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LETTER AND COMMENTS FROM THE MINNESOTA POLLUTION CONTROL AGENCY ON
THE THIRD FIVE-YEAR REVIEW REPORT NIROP FRIDLEY MN (PUBLIC DOCUMENT)
9/19/2008
MINNESOTA POLLUTION CONTROL AGENCY



Minnesota Pollution Control Agency

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September 19, 2008

Mr. Mark R. Schultz
Regional Environmental Coordinator
Naval Facilities Engineering Command
201 Decatur Avenue, Building 1A
Great Lakes, IL 60088-2801

RE: Naval Industrial Reserve Ordnance Plant Superfund Site Third Five Year Review

Dear Mr. Schultz:

As you know, at the present time the Minnesota Pollution Control (MPCA) is unable to concur with the protectiveness statement that the ground water remedy (OU1) is currently protective of human health and the environment:

- 1) The MPCA staff believes that the ground water remedy does not currently achieve the goal in the Record of Decision of total hydraulic containment of the contaminant plume.
- 2) The MPCA staff also suspects there are likely sources of trichloroethylene (TCE) under the NIROP building that have not been fully characterized.

We disagree with the Navy and the U.S. Environmental Protection Agency (U.S. EPA) on our position regarding hydraulic containment of the ground water plume. We understand that all parties have discussed additional investigation and remediation of sources under the NIROP building as part of a larger strategy to bring the remedial efforts to a closure. However, the MPCA is encouraged by the recent partnering efforts between the Navy, U.S. EPA, and the MPCA to assess the conditions at this site and to develop a plan that outlines what is needed to address the remaining environmental issues including:

- 1) maximizing the effectiveness of the existing pump and treat system;
- 2) monitoring the response of the ground water contaminant concentrations to changes in the remedial system;
- 3) analyzing remedial system and ground water data and come to consensus on what is needed to achieve the goal of hydraulic containment of the ground water plume; and
- 4) implement further corrective actions, if necessary.

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MPCA is committed to working with the Navy and the U.S. EPA toward accomplishing these goals in 2009 so we will all be able to concur that the ground water remedy is, or will soon be, fully protective of human health and the environment.

Sincerely,

A handwritten signature in cursive script that reads "Michael Kanner".

Michael Kanner, Manager
Superfund, RCRA and Voluntary Cleanup Section
Remediation Division

MK:ls

cc: Howard M. Hickey, Naval Facilities Engineering Command, Midwest
Mark Sladic, Tetra Tech, NUS
Rick Karl, U.S. EPA, Region 5
Tom Smith, U.S. EPA, Region 5
Gary Schafer, U.S. EPA, Region 5
Chris Catlin, Minneapolis Water Works, Fridley