



RMT, Inc.
744 Heartland Trail
P.O. Box 8923
Madison, WI 53708-8923
Phone: 608-831-4444
FAX: 608-831-3334

April 15, 1992

Mr. James Shafer
Naval Facilities Engineering Command
U.S. Naval Base - Northern Division
Building 77L; Code 1421
Philadelphia, PA 19112

Re: Naval Industrial Reserve Ordnance Plant
Fridley, Minnesota
Contract No. N62472-90-C-1024; Amendment No. 2
RMT Project No. 2313.08

Dear Jim:

Enclosed, for your use, are two copies of the final notes from Technical Review Committee Meeting #13, held at the Naval Industrial Reserve Ordnance Plant on March 19, 1992. Other copies of these notes have been distributed according to the attached Distribution List.

Sincerely,

A handwritten signature in cursive script that reads "Eric Gredell".

Eric Gredell, P.E.
Project Manager

jld

Enclosure

2313.08 0000:MSA:shafer

**DISTRIBUTION LIST
MEETING NOTES
TRC MEETING #13**

	<u>Number of Copies</u>
U.S. Army Corps of Engineers Omaha District Attn: CEMRO-ED-ED-2 (John Japp) 215 North 17th Street Omaha, NE 68102-4978	2
City of Fridley Department of Public Works Fridley Municipal Center Attn: Mark Winson 6431 University Avenue, N.E Fridley, MN 55432	1
Naval Facilities Engineering Command Attn: James Shafer - Code 1421 U.S. Naval Base - Northern Division Building 77 L Philadelphia, PA 19112	2
Defense Plant Representative Office FMC-Minneapolis Attn: NAVSEA Technical Representative-Dick Hanson 4800 East River Road Minneapolis, MN 55421-5094	1
Naval Sea Systems Command Attn: Steven Hoffman CSEA 654-C Washington, DC 20362-5101	1
Minnesota Pollution Control Agency Site Response Section Ground Water and Solid Waste Division Attn: John Betcher 520 Lafayette Road St. Paul, MN 55155	1
U.S. Environmental Protection Agency Region V Remedial & Enforcement Response Branch OH/MN Section, Unit 1 (HSRM-6J) Attn: Tom Bloom 77 W. Jackson Blvd. Chicago, IL 60604-3590	1

**DISTRIBUTION LIST
MEETING NOTES
TRC MEETING #13**

	<u>Number of Copies</u>
FMC Corporation Attn: Doug Hildre 4800 East River Road Minneapolis, MN 55421	1
Metropolitan Waste Control Commission Attn: Leo H. Hermes, P.E./Michael Pliml, P.E. Mears Park Centre 230 East 5th Street St. Paul, MN 55101	1
Environmental Services Anoka County Courthouse Attn: Robert Hutchison, Director 325 East Main Street Anoka, MN 55303	1
Minnesota Department of Natural Resources Attn: Mr. Evan Drivas 500 Lafayette Road St. Paul, MN 55115	1
Minneapolis Water Works Attn: Mr. Adam Kramer 4300 Marshall Street NE Minneapolis, MN 55421	1
Defense Plant Representative Office FMC-Minneapolis Attn: Commander Daniel Hogan 4800 East River Road Minneapolis, MN 55421-5094	1
FMC Corporation Attn: Diane Maki 4800 East River Road Minneapolis, MN 55421	1
B&V Waste Science & Technology Corp. Attn: Margaret Casserly 230 West Monroe St.; Suite 2250 Chicago, IL 60606	1
Naval Facilities Engineering Command Attn: Michael Ioff-Code 4051 U.S. Naval Base-Northern Division Building 77L Philadelphia, PA 19112	1

**Minutes of Meeting
Technical Review Committee Meeting #13
March 19, 1992**

**Naval Industrial Reserve Ordnance Plant
Fridley, Minnesota**

Technical Review Committee (TRC) meeting #13 was held at the Naval Industrial Reserve Ordnance Plant (NIROP) in Fridley, Minnesota, on March 19, 1992. A copy of the agenda distributed at the meeting and an attendance list are attached.

A. Introductions

1. Keith Lura opened the meeting at approximately 1:00 p.m.
2. There were no comments on the notes for TRC meeting #12.
3. Gary Eddy announced that Cindy Kahrmann is transferring to the MPCA Air Quality Division, as of April 8, 1992. A replacement project manager has not been assigned at this time. John Betcher will function as the MPCA project manager in the interim.

