



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: SRF-5J

July 25, 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 revised Proposed Plan for Operable Unit (OU) 2 and Operable Unit (OU) 3, and response to comments, Naval Industrial Reserve Ordnance Plant Fridley, Fridley, Minnesota.*

Dear Mr. Meyers:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the revised Proposed Plan for Operable Unit (OU) 2 and Operable Unit (OU) 3, Naval Industrial Reserve Ordnance Plant, which we received on July 22nd, 2002. After reviewing the document, and the associated responses to comments U.S. EPA has the following comments:

Response To Comments:

Response To Comment 1. The response is accepted.

Response To Comment 2. The response is accepted.

Response To Comment 3. The response is accepted.

Response To Comment 4. The response is accepted.

Response To Comment 5. The response is accepted.

Response To Comment 6. The response is accepted.

New Comments on Revised Document:

Section III, Second to last sentence of last paragraph, page 4. As a minor comment, it may

be more desirable to identify the removal action as a time-critical removal action, rather than an interim removal action. This will make it consistent with the description provided in the "Purpose" section of the Action Memorandum for Excavation of PAH Contaminated Soil in Area A4 of the North 40, June, 2002.

Section III, last paragraph, page 4. The basis of the recommended alternatives in the Proposed Plan are generally predicated on the fact that "surface soils" have already been addressed through historical or recent remedial actions. However, this fact is not specifically spelled out until late in the document. To enhance the description of the alternatives, it would be beneficial to include at least a general statement earlier in the Proposed Plan to bring this issue to the reader's attention earlier in the document, clearly stating that the unacceptable surface soil risks have been addressed.

Section IV. Site Descriptions, first paragraph, page 5. The first paragraph on the top of page 5 states "Some groundwater samples were collected during the OU3 investigation, but this groundwater data is being incorporated into the OU1 data set and will be used to develop future OU1 remedial decisions, if any." The basis of this statement appears accurate, however the very last part which states "if any" is not necessarily accurate, and is not appropriate for this document. This sentence in the Proposed Plan should be revised to remove the phrase "if any."

Section IV. Site Descriptions, OU2, Third Bullet Item, Page 5. It is generally intuitively understood what the term "Anomalies" mean in the context of the Proposed Plan. However, the discussion in the third bulleted paragraph on Page 5 first presents general investigation results around Anomalies #13 and #14, followed by a discussion of what the term Anomalies means (i.e., "areas indicated by electronic instrumentation as areas possibly containing buried material") in these instances. It would be beneficial to reorder these sentences within this bulleted paragraph so that the definition of Anomalies is presented first.

Section V. Summary of Site Risks, seventh sentence of second paragraph, page 8. Some clarification to the language in the second paragraph appears warranted to better define how these risks may apply. The seventh sentence in the second paragraph may be more clear and descriptive if modified to read "A focus was placed on future construction because these activities typically penetrate below the ground surface allowing potential contact with subsurface contamination." This would provide clarification to the reader that the risk evaluation was forward looking and is not based on any known or suspected exposures.

Section V. Summary of Site Risks, first sentence of last paragraph, page 8. It is understood that the Minnesota Pollution Control Agency (MPCA) has been heavily involved in defining risks at the site and in directing these and future activities. Since this occurred for many reasons, it may be more beneficial to restate the first sentence of the last paragraph on page 8, which states "In accordance with MPCA methodology...." and revise it to be acknowledge acceptance of the MPCA methodology by U.S. EPA and the U.S. Navy for the purposes of this site-specific risk assessment.

Section V. Summary of Site Risks, last paragraph, page 9. The statement in the last

paragraph of this section could give significant pause to a reader in that it does not present assurances that these exposures are not occurring, but rather that the exposures are unlikely. It is suggested that this discussion be written to present statements of fact instead of uncertainties.

Section VII. Summary Of Remedial Alternatives, Page 11. The first sentence following the bullets at the top of Page 11 states "These LUCs, as described above, would be protective and permanent to the extent they remain in place." While possibly an argument of semantics, this statement as presented does not appear to provide an adequate level of assurance to the public that the LUCs will remain in place as long as necessary to be protective of human health and the environment. The statement should be modified to include more demonstrative language designed to assure the public of the efficacy of the LUCs. Alternatively, additional discussion would appear warranted which presents information on how/why these LUCs would be removed and when.

Section VII. Summary of Remedial Alternatives, last sentence of second to last paragraph, page 11. Please revise this sentence to read, "The Navy ~~intends to~~ *shall* include...."

Section IX Summary fo the Preferred Alternative, second to last sentence of last paragraph, page 12. As a minor comment, this sentence refers to, "The following table...". However the table in question actually precedes this paragraph. Please either revise the text, or move the table, so that an appropriate reference to its location is given.

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

Sincerely,



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

cc: David Douglas, MPCA