



MAR 15 1995

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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CHICAGO, IL 60604-3590

Commanding Officer
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REPLY TO THE ATTENTION OF:

HSRM-6J

RE: Review of the Work Plan for East Plating Shop Soil and Groundwater Investigation
Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, February 1995

The U.S. Environmental Protection Agency has completed the review of the Work Plan for East Plating Shop Soil and Groundwater Investigation Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota (East Plating Shop Workplan). U.S. EPA understands that investigation efforts presented in the East Plating Shop Workplan are precursor to investigations to be conducted as part of Operable Unit #3 Remedial Investigation (OU#3,RI). OU#3, RI will address soils under the Ordnance Manufacturing Building.

U.S. EPA has attempted to expedite review of the East Plating Shop Workplan between Waste Management Division (WMD) and Quality Assurance Branch (QAS). Following incorporation and approval of the East Plating Shop Workplan, data generated from investigations will be considered as an addendum to the OU #3 RI. Please incorporate the following review comments and re-submit a final East Plating Shop Workplan.

1. Executive Summary: The ES needs a paragraph similar to the last paragraph on page 1-1, explaining why the Navy is doing the investigation at this time.
2. ES-1, 2nd paragraph: The last two sentences need to be more clearly worded. Are groundwater samples being analyzed for VOCs, semi-VOCs, metals, PCBs, pH and cyanide or total and dissolved metals, or all of these parameters?
3. Plant History: Description of plant history needs to be more complete. Previous Navy reports could be used to add information to plant history section.
4. Plant History, 2nd paragraph, last sentence: A statement should be added that explains that the Navy plans to research information as part of OU#3, RI, and gain knowledge of plating operations prior to 1973.
5. Plant History, 3rd paragraph, last two sentences: In the Past Investigations section it states that sample results from two soil borings indicate that TCE, chromium, copper, nickel and cyanide are present. There are several sentences in this report that contradict that statement.

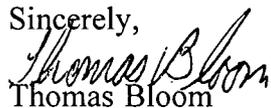


6. Plant History, last paragraph, last sentence: Change "During" to "Between" renovation activities. The reader may interpret "during" to mean that the Navy will be conducting soil and groundwater sampling at the same time as renovation activities.
7. Past Investigations, 1st paragraph, 5th sentence: Investigation of OU #3 is not required by U.S. EPA. It is necessary as part of conducting a thorough site investigation under the U.S. Navy's Installation Restoration Program. MPCA, U.S. EPA and U.S. Navy have all decided that investigation of source areas under the Ordnance Manufacturing Building is necessary.
8. Past Investigations, 1st paragraph, 6th sentence: The proposed field work is not just being performed to accommodate remodeling of the plant. See review comment #1.
9. Past Investigations, 1st paragraph, last two sentences: Add (OU#2) to the Soil Investigations sentence and (OU#1) to sentence relating to Groundwater investigation described.
10. Project Organization: The Navy is responsible for overall management of all remedial activities at NIROP, Fridley, including this project. Please re-word.
11. Field Organization, 1st paragraph, last sentence: Will the FOL sign all chain-of-custody forms? If not, the FOL can not properly assume custody of all samples.
12. Field Organization, 4th paragraph: A statement should be added to indicate that a written site-specific Health & Safety Plan will be used for assuring that all site personnel adhere to health and safety requirements.
13. Field Operations Summary, 1st paragraph, 6th sentence: See review comment #5.
14. Field Operations Summary, 2nd bullet: Please state the exact name for this document. I am not familiar with "The Remedial Action Monitoring Plan for Groundwater Remediation Work Plan".
15. Field Operations Summary, Table 2-1: What is the purpose for analyzing one soil sample for TCLP?
16. Temporary Monitoring Wells, last paragraph: One round of groundwater samples will be collected.
17. Well Development, last two sentences: Turbidity criteria from the QAPP should be referenced here.
18. Surveying: Reference points used in this survey should be tied to benchmarks established for OU#1.

19. Decontamination, Sampling Equipment, last sentence: reference to Section 2.10 should be added to further explain exactly what "proper disposal" is. Decontamination steps used to decontaminate field instruments between sampling points, should be mentioned.
20. Waste Handling, 2nd paragraph, last sentence: Stating that Fridley will take possession of waste drums is not acceptable. A more thorough explanation of possible methods of disposal and which analytical criteria will be used to determine disposal methods, should be added.
21. Environmental Sampling, Groundwater Sampling, last paragraph, 1st sentence: A reference to Section 2.10 should be added to further explain purge water disposal.
22. Quality Control Samples, 4th paragraph, 4th sentence: Analyses of equipment blank every other day is not acceptable.
23. Appendix C: Standard Operating Procedures (SOPs) for analyzing pH in soil should be provided. The SOPs provided as part of the 1992 QAPP does not include the pH SOP.
24. Appendix C: A Project Organization Chart documenting organization of the new contractors should be provided.
25. Appendix C: A signature page is missing.
26. Appendix C: A project schedule is missing.
27. Appendix C, Table 2-1: See review comment #15. The SOP for TCLP analysis should be provided.
28. Appendix C, Table 2-2: For VOC analysis two (2), 40 ml containers should be submitted.
29. Appendix C, Section 10: Replace Central Regional Laboratory with Monitoring Quality Assurance Branch (MQAB).

If you have any questions regarding U.S. EPA's review of the East Plating Shop Workplan, please contact me at (312) 886-1967.

Sincerely,



Thomas Bloom
Remedial Project Manager

cc: Dave Douglas, MPCA