



Minnesota Pollution Control Agency

March 23, 1988

Mr. Eric Gredell, P.E.
Project Manager
RMT, Inc.
Suite 124
1406 East Washington Avenue
Madison, Wisconsin 53703

Dear Mr. Gredell:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the Draft Feasibility Study (FS) Report submitted in December 1987 for the Naval Industrial Reserve Ordinance Plant (NIROP) Site in Fridley, Minnesota. MPCA staff comments on the Draft FS are below:

Page 1-3 - It should be mentioned here that the alternatives will also be evaluated as to how they meet potential human health or environmental criteria or standards for the contaminants such as Recommended Allowable Limits (RAL) for drinking water established by the Minnesota Department of Health or U.S. Environmental Protection Agency Maximum Contaminant Levels (MCLs).

Table 2.2 and Page 2-35 - The presence of polychlorinated biphenyls (PCB's) at low levels in ten of the monitoring wells is disturbing to us. Some of the alternatives, e.g., air stripping, will not provide PCB treatment and they can't be discharged to surface water. PCB's should be routinely monitored in the future to affirm no action for the PCB's.

Page 2-34 - Since selenium was detected above the MCL selenium should be routinely monitored in the future to keep track of it.

Page 2-35 - Future routine analyses should also be performed for benzene, 1,2-Dichloroethylene (DCE) and tetrachloroethylene (PCE) to monitor their presence and movement even though trichloroethylene (TCE) is the main contaminant of concern.

Page 2-40 - Although the TCE concentration in the Prairie du Chien-Jordan (PdC) monitoring wells has decreased over time the mean concentration is still significant. Future monitoring is necessary to see if the TCE concentrations are declining, stabilizing or increasing in the PdC.

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Mr. Eric Gredell, P.E.
Page Two

Page 2-48 - Available data from wells 3-D, 4-S and 20-S would seem to indicate that the TCE observed in 9-S is limited to a relatively narrow plume of high local concentration and not a result of multiple sources outside the area around 9-S.

Page 3-32 - Bottom of page, - FMC pumpout is to the sanitary sewer, not the storm sewer.

Page 3-33 - The assumed ground water contaminated layer thickness of 30 feet could be 100 feet if the entire unconsolidated saturated thickness is in the plume as at wells 18S and 8D.

Page 4-11 - Alternative D - In Situ Vacuum Extraction may require additional treatment such as granular activated carbon to meet Air Quality discharge criteria.

Table 5-2 - SDS Permit is State Disposal System permit, not Subsurface Disposal System.

Please contact me at (612) 296-7775 if you wish to discuss this further or if you wish to discuss the more recent submittals for the NIROP Site.

Sincerely,



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

ML:kh

cc: Mr. David Smith, U.S. Navy
Mr. Tom Thiele, U.S. Army COE