

# Minnesota Pollution Control Agency

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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

September 16, 1994

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

RE: Naval Industrial Reserve Ordnance Plant Site

Dear Mr. Cabiness:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the RMT, Inc. (RMT) letter dated August 23, 1994, responding to the MPCA staff comments on the Alternatives Array Document submitted on behalf of the U.S. Navy (Navy) for the Naval Industrial Reserve Ordnance Plant (NIROP) Site. RMT's letter 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.

Despite RMT's Response 15 on page 6 of the letter and despite interim discussions between RMT staff and John Betcher and David Douglas of my staff, the MPCA staff stands by its position as stated in Item 15 of the MPCA staff letter dated July 29, 1993, (copy attached) that investigation of Conductivity Anomalies 2, 4, 9, 11, 12, 14, and possibly 15 for buried barrels of hazardous waste as found at Anomaly 13 shall be conducted by visual verification trenches prior to completion of the Feasibility Study (FS) for Operable Unit 2 (OU2). The MPCA staff believes that this approach is reasonable and necessary for the investigation and cleanup of OU2. Any overlooked buried barrels will eventually lead to additional soil and ground water contamination if the barrels leak. Overlooked leaking barrels not only lengthen the cleanup but add to the cost of cleanup. The MPCA staff approach is also consistent with recent MPCA staff responses to RMT's concerns about proceeding with the presumptive remedy concept for soil clean-up remedies for OU2 especially with regard to the distribution of soil contamination in the OU2 soil. The MPCA staff believes that field activities related to this investigation could be completed in a relatively short period, possibly in a week or less.

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Mr. David Cabiness

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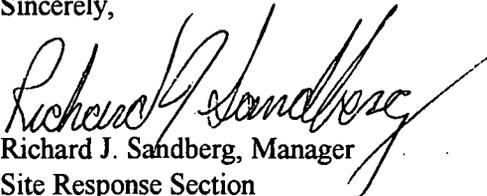
The investigation of these anomalies is clearly a Remedial Investigation activity that needs to be completed in order to select a remedial cleanup for OU2. Any selected soil remedy should also remedy any soil contamination remaining from any needed barrel removal resulting from this investigation. Incidentally, the MPCA staff has never agreed to make this investigation optional as implied in RMT Response 15.

Based on past barrel clean-up actions of the Navy, the MPCA staff believes that the Navy would remove any barrels found by this investigation by conducting a Superfund Removal Action; however, if releases to the soil have occurred in these anomalies as it occurred at Anomaly 13, it is doubtful that the Removal Action would address all soil contamination remaining from these releases.

Remedial technologies being evaluated in the FS need to address any remaining soil contamination from releases from barrels and other disposal activities at Anomaly 13 and any other releases found by further anomaly investigation. Conducting cleanup of soil contamination during the Remedial Design phase for OU2 as suggested by RMT will likely result in additional unnecessary costs to the Navy and in unnecessary delays in the cleanup of OU2.

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

RS:ch

Enclosure

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