B. Actions Since Last TRC Meeting

1. Construction Status

Mark Koenig gave a summary of construction status for the groundwater extraction system. The four extraction wells have been installed. The well pumps are scheduled to be ready for factory testing by March 27, 1992. After testing, the pumps will be delivered to the site and installed. The pumps will be fitted with motor shrouds. The USACE is considering adding pressure regulating valves to the discharge line of each well, as recommended by the USACE's construction contractor. All monitoring wells have been installed. The electrical power wiring to well AT-3A will be replaced with larger wiring, to accommodate the larger motor horsepower for the pump as ordered. The construction contract is expected to be completed by the end of April 1992.

The USACE ordered the well pumps based on the flow rates and other specifications recommended by their construction contractor, Morrison-Knudsen (M-K), except for well AT-4. For AT-4, the USACE selected a design flow rate that was lower than the rate recommended by M-K. The total expected flow rate from the 4 wells is 525 gpm.

2. Groundwater Re-use Study

Jim Shafer reported that the Groundwater Re-use Study report was issued by the Navy. Review comments were received only from the MDNR. The Navy recently received a telephone call from the plant engineer at Quebecor Printing Corporation; this company is still interested in purchasing treated groundwater from the Navy for use as cooling water. The Navy will continue to pursue this possible re-use option. After a suitable amount of operating data and experience has been gained for the

treatment facility, the Navy will reconsider re-use of treated groundwater as a supplemental water supply to the City of Fridley municipal water system.

Doug Hildre mentioned that some groundwater from the Phase I groundwater extraction system operation can be used in the NIROP as cooling water. The groundwater does not require treatment prior to use, since it will only be used as non-contact cooling water. He also mentioned that at the FMC groundwater extraction system located south of the NIROP, problems with scaling and plugging were encountered due to iron bacteria.

Evan Drivas asked if it would be necessary to amend the ROD to address re-use of groundwater. It was agreed that the ROD does not need to be amended, because the discharge point for extracted groundwater during Phase I is still the sanitary sewer, as specified in the ROD. However, Tom Bloom will check this, and will advise the Navy if the USEPA foresees any problems.

A copy of the Groundwater Re-use Study report will be placed in the public information repository. The Navy will issue a letter to the MDNR, the USEPA, and the MPCA stating that the report is considered final.

3. Remedial Investigation for Soil

Jim Shafer stated that the responses to the Agencies' comments on the Draft-Final Soil RI Workplan were submitted to the Agencies on March 10, 1992. The Draft Workplan was issued on January 24, 1992. John Betcher said he believed that Cindy Kahrmann had completed her review. The MPCA does not have further comments. Tom Bloom informed the group that the Region V Quality Assurance Section (QAS) will not review the responses to comments on the QAPjP until the responses are submitted as revised pages. QAS cited Inspector General audit requirements as the reason for insisting on this format. In order to expedite the final QAPjP review and approval process, Tom Bloom agreed to handwrite revisions on QAS's Draft-Final QAPjP, request a 7-day review by QAS, then notify the Navy and RMT of the acceptability of the proposed revisions. He also said that it is not uncommon for a draft QAPjP to be revised 3 to 4 times before QAS approval is given. Linda Hicken said that RMT would revise and resubmit the appropriate pages after QAS has agreed to the content of the changes.

Tom Bloom and Gary Eddy said that the Agencies plan to issue a joint letter of approval of the RI Workplan as soon as QAS approves the QAPjP.

Linda Hicken noted that the date of Workplan approval is important because the Federal Facility Agreement (FFA) for the NIROP Fridley requires that the RI Report be submitted within 365 days after Workplan approval.

Linda Hicken reported that the Navy and RMT are developing a contract to implement the soil RI and prepare the RI Report. She noted that fieldwork is anticipated to start on about May 18 and continue through mid-July, contingent upon timely QAPjP approval.

Linda Hicken described the general approach for performing the soil RI fieldwork as follows:

- The background soil borings will be drilled first, followed by the Type 1 soil borings and test pits which will be completed in areas of known or suspected contamination. A field gas chromatograph will be used to provide a preliminary characterization of soil contamination.
- Based on the field data from the Type 1 borings and test pits, the number and locations of Type 2 borings needed to determine the extent of contamination will be recommended by RMT, with review and approval by the Navy.

