



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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CHICAGO, IL 60604-3590

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NIROP FRIDLEY  
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REPLY TO THE ATTENTION OF: SRF-5J

July 16, 2002

Mr. Jeff Meyers, PE, CHMM  
Code ES336  
Southern Division, Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, SC 29419-9010

**Subject:** *Review of the draft Proposed Plan for Operable Unit (OU) 2 and Operable Unit (OU) 3, Naval Industrial Reserve Ordnance Plant Fridley, Fridley, Minnesota.*

Dear Mr. Meyers:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the draft Proposed Plan for Operable Unit (OU) 2 and Operable Unit (OU) 3, Naval Industrial Reserve Ordnance Plant, which we received on July 5<sup>th</sup>, 2002. After reviewing the document, and in consultation with the Minnesota Pollution Control Agency, U.S. EPA has the following comments:

- 1. Section V, Summary of Site Risks, pages 8 through 11.** Due to the complexity of the risk assessment discussion, U.S. EPA (and MPCA, based on their July 8<sup>th</sup>, 2002 e-mail) believes the general public may be confused by this discussion. As an alternative, perhaps a summary table, along with references to the appropriate portions of the RI would be sufficient documentation, while avoiding some potential confusion.
- 2. Section IV, Site Descriptions, page 5.** MPCA, in a July 8<sup>th</sup>, 2002 e-mail, has relayed a concern related to explaining the risk scenarios to the public before the detailed risk discussion. Although U.S. EPA does not feel it is necessarily inappropriate to set the stage by discussing the risk scenarios prior to a detailed presentation of the risks, the Agency does agree that the including the risk scenarios information in a section called "Site Descriptions" may be confusing, and that perhaps the bulk of this information should be presented at the beginning of Section V.

With this in mind, the discussion provided in Section IV could be revised to put more focus on the various sampling intervals for the risk assessment scenarios, and then a reference could be made stating that more detailed descriptions of the risk scenarios can be found in Section V (which would then be modified to include all of the scenario

information currently presented in Section IV). By discussing the sampling intervals up front, the Agency believes that the relevance of the various sampling depths presented in the OU-specific discussions in Section IV will be made clearer. This may be more appropriate than waiting until the Operable Unit 3 discussion at the top of page 7 to define the various intervals.

3. **Section V, Summary of Site Risks, first bullet item, page 8.** MPCA, in a July 8<sup>th</sup>, 2002 e-mail, has relayed a concern regarding the discussion of residential use in Section V when residential use is not appropriate. U.S. EPA does not share this concern, as the Agency typically evaluates residential use as a baseline, and the discussion provided in this bullet item clearly states that residential use of the property is not appropriate. Therefore, U.S. EPA does not believe that any changes to the text are required for this issue.
4. **Section VII, Alternative 2: Land Use Controls (Engineering Controls and Institutional Controls), pages 12 and 13.** The Agency believes that description of Alternative 2 is too vague. It leaves the specifics about institutional and engineering controls to some later, unidentified point. The Navy should be more specific right now about what controls it is proposing to implement at NIROP. However, somewhat vague statements are made such as in the last paragraph of page 12, "Institutional controls *could* included restricting the use of the NIROP to industrial or commercial uses..." The same indeterminacy applies to the Navy's description of the engineering controls. At this point, the Navy should be discussing specifically what it proposes to do, not what it *could* do. Also, there are significant differences between industrial and commercial uses. Typically, commercial uses are less restrictive than industrial uses. The Navy should be clear on specifically which of these uses is being proposed. If there are locations on the property where industrial uses are appropriate, and others where commercial uses are appropriate, these distinctions should be clarified in the text.
5. **Section VII, Alternative 2: Land Use Controls (Engineering Controls and Institutional Controls), page 13.** In its description of the costs associated with the implementation and administration of LUCs, the Navy should include the costs of enforcement activities if a violation of the land use restrictions is detected.
6. **Section VIII Evaluation of Alternatives, second sentence of last paragraph, page 13.** This sentence states, "Both US EPA and MPCA have indicated agreement with the preferred alternative." However, the preferred alternative is not identified until Section IX. Either clearly state the preferred alternative in this sentence, or move this discussion after Section IX.

If you have any questions regarding this letter, please feel free to contact me at (312) 886-5907.

Sincerely,

A handwritten signature in black ink that reads "Craig Thomas". The signature is written in a cursive style with a prominent initial "C" and a long, sweeping underline.

Craig Thomas, P.G.  
Remedial Project Manager  
Federal Facilities Response Section

cc: David Douglas, MPCA