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October 18, 2002

Mr. Jeff Meyers
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P.O. Box 190010
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RE: Contract No. N62467-98-D-0995
Contract Task Order 0024
Naval Industrial Reserve Ordnance Plant (NIROP), Fridley, Minnesota
Revised Completion Report for Excavation of PAH Contaminated Soil in Area A4 of the
North 40

Dear Mr. Jeff Meyers:

CH2M HILL Constructors, Inc. (CCI) is pleased to provide you with this revised letter to document the completion of the soil excavation in Area A4 of the North 40 at NIROP Fridley, MN. This revision incorporates all of US EPA's comments on the previous letter dated August 21, 2002. All work have been completed in accordance with applicable local, state, and federal rules and regulations and the *Action Memorandum for Excavation of PAH Contaminated Soil in Area A4 of the North 40 (TetraTech NUS, June 2002)*. A description of the completed time-critical removal action is provided below.

Upon mobilization to the site on June 25, 2002, a utility survey of the area was performed by a third party vendor (Hance Utility Services). The designated area (10' radius x 3' deep) was excavated by mechanical means by Bay West, Inc. under subcontract to CCI. The excavated soil was placed in four roll-off containers. The total estimated volume of soil excavated and disposed of was 45 cubic yards. The roll-off containers were properly labeled in accordance with 49 CFR 172, 173 and 178 and staged in the North 40 area until shipped off-site for disposal on August 06, 2002.

The excavated area was backfilled with clean fill material from an off-site borrow source (Aggregate Industries, Eagan, MN). Certification from Aggregate Industries, indicating that the backfill material is from a virgin source containing no contaminants, is included in Attachment E. The backfill was placed and compacted in equal, continuous layers not exceeding 12 inches of compacted lifts. Excavated and areas disturbed during excavation was restored by placing six inches of topsoil followed by seeding and mulching. The topsoil placement was such that it matched the existing grades and slopes.

Appropriate environmental protection controls were implemented during the execution of the field work to minimize environmental impacts. Personnel and equipment that came in contact

with the soil were decontaminated prior to leaving the area to avoid the possibility of inadvertently spreading contamination. Decontamination of personnel and equipment were performed in accordance with applicable provisions of 29 CFR 1910.120.

One waste characterization soil sample was collected, as specified in CH2MHILL's workplan letter (dated June 20, 2002), on June 25, 2002 by Alan Bowles of Baywest. This grab soil sample was collected at the center of the excavation, where the previous sample indicated highest contamination. This soil sample was sent to Severn Trent Laboratories (STL) in University Park, IL for analysis. This soil sample was analyzed for TCLP (VOC, SVOC, Pesticides, Herbicides, and Metals) and reactivity, corrosivity, and ignitability as specified in CH2MHILL's workplan letter (dated June 20, 2002). The results of previous investigation sample (Sample #AB032A), collected on June 09, 1992, was also used to characterize the soil for disposal. The data from Sample #AB032A is included in Attachment B.

Based on the waste characterization sample data, previous investigation sample data, and generator's knowledge of the wastes generated at the facility, the soil was disposed of off-site as non-hazardous special waste at the Waste Management Elk River Landfill in Elk River, MN. A copy of the waste profile and waste manifests are included in Attachment A. Analytical results of the waste characterization soil sample are included in Attachment B.

An "as-built" drawing showing the limits of excavation is included in Attachment C and photographs of the area taken before, during, and after construction activities are included in Attachment D.

Upon completion of all field work and disposal of generated soil, the field team demobilized on August 06, 2002.

Should you require additional information, please contact me at (216) 623-0402, ext. 13 at your convenience.

Sincerely,

CH2M HILL CONSTRUCTORS, INC.



B. Venky Venkatesh
Project Manager

cc: David Douglas, MPCA
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