



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

N91192.AR.000626
NIROP FRIDLEY
5090.3a

REPLY TO THE ATTENTION OF: SRF-5J

September 26, 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 Completion Report letter for Excavation of PAH Contaminated Soil in Area A4 of the North 40, Naval Industrial Reserve Ordnance Plant Fridley, Fridley, Minnesota.*

Dear Mr. Meyers:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Completion Report letter for the Excavation of PAH contaminated Soil in Area A4 of the North 40, Naval Industrial Reserve Ordnance Plant, which we received on August 24th, 2002. After reviewing the document, U.S. EPA has the following comments:

- 1. Page 1, second paragraph, second-to-last sentence.** Please provide the total volume of soil removed in terms of cubic yards; as was outlined in Section 5.1.3 of the Action Memorandum. This is necessary as the Non-Hazardous Waste Manifest in Appendix A shows a volume expressed as 45 yards, and the Special Waste Disposal Application in Appendix A shows an anticipated volume of 60 tons.
- 2. Page 1, second paragraph, last sentence.** In the text, please provide the date that the roll-off containers were shipped off-site.
- 3. Page 1, third paragraph, first sentence.** Is there any certification information available for the material that was used as backfill? If so, please provide this as an attachment to this letter.
- 4. Page 1, last paragraph.** Prior to this paragraph, a new paragraph should be inserted which provides all of the relevant details on the collection of the waste characterization sampling. For example, when did the sampling occur? Was an individual sample collected from each roll off box, or was a composite submitted? Who collected the

sample? Where was the sample material sent for waste characterization analysis? What types of analyses were conducted, etc.

5. **Contractor Demobilization.** In the appropriate paragraph of the Navy's choosing, please provide the date that the contractor demobilized from the site, as was done for the mobilization date.
6. **Attachment A, Special Waste Disposal Application.** According to Section 3, Properties Of Waste, on the first page of the Special Waste Disposal Application, the soil exhibited a pH of 9.1-12.4. However, the pH field in Section 5, Chemical Characteristics, on the second page of this Application has only a straight line through it, and no other information is provided in Attachment B regarding the pH. Please provide the relevant supporting information which documents pH.

Also, the fields for PCB's and TPH in Section 5 of this Application have lines through them, and no information is provided, suggesting these were not analyzed for. However the Generator Analytical Certification Form states that the waste does not contain regulated concentrations of PCBs or TPH. Please provide the data which serves as the basis for this certification.

Similarly, the fields for Toluene, Ethyl Benzene and Xylene in Section 5 of this Application show "ND", which a footnote included below Section 5 shows to be non-detect. However, the table of Waste Characterization Analytical Data in Attachment B provides no information on these parameters. Please provide the basis for this certification.

After reviewing Attachment A, and comparing it to Attachment B, it would appear that Attachment B currently provides only the TCLP results, and that other analyses were performed (as reflected in the "Total" ppm column in Attachment A) which have not been provided. Please provide these additional results. By including another spreadsheet in Attachment B, the Navy should be able to address all of the above questions for Attachment A.

7. **Attachment A, Generator Analytical Certification Forms.** Two Generator Analytical Certification Forms have been provided in this attachment, suggesting multiple analytical samples were collected. However, Attachment B, Waste Characterization Analytical Data, only provides TCLP results for one sample. This leads to a great deal of confusion. Please clarify if there were multiple forms for multiple samples. Alternatively, if there are multiple copies of the same form in this document due to collation problems, please remove the extraneous copy

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 long horizontal stroke at the end.

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

cc: David Douglas, MPCA