



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

December 10, 2002

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Jeff Meyers, Code ES32
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Meyers:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled, "Performance of Additional Analyzes During the Pilot-Scale Operation of the Vegetable Oil Injection at the Anoka County Park Naval Industrial Reserve Ordnance Plant Fridley, Fridley Minnesota," (Standard Operation Procedures (SOPs)) enclosed in your letter to me dated November 1, 2003. The SOPs were 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.

There are 3 Standard Operating Procedures, one of which is not analytical in nature. This SOP was not reviewed. The following is the MPCA staff response to the other two SOPs.

AM20Gax

The AM20Gax SOP is very well written, but there are a few issues that need clarification.

Section 5.3.4, page six, last sentence

This section discusses the situation where when a sample analyte concentration exceeds the highest calibration standard, then the "...concentrations is calculated by assuming detector response linearity..." This situation can cause problems as this procedure may be inaccurate. Therefore, if a high concentration is found, be careful that this is a true number. The MPCA staff recommends flagging all data exceeding the highest standard concentration (of the curve).

There is no detailed discussion of sample preparation - which may have a lot to do with how the samples are taken. Include this discussion.

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Ensure all samples are spiked in this SOP (as well as the other SOPs). Microseeps may be spiking samples, but it was difficult to tell if Microseeps uses MS/MSD on all sample sets. (See Section 5.4.5).

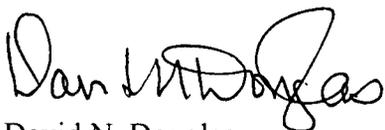
Microbial Insights, Inc.

The Microbial Insights, Inc. SOP is well written, but a few items are missing.

1. Identify at what levels the calibration standards are prepared.
2. Add a surrogate spike to this analysis to check for matrix effects.

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

Sincerely,



David N. Douglas
Project Manager
Superfund/RCRA
Superfund Unit 2
Majors and Remediation Division

DND:csa

cc: Gary Schafer, U.S. EPA
Venky Venkatesh, CH2MHILL