



# Minnesota Pollution Control Agency

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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

September 8, 2004

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

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Owens:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the "Anoka County Park Vegetable Oil Responses to Comments" ("MPCA Responses to Comments") attached to Venky Venkatesh's email message to me dated August 6, 2004. The Responses to Comments are for 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, and the U.S. Navy (Navy).

The MPCA staff hereby approves the MPCA Responses to Comments as modified pursuant to Attachment I of this letter. The MPCA staff commends Parsons for the thoughtful and enlightening responses to comments related to the many complicating factors and issues that were encountered in Phase I of the project, e.g., the addition of colloidal iron and magnetite to the injection wells and the unresolved hydrogeologic complexities regarding ground water flow encountered in the pilot study area.

The MPCA staff looks forward to working with the Navy in attempting to resolve unanswered questions about the pilot test in Phase II as the NIROP Partnering Team moves forward to further evaluate remedial options for Anoka County Park

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

Sincerely,



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

DND:csa

Enclosure

cc: Tom Smith, U.S. Environmental Protection Agency (w/enclosures)  
Venky Venkatesh, CH2MHILL Constructors, Inc. (w/enclosures)  
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosures)

## **Attachment I**

### **Modifications to “Anoka County Park Vegetable Oil Responses to Comments,”**

**Dated August 6, 2004**

#### **Items 23 and Bullet 5 of Item 29**

The MPCA staff requests that the Navy ensure that the tasks related to the Annual Monitoring Report be tasked out to the appropriate contractor for completion, e.g., that a contractor be tasked to determine how vertical gradients impact the flow regime in the pilot test area and how ground water travels vertically through the silt layer identified in the United States Geological Survey report.

#### **Item 55**

The MPCA staff requests that the Navy change the last sentence in the “Responses” column to read, “After the design data has been collected, the Navy will propose the design of Phase II to the NIROP Partnering Technical Subcommittee for the Technical Subcommittee’s evaluation. The Technical Subcommittee will make a recommendation to the Partnering Team for discussion and approval before the expanded pilot test commences.”