Linda Hicken requested Agency clarification of the expected scope of the Baseline Risk Assessment, specifically, whether or not the groundwater and surface water pathways should be considered. She noted that the soil RI does not include any surface water or sediment sampling and analysis that would be needed to quantify the risks associated with the surface water pathway. Tom Bloom agreed to discuss this issue with the Region V Risk Assessment Group. Tom thought that the groundwater pathway was already being adequately addressed. It was agreed that, for the purpose of scoping the risk assessment as part of RMT's contract with the Navy, it would be assumed that the groundwater and surface water pathways would not be considered as potential contaminant migration pathways. It was noted that the Baseline Risk Assessment included in the RI Report for groundwater was prepared before the NIROP was placed on the National Priorities List of sites.

4. Permits for Groundwater Remedial Action

No information was available on the status of the NPDES permit application. The application is still under review by the MPCA.

No information was available on the status of the MWCC permit. It is not known if the permit application has been submitted to the MWCC by the USACE.

The Groundwater Appropriation Permit application is under review by the MDNR. The Navy will provide copies of as-built drawings for the groundwater extraction wells to the MDNR.

The air discharge from the interim air stripping system must be treated to remove VOCs, according to MPCA air emissions policy.

5. Operation and Maintenance Plan

Tom Bloom said it is important to coordinate the contents of the portions of the Operation and Maintenance (O&M) Plan being prepared separately by the USACE and RMT, to be sure that the USACE Plan includes all required details.

The topic of the types of modifications to the groundwater extraction system which would necessitate a formal revision of the O&M Plan was discussed. It was noted that the O&M Plan defines certain events or conditions which would not require revision of the Plan. It was agreed that it would not be necessary to use a formal process for revising the O&M Plan if minor changes are made which are consistent with the minimum requirements of the Plan. All review comments on the draft O&M Plan have been received. The final Plan is expected to be issued during the week of March 23, 1992; written responses to review comments on the draft Plan will be issued with the final Plan.

6. Groundwater Flow Model

It was mentioned that a meeting was held on February 26, 1992, at RMT, with representatives of the Navy, the MPCA, the USEPA, and RMT, to discuss status of the groundwater flow model. John Betcher suggested that a meeting be held before startup of the groundwater extraction system to check calibration of the model. The Navy will schedule a meeting at the NIROP shortly before startup, to discuss the flow model and other topics related to startup coordination.

7. Interim Groundwater Pretreatment

Eric Gredell said that since the last TRC meeting, the basis for RMT's previous recommendation for providing interim groundwater pretreatment has changed. The previous recommendation to provide liquid-phase granular activated carbon (GAC) treatment for the time period from startup of the groundwater extraction system until a new on-site treatment facility is operational has been revised. The recommendation for liquid-phase GAC was based on the estimated flow rates and groundwater VOC concentrations defined in the final design documents for the extraction system. The estimated flow rates have changed substantially, based on results from groundwater pumping and groundwater sampling tests performed by the USACE in early 1992. Based on the revised design conditions, the recommended alternative for providing interim groundwater pretreatment is to use the existing air stripping system installed by the USACE for use during their pumping tests, and add gas-phase GAC treatment equipment for the exhaust air from the stripping column. This alternative is estimated to be substantially lower cost than using liquid-phase GAC treatment. Only the discharge from well AT-3A would be treated; the treated water would be combined with the untreated flow from the other 3 wells and discharged to the MWCC sanitary sewer.

8. Remedial Action Workplan

A final draft of the Remedial Action Workplan (RAWP) has been submitted to the Navy and USACE. Review comments are expected to be received by RMT within about two weeks. After addressing the Navy and USACE review comments, and review comments previously received from the MPCA and USEPA on the draft Workplan components, the RAWP will be finalized and issued. Written responses to USEPA and MPCA review comments on the draft RAWP components will be included with the final RAWP.

C. Actions for Next Quarter

1. A schedule for design of the Groundwater Treatment Facility (GWTF) was distributed (copy attached). Jim Shafer said that the FFA lists design submittals at 30%, 60%, 90%, and 100% completion. With all of the allowed review times and submittals provided in the FFA, it was estimated that the design would not be completed until approximately October 1995. In the interest of reducing the design schedule, the USEPA has agreed to eliminate one of the design submittals. In addition, to expedite the start of design, the USEPA has agreed that if the groundwater extraction system is found to be ineffective in the Determination Document submittal, the Determination Document will also include the Navy's proposed plan for upgrading the extraction

system. The USEPA also agreed that if upgrading is needed, the construction would be done concurrently with construction of the on-site GWTF.

