

August 23, 1994

Mr. Doug Hildre
United Defense LP
Armament System Division
4800 East River Road
Minneapolis, MN 55412

RE: Responses to comments for the NIROP Alternative Array Document

Dear Mr. Hildre:

In regard to your July 10, 1994, telephone conversation with Ms. Kathy Huibregtse regarding comments on the Draft Alternative Array Document (AAD), RMT, Inc. (RMT), has prepared the following responses:

Comment 1:

Subsection 2.1, first paragraph: Change Northern Ordnance Division to Armament Systems Division of United Defense LP.

Response 1:

Northern Ordnance Division has been changed to Armament Systems Division of United Defense LP (United Defense), formerly Northern Ordnance Division of FMC Corporation.

Comment 2:

Subsection 2.1, second paragraph: Change FMC to United Defense.

Response 2:

FMC has been changed to United Defense.

Comment 3:

Subsection 2.1, fifth paragraph: Check distance to water intake.

Response 3:

Based on your comment, we checked Figure 1-1 in the RI. It appears that the City of Minneapolis Waterworks facility is approximately 2,000 feet south of NIROP.

Comment 4:

Subsection 2.4, first paragraph: Change the term soil tunnels to subsurface tunnels.



RMT, Inc. — MADISON, WI
744 HEARTLAND TRAIL = 53717-1934
P.O. Box 8923 = 53708-8923
608/831-4444 = 608/831-3334 FAX

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Response 4:

The sentence has been changed and now reads "These were: 1) incidental ingestion, dermal adsorption and inhalation of soil particles, and 2) inhalation of VOCs by workers in subsurface structures such as tunnels and basements, through pore gas migration.

Comment 5:

Table 1: Note that the entire site is a major source - how does this impact Table 1.

Response 5:

Comment noted. The need for air permit modifications for the site will be investigated during the FS.

Comment 6:

Table 2: Note that for thermal desorption, the particulate threshold is 25 lbs/year.

Response 6:

Comment noted.

Comment 7:

Subsection 4.3, fourth paragraph: Include particulate reference with action specific ARARs.

Response 7:

The fourth paragraph has been changed and now reads "Action-specific state ARARs identified beyond the federal regulations include VOC air emission requirements, particulate emission requirements, and off-site transportation of hazardous waste (if appropriate).

Comment 8:

Subsection 6.2.4: Eliminate the last part of the second sentence.

Response 8:

Based on your comment, the last part of the second sentence has been removed.

Comment 9:

Subsection 6.3.3, fourth paragraph, second sentence: Change from grassy to gravel.

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Response 9:

Based on your comment, grassy has been changed to gravel.

Comment 10:

Note that MACT standards may need to be considered.

Response 10:

Comment noted.

A copy of the red-lined final version of the AAD, which includes your comments above, plus the comments provided by EPA, Halliburton NUS Corporation, MPCA and the Navy, is attached.

Doug, if you have any further questions or comments, please give me a call at 414-798-9550 or Linda Hicken at 608-831-4444.

Sincerely,



Mark Briggs
Task Manager

amg

Attachment