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LETTER DISCUSSING NAVY'S SIGNIFICANT ACTIONS IN UPGRADING EXTRACTION AND  
TREATMENT SYSTEMS NIROP FRIDLEY MN  
11/17/2011  
NAVFAC MIDWEST



DEPARTMENT OF THE NAVY  
NAVAL FACILITIES ENGINEERING COMMAND  
MIDWEST  
201 DECATUR AVENUE, BUILDING 1-A  
GREAT LAKES, ILLINOIS 60088-2801

November 17, 2011

Mr. Kevin Alder, Chief  
Remedial Response Section #5, Superfund Division  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Dear Mr. Alder:

SUBJECT: U. S. Environmental Protection Agency Letter dated  
September 21, 2011, Naval Industrial Reserve Ordnance  
Plant, Fridley Minnesota

In reference to the September 21, 2011 Environmental Protection Agency (EPA) letter, I agree that the June 22, 2011 meeting between the EPA, Minnesota Pollution Control Agency (MPCA) and the Navy was a very productive. I appreciate the EPA's follow-up and acknowledge the EPA's and MPCA's continuing interest in the work being performed at the Naval Industrial Reserve Ordnance Plant (NIROP) in Fridley, MN.

Since December 2010, We have invested significant resources (approximately \$1.5M) into evaluating and upgrading the NIROP extraction and treatment system. Significant actions included:

1. Installation of a replacement well for AT-3A and the installation 2 of additional extraction wells and associated piping and instrumentation;
2. Upgrading of the piping network inside building 52/53 to accommodate the new wells and increase system reliability and ease of maintenance;
3. Upgraded the computer and control system;
4. Cleaned the primary conveyance lines between building 52/53 and the treatment area;
5. Engaged the USGS to develop a regional groundwater model. Note that the scope and schedule for this effort was previously provided to the Team. No interim submittals we planned, however, updates have been provided during Team meetings.

As we committed to in our September 9, 2010 letter; we completed one groundwater model (TtNUS model) and provided simulated runs for the new wells, to the Team. However, the Team decided to place this model on the on-hold and continue forward with the more robust USGS model. We have also completed

significant system upgrades. I feel we have met and exceeded the work intended in our September 9, 2010 letter to the EPA. System modifications, to date, will be documented in the final construction and pump test report and also documented in the next Annual Monitoring Report.

All current significant problems have been addressed at this time with aggressive mitigation actions underway. As discussed with the Project Team, additional system evaluations will continue to be made once the new wells are brought on-line and are functional. We are committed to ongoing system reviews and improvements in a proactive manner to ensure system functionality. This is consistent with typical large scale industrial systems.

At the June 2011 joint Tier II/I meeting, several goals and objectives were developed by the Three Parties along with projected schedules. I am committed to continue Partnering with the EPA and MPCA to achieve these goals in a reasonable manner and timeframe. It was also noted during the meeting discussions that the goals and objective have flexibility as do the projected schedules. The goals and schedules were developed to provide a guide and interim metrics to achieve the mutual overall goal of remediating the NIROP groundwater.

We concurred, during our June meeting, that a limited source investigation was likely needed to evaluate the long term affects of the current system and evaluate potential for alternate remedies. It was also agreed that the Project Team would begin working on the scope of the investigation this January, which we have begun. However, no set timeframe was specified for the investigation. With the current fiscal climate and the significant investment we made in FY11, it is likely that investigation funding will be available in the FY14/15 timeframe. However, our office will request, from higher headquarters, the funding as early as possible.

I appreciate your continued interest and we are dedicated to continuing our Partnering relationship in order to achieve our mutual goal mutual overall goal of remediating the NIROP groundwater in a reasonable manner and timeframe. Please contact me at 847.688.2600 x361 if you have any questions.

Sincerely,



Mark R. Schultz  
Environmental Director

Cc:

Thomas Short, Jr., Chief, Remedial Response Branch #2, U.S. EPA  
Region V

Mary Tierney, U.S. EPA Region V

Sandeep Burman, Minnesota Pollution Control Agency

Deepa DeAlwis, Minnesota Pollution Control Agency

Howard Hickey, NAVFAC MW

Harvey Pokorny, NAVFAC MW