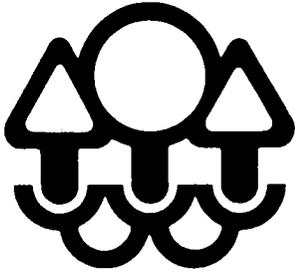


DES —



## Minnesota Pollution Control Agency

August 12, 1987

Mr. David Smith  
Northern Division  
Naval Facilities Engineering Command  
Code 114  
U.S. Navy Base  
Philadelphia, Pennsylvania 19112

Dear Mr. Smith:

The Minnesota Pollution Control Agency (MPCA) received the July, 1987 Preliminary Submittal of Feasibility Study Task #10 (Development of Alternatives) for the Naval Industrial Reserve Ordinance Plant (NIROP) in Fridley, Minnesota. This submittal is in response to Part II.A.6 and in partial fulfillment of Part II.B.1 of the May 22, 1984 Request for Response Action (RFRA) issued to the U.S. Navy by the MPCA. As we understand it, this submittal is a preliminary list of potential remedial action alternatives for the NIROP Site. The Feasibility Study required by Part II.B of the RFRA requires more in-depth analysis of potential alternatives including cost and feasibility comparisons and possible adverse environmental effects of the alternative technologies. MPCA staff comments on the submittal follow.

We agree with the conclusion that trichloroethylene (TCE) is the primary chemical constituent of concern. However, remediation technologies considered must demonstrate treatment for the other constituents also. It should be clearly shown that the proposed treatment technologies that work for TCE because of its physical/chemical properties also work for other constituents and their physical/chemical properties.

Additional field investigations have been deemed necessary at several locations on the NIROP Site (page 7). Some of the alternatives considered in the preliminary submittal will likely be applicable if other areas of contamination are found and the contaminants are similar to those already discovered.

As discussed on page 16, Resource Conservation Recovery Act (RCRA) rules may apply to excavated soil, as in Alternatives B and C, making it difficult, if not impossible, to replace treated soils in excavation areas.

Phone: \_\_\_\_\_

Mr. David Smith  
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As we understand alternatives G and H are designed only to protect the proposed Minneapolis Ranney well system, should it be installed, and not as a remedial technology in and of themselves.

Although ground water pumpout to a determined level has been proposed and accepted for the neighboring FMC Site, it should be noted that a site specific remediation alternative will be considered for NIROP that may not be identical to those at FMC. Ground water remediation is likely to require some type of permit(s)/approval from any or all of the following governmental units:

1. MPCA - surface water discharge
2. Minnesota Department of Health (MDH) - well design
3. Minnesota Department of Natural Resources (DNR) - water appropriation
4. Metropolitan Waste Control Commission (MWCC) - sewer discharge
5. City of Minneapolis
6. City of Fridley

Our experience with the FMC Corporation Response Action Plan (RAP) has shown that it takes some time to obtain all of the required permits. In addition, since the FMC RAP will utilize the sanitary sewer, proposed future discharges to the sanitary sewer from a chosen remedial action at NIROP may require special considerations to accommodate the MWCC.

The preliminary submittal covers those remediation technologies which we feel are appropriate and should be considered at this time. Future actions, the additional field investigations for example, and any new technologies may require additional consideration. Please contact me at (612) 297-1806 if you have any questions or comments.

Sincerely,



Mark Lahtinen  
Project Manager  
Responsible Party Unit I  
Site Response Section  
Solid and Hazardous Waste Division

ML:kh

cc: Thomas Thiele, U.S. Army COE  
Eric Gredell, RMT, Inc.