



Minnesota Pollution Control Agency

February 10, 2000

CERTIFIED MAIL NO. Z 474 458 323
RETURN RECEIPT REQUESTED

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

RE: NPDES/SDS Permit No. MN 0000710
Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota

Dear Mr. Sanders:

The Annual Operations and Maintenance Report, Groundwater Treatment Facility, NIROP Fridley, Revision 0 (O&M Report), dated October 30, 1999 prepared by Morrison Knudsen Corporation for the Dept. of Navy/Southern Division has been forwarded to me for reconciliation with the National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) permit monitoring and reporting requirements.

The data contained in this report appear inconsistent with NPDES/SDS permit requirements as follows:

1. Volatile Organic Compound (VOCs) samples were analyzed by a laboratory that is not certified by the Minnesota Department of Health. Pursuance to PART I.D.1.b. of the above referenced permit, "... all samples collected to determine compliance with this permit shall be analyzed by a laboratory certified by the Minnesota Department of Health..." We do not agree that Environmental Testing Fact Sheet authorizes the use of a non-certified laboratory for the following reasons:
 - The fact sheet is specific to what was then the Ground Water and Solid Waste program. The NPDES/SDS permit is under what was then the Water Quality Program; and
 - The fact sheet does state: "Under some laws or enforcement documents, other quality assurance requirements are spelled out which must be performed." The permit clearly states that a laboratory certified by the Minnesota Department of Health shall be used.
2. Pursuance to PART I.B.2. of the above referenced permit, "EPA methods 601 & 602 shall be used for all {VOC}analyses." VOC samples were not analyzed using the required methods.
3. Analyses for Iron and Manganese were performed using SW-846 6010. In accordance with PART I.D.1.c. Test Procedures, "Analyses of parameters shall conform to regulations promulgated pursuant to ... 40 Code of Federal Regulations Part 136." Solid waste test methods are not approved for wastewater analyses.

As discussed in our phone conversation of Wednesday, February 9, 2000, henceforth, it is expected that all VOC analyses, excepting Carbon Disulfide, shall be analyzed using EPA Methods 601 and 602. The twice yearly VOC scan shall be conducted using EPA Methods 601 and 602. It is understood that EPA Method 601 covers the determination of 29 purgeable halocarbons, and that EPA Method 602 covers seven purgeable aromatics, three of which are duplicated by 601. It is also understood that Carbon Disulfide will not be analyzed as part of the twice yearly VOC scan.

We are unable to determine the approved test method for Carbon Disulfide despite a review of 40 CFR § 136.3 and *Standard Methods for the Examination of Water and Wastewater, 16th Edition*. As no limit has been applied to this parameter, we will authorize the use of SW-846-8260. Please note that this is the only parameter for which a solid waste test method is authorized. We can only provide this authorization because 40 CFR § 136.3 does not preclude our ability to do so.

Analyses for Iron and Manganese cannot be performed using SW-846 6010. Please refer to 40 CFR § 136.3 for choosing an appropriate and approved method for wastewater analyses.

The MPCA will not be taking enforcement action at this time, because monitoring results submitted to date do not indicate a detrimental impact to the environment as a result of your permit non-compliance. However, continued non-compliance will require us to re-evaluate this determination and will not prevent us from taking future enforcement action based on past your past non-compliance history.

If you have any questions please contact me at (651) 297-5791.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah', with a long horizontal flourish extending to the right.

Deborah A. Schumann
Compliance and Enforcement
Major Facilities Section
Metro District

DAS:lao

cc: Mr. Doug Hildre, Env. Control Manager