



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

March 15, 2000

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 Mark Sladic's letter to me dated February 10, 2000. This letter was sent in response to MPCA staff letter dated November 17, 1999, concerning comments to the Remedial Investigation for Operable Unit 3 (OU3 RI) as indicated below:

1. Remedial Investigation for Operable Unit 3, Volume I of IV, Revision 1;
2. Supplemental Remedial Investigation Information Report;
3. A new Appendix A.6, Field Task Modification Requests, to Volume II of IV; and
4. New narrative for the first 12 pages of Appendix F, Data Validation, and a new Appendix G.8, Screening Evaluation for Exposures to Surface and Subsurface Soil (0 to 12 feet) Industrial Workers and Minor Construction Workers, to Volume IV of IV.

The OU3 RI is for 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 responses follow the numbering scheme originally found in the MPCA staff letter of November 17, 1999. This numbering scheme was followed in Mark Sladic's letter to me dated February 10, 2000, except that in some cases items were broken up to indicate concurrence on some portions of the MPCA review response and non-concurrence on other parts. This letter follows Mark Sladic's subdivision of comments. We thank the Navy for its efforts in moving toward agreement on so many of the technical issues affecting the OU3 RI.

Mr. Joel R. Sanders

Page 2

March 15, 2000

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

Sincerely,

A handwritten signature in black ink, appearing to read "David N. Douglas". The signature is fluid and cursive, with the first name "David" and last name "Douglas" clearly distinguishable.

David N. Douglas, Project Manager

RCRA/Superfund Unit

Site Remediation Section

Metro District

DND:csa

cc: Thomas Bloom, U.S. EPA (w/enclosures)

Mark Sladic, Tetra Tech NUS, Inc. (w/enclosures)

Attachment I

Modifications to Remedial Investigation for Operable Unit 3, Volume I of IV, Revision 1, Dated August 1999

Agreement Reached

The Navy's responses indicate that the Navy and the MPCA staff have come to agreement on the following items: 1, 2, 3 (see below), 4, 5a, 5c, 6, 7, 10, 11, 12, 13, 15, 16, 17, 18, 21 (acknowledge it was skipped), 22, 23, 24, 25, 26, 27a, 27b, 27d, and 28.

3.

On March 3, Mark Sladic and I talked about this item. Based on this conversation, it is my understanding that the Navy intended that Bullet 6 indicate that evidence of DNAPLs in subsurface soils was not found based on the soil samples of the OU3 RI. However, as indicated in Bullet 8, the level of TCE and 1,2-dichloroethene in the ground water under the building indicates that DNAPLs are likely present under the building. Since DNAPLs are not found exclusively in ground water, subsurface soils somewhere under the building are likely contaminated by DNAPLs. It is my understanding that the Navy agreed to modify one or more of these bullets accordingly.

Further Clarification or Agreement Still Not Reached

The MPCA staff believes that further clarification of the Navy's position is needed or that the Navy still needs to address issues as indicated below.

5b.

The MPCA staff agrees that the human direct contact risk scenarios did not apply to depths greater than 12 feet and did not intend that the Navy evaluate direct contact exposures or conduct a risk assessment of soil greater than 12 feet. However, contamination present below 12 feet should be *briefly* discussed, kept in mind and carried forward in the process (e.g., in crafting language for the institutional controls). Navy's response indicates that the sample containing high levels of TCE was taken within the water table, and therefore is more representative of ground water contamination than soil contamination. The sentence, "[t]he following criteria were utilized to determine COCs for soils located at depths greater than 12 feet," recommended in the previous MPCA staff comments should be deleted and a new paragraph containing a *brief* discussion regarding the deeper contamination should be added. The discussion should describe the contamination present below 12 feet; institutional controls necessary to control access to the contamination; and interactions with or impacts on ground water. If the contamination is more representative of ground water, or will be dealt with in connection to the ground water remediation, please include this in the discussion.

8.

The MPCA staff agrees that this discussion has advanced because of discussions at partnering meetings. However, the Navy still needs to memorialize that it proposes to evaluate active remedies for the site, such as the pumpout well, etc.

9.

The staff cannot determine whether or not the Navy agreed to provide the indicated information in the facility history. Please keep in mind that this document is also for the public. Please clarify.

14.

Information regarding the number of nondetects exceeding levels of concern should be provided for all COCs affected not just vinyl chloride.

16.

As indicated the Navy intends to further address issues raised in this item and the associated email message from me to Mark Sladic referenced.

19.

There is still no explanation for why AOCs 17, 44, and 71 are missing from the AOC groups of Section 4.3.4. Please clarify.

20.

See 5b.

27c.

The MPCA staff does not understand the last statement of this item. Please explain. Also see 5b.

Attachment II

**Modifications to
Supplemental Remedial Investigation
Information Report,
Dated August 1999**

The Navy's responses indicate that the Navy and the MPCA staff have come to agreement on all items in Attachment II.

Attachment III

**Modifications to
New Narrative for the First 12 Pages of Appendix F, Data Validation,
and a New Appendix G.8, Screening Evaluation for Exposures
to Surface and Subsurface Soil (0-12 feet)
Industrial Workers and Minor Workers, Volume IV of IV,
Dated August 1999**

The Navy's responses indicate that the Navy and the MPCA staff have come to agreement on all items in Attachment III.