



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

December 19, 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 letter from Mark Sladic to you dated December 10, 2002 regarding the Remedial Action Work Plan. The letter is for Operable Unit 1 of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site was 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 (Navy).

The MPCA staff approves the Navy's responses to MPCA staff responses to Volume I, the Remedial Action Monitoring Plan. The MPCA staff approves the Navy's response to Volume II as modified by the Attachment to this letter. The MPCA staff requests that the Navy work directly with Luke Charpentier to resolve these remaining issues.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David N. Douglas".

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

DND:csa

cc: Gary Schafer, U.S. EPA (w/enclosures)
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosures)

Attachment I
Mark Sladic Letter
Regarding the Remedial Action Work Plan
Dated December 10, 2002

1. **Response to Comment 5:** The person who has overall responsibility for quality assurance for the site is still not identified. Identify this person. Reference the QA Manual.
2. **Response to Comment 18 Section B2.1:** Provide specific information on the particular field instruments to be used on the site. This also applies to the response to Comment 27, Section B7.1.3.
3. **Response to Comment 28, of Section B7.2:** Provide a description of how instruments are calibrated as this is still missing.
4. **Response to Comment 29, Section B8.2:** Provide a discussion of secondary data.
5. **Response to Comment 32, Section C1.2.1.2:** Identify the Navy website for the Data Quality Manual.
6. **Response to Comment 36, Section D2.1.2:** Remove "Check with Kelly" from the response.
7. **General Response:** The data-validation standard operation procedures (SOPs) were relatively well written but very general in nature. There are numerous references to the methods or "appropriate data validation protocol." This is ambiguous and confusing. (See Section 1.1.6.6 of CLP Organics.) The SOP itself should answer the specifics as to the validation methods. Be specific as to how data is validated, e.g., PCBs have no validation criteria beyond holding time, while pattern matching is a very important criteria for PCBs.