient conditions into the ground water model of the Site. Such seasonal changes may also be a significant factor to be evaluated in remedy selection.

**Response:** The Anoka County Park Groundwater Investigation Report will contain one set of synoptic water level measurements from existing and new monitoring wells. However, the additional three quarterly measurements are subject to inclusion in a future NIROP Annual Monitoring Report. However, as the three additional water level measurements are beyond the scope of the Navy's Anoka Park contractor, their completion is dependent on the Navy's ability to schedule and fund a contractor to do this work.

8. **Comment: General Modification:** As with all soil and ground water sampling and analytical techniques to be used at NIROP, the Navy shall follow the MPCA Risk-Based Site Evaluation Manual.

**Response:** The Navy believes it is in compliance with the MPCA Risk-Based Site Evaluation Manual. Please notify us on specific issues, if any, where we have misinterpreted the manual.

9. **Comment: General Modification:** Approval of this plan does not preclude the potential need for additional chemical sampling of newly installed wells. As part of the review of the Annual Monitoring Reports (AMR), it is part of the review of each years Report to evaluate and make revisions to the monitoring well network. Upon review of the data collected form existing and newly installed wells, the monitoring well network should be reviewed and revised if necessary to improve understanding of ground water conditions at the Site.

**Response:** The Navy agrees to review and revise the AMR network in consideration of the newly installed wells.

10. **Comment:** **General Modification:** All field measurement data collected in this field effort including lithologic logs, well logs, water level measurements, ground water chemistry results, natural attenuation results, risk assessment evaluation of data collected, a list of COCs, and other supporting information shall be reported in a report under the title of Field Investigation Report.

If field data from this effort is collected and evaluated in time, it will be included in the 1999AMR. If data is not obtained in time to be included in the 1999 AMR, it will be included in the 2000 AMR.

**Response:** The Navy agrees

11. **Comment:** **Table 2.4:** The total microbial plate counts will likely not be very informative without some criteria to interpret them. The ground water will likely contain something like 100 to 1000 bacteria per milliliter. Is there some concentration that would affect a remedial decision?

**Response:** The Navy believes it heard on the conference call on August 6 that MPCA did not feel that the microbial plate counts would provide meaningful information. We have removed them from the scope of investigation. Per the same call, it was our understanding that the team was in agreement on this point.

12. **Comment:** **General Comment:** Rotosonic drilling will raise the temperature of the soil/sediment cores. This should be considered in the analysis of VOC concentrations in soil samples collected using Rotosonic drilling.

**Response:** The Navy agrees.