

Minnesota Pollution Control Agency

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 7, 1994

Mr. David Cabiness, Code 1862
Commanding Officer
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Dear Mr. Allison:

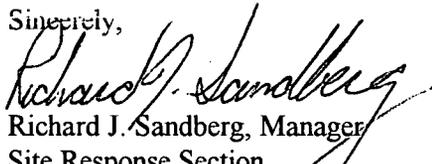
RE: Naval Industrial Reserve Ordnance Plant Site

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the U.S. Navy's (Navy) letter entitled "Proposed Exceedance Control Plan to Lower Air Emission Rate at Naval Industrial Reserve Ordnance Plant (NIROP) Fridley," (Plan) dated June 19, 1994. The Plan was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the Navy.

The MPCA staff hereby approves the Plan with modifications contained in the attachment to this letter.

If you have any questions regarding this letter, please contact David Douglas of my staff at (612) 296-7818.

Sincerely,



Richard J. Sandberg, Manager
Site Response Section
Ground Water and Solid Waste Division

RJS:rml

Enclosure

cc: Sidney Allison, Navy, Southern Division
Linda Hicken, RMT, Inc.
Thomas Bloom, United States Environmental Protection Agency, Region V

Attachment

Proposed Exceedence Control Plan to Lower Air Emission Rate at Naval Industrial Reserve Ordnance Plant, Fridley Minnesota - June 19, 1994.

The Air Exceedence Control Plan changes the analytical sampling protocol to measure air emission rates (AERs) after the carbon air polishing at the Phase I Treatment air stripper at Naval Industrial Reserve Ordnance Plant (NIROP). The plan is approved with the following modifications to Attachment 2 of Part 1 of Revision 2 of the document entitled, "Remedial Action Workplan for Groundwater Remediation at the Naval Industrial Reserve Ordnance Plant [NIROP]" - Monitoring Controlled Air Stripper Emissions at NIROP, (RAWP, Revision 2), dated September 1992:

ITEM 1. - Analytical sampling of air stripper exhaust trichloroethene (TCE) levels shall be performed monthly until a record of carbon changeout is established which indicates that the carbon changeout can be accomplished without AER exceedences.

On a semiannual basis, the Navy shall analyze exhaust scrubber air for all possible volatile organic compounds (VOCs). The sampling shall occur during the month predicted for carbon changeout, prior to carbon changeout, or in the month preceding the predicted carbon changeout time (see paragraph 5 below).

The Navy shall analyze the air scrubber exhaust gases by total organic vapor analysis (OVA) every other week to determine the concentration of total organic vapor in the exhaust air. The OVA meter will utilize both photo ionization (PID) and flame ionization (FID) measurements. The OVA data shall be compared to the monthly analytical results to establish any correlation that may exist between the analytical and OVA measurements. Both sets of data (PID/FID and Method 18 results) and the correlation charts shall be provided to the MPCA staff to substantiate the correlation.

The Navy shall, with the assistance of the carbon vendor, determine a carbon consumption rate using a mass balance evaluation of the average loading rate of VOC compounds from the ground water pumpout effluent to the air stripper exhaust air treatment system. The VOC loading rate shall be compared to the carbon capacity to attempt to predict the length of time that the carbon can be utilized before breakthrough occurs. A changeout schedule which incorporates a conservative changeout schedule to prevent AER exceedences shall be determined from the loading evaluation. A second such evaluation shall occur after the system upgrade is accomplished and the amount of additional loading is determined from the two new pumpout wells.

ITEM - 2. - Air Quality samples may be sampled and analyzed for TCE using U.S. Environmental Protection Agency (EPA) Method 18 on a monthly basis. On a semiannual basis Method 18 shall be performed on exhaust scrubber gases for all VOC compounds. In addition, EPA Method 106 shall be used to determine vinyl chloride levels for the full VOC testing.

All other existing provisions of the above referenced document which pertain specifically to monitoring controlled air stripper air emissions at NIROP shall remain in effect.