

Minnesota Pollution Control Agency

April 6, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Cabiness, Code 1862
Commanding Officer
Southern Division
Naval Facilities Engineering Command
PO 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 March 27, 1995, letter to you from Mr. Michael Flaherty of Metropolitan Council Wastewater Services regarding Metropolitan Council Permit 2154 for the Naval Industrial Reserve Ordnance Plant (NIROP) Site.

The MPCA staff agrees with the scope of this letter; however, the MPCA staff reminds the U.S. Navy (Navy) that the Federal Facility Agreement (FFA), dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the Navy still governs the cleanup of the NIROP Site.

With this in mind, the MPCA staff disapproves Option I in Item 6 of this letter. This is not a viable option under the FFA since under this option cleanup of the contaminated aquifer would cease. Also the MPCA staff reminds the Navy that the Navy shall determine the quality of the ground water again when contaminated ground water from any new pump out well (or wells) is discharged at this or any other discharge point. As you are aware new pump out wells are soon to be installed at the NIROP Site. The addition of contaminated ground water from these wells could result in exceedances of contaminant levels in the above-cited permit.

520 Lafayette Rd. N.; St. Paul, MN 55155-4194; (612) 296-6300 (voice); (612) 282-5332 (TTY)

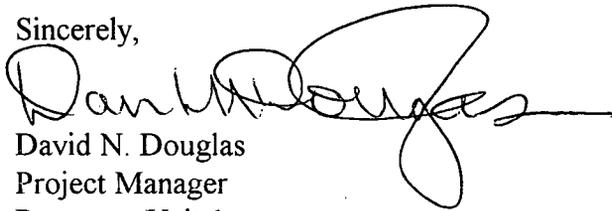
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If you have any questions regarding this letter, please contact me at (612) 296-7818.

Sincerely,



David N. Douglas
Project Manager
Response Unit 1
Ground Water and Solid Waste Division

DD:ch

cc: Sidney Allison, Navy, Southern Division
Michael Flaherty, Metropolitan Council Wastewater Services
Thomas Bloom, U.S. Environmental Protection Agency