Jim Shafer mentioned that the Navy's preferred procedures are to review a draft submittal and have their comments addressed before the submittal is provided to the USEPA and MPCA for review. However, to expedite the overall design schedule, the Navy is willing to shorten their review time, and complete their review concurrently with review of the submittal by the USEPA and MPCA. The Navy intends to review each submittal for only 2 weeks prior to sending the submittal to the USEPA and MPCA. The Navy asked the agencies to consider shorter review times than allowed by the FFA.

It was noted that even with these expedited design procedures, it is possible that the deadline for completing design of the GWTF within 365 days after the USEPA and MPCA approve the groundwater extraction system, as defined in the ROD, may not be met.

D. RCRA Status

1. FMC has received comments from the MPCA on a revised Closure Plan for former Hazardous Waste Storage Area C. In the revised Closure Plan, FMC proposed to install a soil vapor extraction (SVE) system at Area C. The design of the SVE system must be completed soon, so construction can be done concurrently with another environmental construction project scheduled for this summer. FMC has hired a contract designer for the SVE system; the design will start next week and will be finished by mid-April 1992. MPCA approval of the Closure Plan is needed by May 19, 1992, to avoid delays in construction of the SVE system, which is scheduled to be done from August to November 1992.
2. FMC's preferred plan for Area C closure is to install all required SVE wells and related equipment, perform pilot tests, and upgrade the system if found to be necessary. This approach was proposed because the stratigraphy is well defined and the closure area is relatively small. However, the MPCA prefers a phased construction plan whereby only temporary test SVE wells are initially installed, tests are run, then the full SVE system is installed. In their responses to MPCA comments, FMC will propose their preferred approach vs. the approach described by the MPCA. FMC's responses will be submitted in approximately 1 month.
3. FMC also proposed to operate the SVE system for 2 years, then collect and analyze soil samples to determine concentrations of residual contaminants. If residuals are still found, a risk assessment would be performed. The Baseline Risk Assessment being prepared for the soil RI will be used by reference, if available. If it is not available, a risk assessment specific to Area C will be prepared. The risk assessment would be used to determine the need for further remediation. The MPCA RCRA Section wants the SVE system to be operated until the practicable extent of cleanup is reached, regardless of time. Under FMC's approach, the SVE system would continue to be operated after 2 years only if the risk assessment showed that an unacceptable risk level remained.
4. Tom Bloom and Gary Eddy commented that, because of the differences between CERCLA and RCRA, the clean-up level for Area C may be different than for areas

included in the RI. They agreed, however, that the clean-up level for Area C would not set a precedent for the soil RI/FS work. However, Jim Shafer suggested that clean-up criteria for the NIROP Fridley be consistent under RCRA and CERCLA.

5. Gary Eddy noted that the MPCA is developing guidelines for soil clean-up levels for state superfund sites. These guidelines will not be promulgated as rules. They would be To-Be-Considered criteria for NPL sites, not Applicable or Relevant and Appropriate Requirements. They would be applied similar to Recommended Allowable Limits for groundwater quality. There is no schedule for publishing these guidelines.
6. Steve Hoffman requested that resolution of issues related to Area C be accelerated to take advantage of the availability of FY92 funding.
7. Doug Hildre said that soil stockpiled in the north 40 will also be addressed with Area C closure work. However, any soil excavated from Area C will be stockpiled and managed separately from the existing stockpile. The volume of soil from the storm sewer construction is approximately 1,500 cy. FMC's preferred schedule is to proceed with stockpile management fieldwork in July or August 1992.

He said that for land application of contaminated soil in Anoka County, the County Board of Directors must approve the action. He said that FMC has issued a public notice that soil from a storm sewer construction project has been stockpiled, and is intended to be land-spread. Mark Winson said that Fridley does not require a city permit to land-spread contaminated soil. However, he will check whether any type of approval is needed from the Fridley City Council.

