



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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CHICAGO, IL 60604-3590

N91192.AR.000730  
NIROP FRIDLEY  
5090.3a

REPLY TO THE ATTENTION OF:

SR-6J

May 4, 2005

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

Subject: Technical Review of the 2004 Annual Monitoring Report, March, 2005, Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota.

Dear Mr. Owens:

The United States Environmental Protection Agency, Region 5 (EPA) Federal Facilities Response Section has finished the Technical Review of the Annual Monitoring Report, March 2005, for the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota. The EPA's review of the 2004 Annual Monitoring Report (AMR) identified only a limited number of minor issues. These issues are minor and these should be easily resolved. If you have any questions, please call me at (312) 886-6450 or e-mail me at [smith.thomasl@epa.gov](mailto:smith.thomasl@epa.gov) and I will address your concerns as quickly as possible.

Sincerely,

A handwritten signature in black ink that reads "Thomas L. Smith".

Thomas L. Smith, LPG  
Remedial Project Manager

cc: David N. Douglas, MPCA  
Mark Sladic, Tetra Tech NUS, Inc  
Venky Venkatesh, CH2M Hill  
Laura Pugh, TechLaw  
Richard H. Kuhlthau, TechLaw

## SPECIFIC COMMENTS

1. Table of Contents, Acronyms, Pages 5 through 6: The list of acronyms does not appear to be complete. Examples of some acronyms that appear to be missing from the list are CAHs, COCs and EPA. For the purposes of aiding potential non-technical readers, it would be useful to provide a more complete list of acronyms in future submittals.
2. Section 1.5, Potential Source Areas, Page 7: In the first paragraph of Section 1.5, the text states that Figure 2-1 shows the locations of the source areas discussed in the nine bullets that follow. However, none of the source areas appear to be depicted on the figure. In any future submittals, revise the figure to depict the general locations of potential source areas.
3. Section 3.3, Extraction Wells and Pumps, Pages 2 through 5: Table 3-2 indicates that each of the extraction wells did not operate during the period from March 26, 2004 through May 4, 2004 due to computer system failure. This significant amount of downtime does not appear to be fully described in Section 3.3 where system interruptions are discussed. More detail is provided in Appendix B, but it would be helpful to have additional description of this event in Section 3.3. In addition, any recommendations for shortening the downtime due to this type of event should be provided.
4. Figures 4-31 and 4-32, Groundwater Concentration Maps, Intermediate and Deep Drift Groundwater Regimes, and Table 4-8, Detected Concentrations of VOCs, September 2004 Sampling Event: During an initial review of the groundwater concentration maps and Table 4-8, there appeared to be some inconsistencies between the maps and Table 4-8. Upon further inspection, it was determined that the results for duplicate samples were averaged before they were entered in Table 4-8. If this was the procedure used for generating Table 4-8, it should be described as a footnote to the table.

It would also be useful for the non-technical reader to define the "J" qualification on each of the groundwater concentration maps. Finally, it was noted that the dates provided for drawing and checking the map were from 2004, prior to the sampling event. These issues should be corrected for any future submittals.