Minnesota Pollution Control Agency

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 8, 1999

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Joel R. Sanders, Code 1868
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Sanders:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled "Project Proposal, Field Test: Applicability of Water-Filled Polyethylene Diffusion Samplers for Long-term Monitoring of Volatile Organic Compounds in Ground Water, Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota (Project Proposal)," dated August 3, 1999. The Project Proposal is for Operable Unit 1 (OU1) of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (U.S. EPA), and the U.S. Navy (Navy).

The MPCA staff response to the Project Proposal can be found in Attachment I of this letter.

If you have any questions regarding this letter, please contact me at (651) 296-7818.

Sincerely,

David N. Douglas
Project Manager
Site Remediation Section
Metro Division

DND:csa

Enclosure

cc: Thomas Bloom, U.S. EPA (w/enclosure)
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosure)

520 Lafayette Rd. N.; St. Paul, MN 55155-4194; (651) 296-6300 (Voice); (651) 282-5332 (TTY)
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Attachment I

MPCA Staff Response to the Document Entitled "Project Proposal, Field Test: Applicability of Water-Filled Polyethylene Diffusion Samplers for Long-term Monitoring of Volatile Organic Compounds in Ground Water, Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota," Dated August 3, 1999

1. Please identify the Quality Assurance Project Plan that will be used for this work.

2. Please identify the parameter list for the study.

3. When using deionized water, a field blank must be taken before the water is introduced to the diffusion sampler for the parameters of the sample analysis.

4. A sample blank must be taken to ensure that the low-density polyethylene does not leach any of the COCs.

5. Please identify what will be done regarding duplicates. A ratio of 1 duplicate to 10 samples is recommended.

6. Please explain why the removed diffusion sampler is allowed to sit for 30 minutes prior to sample draw. The staff is concerned that COCs will move through the semi-permeable membrane to the atmosphere resulting in false low analyses.

7. Samples must be cooled to 4 degrees Centigrade immediately after collection.

8. Are there any expected differences in using these samplers for water table wells versus submerged screen wells?

9. How was 14 days established for the interval of equilibration?

10. How will line stretch be addressed? This may effect the true depth of sample collection.

11. How will algae, iron and other well coatings affect the sampler's ability to absorb COCs? What are the consequences of finding these coatings on samplers?

12. Please describe the statistical method that will be used to compare diffusion sampling results with conventional sampling results.