Doug Hildre said that FMC will collect samples from the soil stockpile from the storm sewer construction project. These samples will be analyzed for the TCL and TAL; however, Superfund (CLP) laboratory methods will not be used. Management of this soil is being handled as a removal and disposal action, not as part of the Superfund process. If concentrations of constituents in the soil stockpile are found to be above action levels, FMC will notify the Navy.

G. Community Relations

1. The Navy will issue a Fact Sheet announcing the soil RI fieldwork and startup of the groundwater extraction system. The Navy will consult with the MPCA public relations staff regarding the appropriate time to issue the Fact Sheet. It was agreed that it should be issued only after the startup period for the extraction system has been successfully completed.
2. Tom Bloom said that the USEPA may conduct some form of public announcement ceremony at the NIROP, for startup of the extraction system. The USEPA-Region V Administrator may participate in the ceremony.
3. The USEPA and Navy have agreed that the Community Relations Plan (CRP) does not need to be revised to address the soil RI. The Navy will issue a letter-type addendum to the CRP, probably toward the end of 1992, to address the soil RI. It was agreed that this addendum would satisfy the FFA requirement to update the CRP each year if there have been any noteworthy actions in the previous calendar year.

F. General Topics

1. Jim Shafer said that as of the end of FY 93 (October 1, 1993), the Northern Division (NORTHDIV) of the Naval Facilities Engineering Command will not manage environmental restoration projects for Navy activities west of Pennsylvania. As of October 1, 1993, the responsibility for these projects, including the NIROP Fridley, will be transferred to the Southern Division (SOUTHDIV) of the Naval Facilities Engineering Command, in Charleston, South Carolina. However, NORTHDIV will continue to manage the groundwater operable unit at NIROP Fridley through completion of design for the on-site GWTF. At that point, the project will be turned over to SOUTHDIV.

For the soil RI, NORTHDIV will continue to manage the RI, through completion of the RI Report. At that point, the operable unit for the outside soil RI/FS will be turned over to SOUTHDIV. The Navy will develop a transition plan for the transfer of the NIROP Fridley project from NORTHDIV to SOUTHDIV.

2. The Navy will notify the designated MPCA project manager regarding all subsequent project meetings, etc. The MPCA project manager will be responsible for notifying other MPCA staff as necessary. The MPCA RCRA staff will be requested to attend the next TRC meeting, by the MPCA project manager.
3. Jim Shafer noted that the NAVSEA is the owner of the NIROP Fridley. All decisions regarding re-use of treated groundwater, etc., must be made through a set Navy chain-of-command. Mr. Shafer clarified that he functions as the Navy's coordinator for the project.
4. Gary Eddy said that Adam Kramer will be personally contacted by the MPCA at the start of the public comment period for the draft NPDES permit modification.
5. The next TRC meeting is scheduled for **Thursday, June 11, 1992, at 10:00 a.m.** in the Defense Plant Representative Office at the NIROP Fridley.

TECHNICAL REVIEW COMMITTEE (TRC) MEETING

19 MARCH 1992

NIROP FRIDLEY, MINNESOTA

LIST OF ATTENDEES: EXPECTED (See attached sign-in sheet for actual list of attendees)

<u>NAME</u>	<u>ORGANIZATION</u>
Jeffrey Ciocco	NORTHDIVNAVFAC
James Shafer	NORTHDIVNAVFAC
John Betcher	MPCA
Gary Eddy	MPCA
Cynthia Kahrmann	MPCA
Doug Hildre	FMC/NSD
Darlene Weber	FMC/NSD
Mark Winson	City of Fridley
Robert Hutchinson	County of Anoka
John Dresch	DPRO FMC Minneapolis
Keith Lura	DPRO FMC Minneapolis
Sue Oetterer	DPRO FMC Minneapolis
Jeff Allison	NAVSEA
Richard Hanson	NAVSEA
Steve Hoffman	NAVSEA
Kerry Morrow	NAVSEA
Eric Gredell	RMT, Inc.
Linda Hicken	RMT, Inc.
Adam Kramer	Minneapolis Water Works
Mike Pliml	MWCC
Thomas Bloom	USEPA
Margaret Casserly	Black and Veatch
Evan Drivas	DNR

AGENDA:

