



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 1 1995

Commanding Officer
Dave Cabiness/Code 1862
SOUTHNAVFACENGCOM
2155 Eagle Drive, P.O. Box 190010
North Charleston, S.C. 29419-9010

SR-6J

RE: Feasibility Study for the Soils Operable Unit, Naval
Industrial Reserve Ordnance Plant, Fridley, Minnesota,
April 1995

Dear Dave:

The United States Environmental Protection Agency (U.S. EPA) has consulted with the Minnesota Pollution Control Agency (MPCA) regarding a potential change in the site strategy at the Naval Industrial Reserve Ordnance Plant (NIROP), Fridley, MN. The U.S. EPA concurs with MPCA's memo (8/30/95) which explains rationale for the change in site strategy. U.S. EPA understands that the reasons for the change in site strategy stem from preliminary investigation results of source and groundwater contamination under the East Plating Line beneath the NIROP manufacturing building. U.S. EPA agrees with the rationale that if contamination under the NIROP manufacturing building is extensive, it may be advantageous at this point, to complete work relating to the Feasibility Study for OU2 (FS OU2), but not continue with remedy selection, until the Remedial Investigation for OU3 (RI OU3) is complete.

At completion of RI OU3, U.S. EPA understands that the U.S. Navy may then combine the remedy selection for OU2 (source areas outside of the NIROP manufacturing building, and OU3 (source areas beneath the NIROP manufacturing building) into one comprehensive remedial action. U.S. EPA also understands that the U.S. Navy may choose to select separate remedies for OU2 and OU3.

Therefore, U.S. EPA would like the U.S. Navy to complete the FS OU2, by incorporating all U.S. EPA's review comments except review comments 27, 30, 32, 36, 37, 38, 39, 40, 44, 45, 47-paragraphs 1 & 2, 48, 51, 55, 60, 61, 62, and 65.



U.S. EPA does not agree with the U.S. Navy's discussions in the FS OU2 regarding additivity of risk, SVE as an effective remedy for cPAHs, institutional controls as a sole remedy, TCE contamination of the entire vadose zone from underlying groundwater, and liner use for replacement of thermally treated soils. U.S. EPA believes that concerns regarding these specific review comments can be addressed in the FS OU3, or by a separate memorandum from the U.S. Navy to U.S. EPA.

If you have any questions regarding this letter, please contact me at (312) 886-1967.

Sincerely,

Thomas Bloom

Remedial Project Manager

cc: Dave Douglas