1. INTRODUCTION
2. ACTIONS SINCE LAST TRC MEETING
 - * CONSTRUCTION PROGRESS FOR PHASE I
 - * GROUNDWATER REUSE STUDY - FINALIZED
 - * RIWP SOILS OPERABLE UNIT - FINALIZED
 - * PERMITS
 - NPDES
 - MWCC
 - GROUNDWATER APPROPRIATIONS
 - AIR
3. ACTIONS SCHEDULED FOR NEXT QUARTER
 - * PHASE I REMEDIAL ACTION WORK PLAN
 - * PHASE I OPERATIONS & MAINTENANCE PLAN
 - * GROUND WATER MODELING
 - * PRE TREATMENT FOR PHASE I
 - * PHASE 2 DESIGN - PROPOSED SCHEDULE
 - * FIELD WORK FOR SOILS OPERABLE UNIT
 - * AREA C RCRA SITE
 - * COMMUNITY RELATIONS
 - SYSTEM START UP
4. OTHER ISSUES ?

TECHNICAL REVIEW COMMITTEE (TRC) MEETING
 19 MARCH 1992
 NIROP FRIDLEY, MINNESOTA
LIST OF ATTENDEES:

<u>NAME</u>	<u>ORGANIZATION</u>	
Jeffrey Ciocco	NORTHDIVNAVFAC	<i>Jeffrey Ciocco</i>
James Shafer	NORTHDIVNAVFAC	<i>James Shafer</i>
John Betcher	MPCA	<i>John Betcher</i>
Gary Eddy	MPCA	<i>Gary Eddy</i>
Cynthia Kahrmann	MPCA	
Doug Hildre	FMC/NSD	<i>Doug Hildre</i>
Darlene Weber	FMC/NSD	<i>(present, part-time)</i>
Mark Winson	City of Fridley	<i>Mark Winson</i>
Robert Hutchinson	County of Anoka	
John Dresch	DPRO FMC Minneapolis	<i>John Dresch</i>
Keith Lura	DPRO FMC Minneapolis	<i>Keith Lura</i>
Sue Oetterer	DPRO FMC Minneapolis	<i>Sue Oetterer</i>
Jeff Allison	NAVSEA	<i>Jeff Allison</i>
Richard Hanson	NAVSEA	<i>Richard Hanson</i>
Steve Hoffman	NAVSEA	<i>Steve Hoffman</i>
Kerry Morrow	NAVSEA	<i>Kerry Morrow</i>
Eric Gredell	RMT, Inc.	<i>Eric Gredell</i>
Linda Hicken	RMT, Inc.	<i>Linda E. Hicken</i>
Adam Kramer	Minneapolis Water Works	<i>(present, but did not sign-in)</i>
Mike Pliml	MWCC	
Thomas Bloom	USEPA	<i>Thomas Bloom</i>
Margaret Casserly	Black and Veatch	<i>M. Casserly</i>
Evan Drivas	DNR	<i>Evan Drivas</i>

ADD IR NOT ~~BE~~ LISTED
 MARK KOENIG

LOE - ST PAUL DIST

Shelley Klabsch FMC/NSD
Bob Halverson FMC/NSD

Estimated Project Schedule - Supporting Information
March 19, 1992

Assumed Task Durations

- USEPA/MPCA review of Determination Document: 30 days, per ROD
- Discuss and resolve USEPA/MPCA comments on Det. Document: 2 weeks
- Topo. survey, soil borings, etc.: 2 weeks
- Bench-scale testing: 1 week in field (done concurrently with topo. survey, etc.)
- Process development: 6 weeks
- Prepare Schematic Submission: 4 weeks (overlaps process development by 2 weeks)
 - Review by USEPA/MPCA: 30 days (per FFA)
 - Responses to review comments: 45 days (per FFA)
- Prepare Design Development Submission: 2 months
 - Review by USEPA/MPCA: 30 days (per FFA)
 - Responses to review comments: 45 days (per FFA)
- Prepare Final Submission: 14 weeks
 - Review by USEPA/MPCA: 30 days (per FFA)
 - Responses to review comments: 45 days (per FFA)
- Prepare Bid Documents Submission: 4 weeks

Notes:

1. Assumes no extensions to base review periods allowed by FFA and ROD.
2. Assumes any construction needed to upgrade the initial groundwater extraction system will be done during construction of the longer-term, on-site groundwater treatment facility.
3. Assumes concurrent review of all design submittals by the Navy, USEPA, and MPCA, with internal Navy review starting two weeks before USEPA and MPCA reviews begin.