



Brown & Root Environmental

A Division of Halliburton NUS Corporation

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SD-12-95-002

December 13, 1995.

Commanding Officer
SOUTHDIV NAVAFACENGCOM
Mr. Scott Glass/Code 18610
P.O. Box 190010
North Charleston, SC 29419-9010

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0003

SUBJECT: Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota
OU3 Remedial Investigation, Feasibility Study, Proposed Plan and Record of Decision
Revised 10/11/95 Meeting Minutes

Dear Mr. Glass:

Please find revised minutes from the October 11, 1995 meeting to discuss the site evaluation report and remedial investigation work plan attached. Your comments on the minutes dated November 21, 1995 were incorporated.

Please contact me at (412) 921-8195 or Mark Perry at (412) 921-7217, if you have any questions or comments.

Very truly yours,

Kevin F. Donnelly, P.E.
Task Order Manager

KFD/dt

cc: Mr. Mark Perry, B&R Environmental
Project File 6966

MEETING MINUTES

Meeting Topics

Naval Industrial Reserve Ordnance Plant (NIROP) Fridley Operable Unit (OU) 3 Site Evaluation Report.

NIROP Fridley OU 3 Remedial Investigation (RI) Work Plan "Kick-off" Meeting.

NIROP Fridley East and West Plating Shops Soil and Goundwater Investigation Work Plan "Kick-off" Meeting.

Meeting Date and Time

October 11, 1995 from 1:30 to 5:30.

Meeting Location

NIROP Fridley, MN.

Meeting Attendees

Scott Glass	Southern Division Naval Facilities Engineering Command (SOUTHNAVFACENGCOM)
David Cabiness	SOUTHNAVFACENGCOM
Peter Hess	SOUTHNAVFACENGCOM
Pat Mosites	Naval Facilities Engineering Command (NAVFAC)
Kerry Morrow	Naval Sea Systems Command (NAVSEA)
Kevin Donnelly	Brown & Root Environmental (B&R Environmental)
Andy Kendrick	B&R Environmental
Mark Perry	B&R Environmental
Tom Bloom	United States Environmental Protection Agency (USEPA)
Dave Douglas	Minnesota Pollution Control Agency (MPCA)
John Betcher	MPCA
Mark Ferrey	MPCA
Paul Estuesta	MPCA
R.W. John Aubert	Teague

Discussion Summary

1. B&R Environmental presented the Site Evaluation Report as the basis for the Work Plans. The Site Evaluation Report identifies 59 specific sites, the sanitary sewer system and the storm sewer system as areas to be evaluated during the RI. The USEPA and MPCA stated that the Site Evaluation Report was good but there were certain items they would like addressed. Those items followed by any Navy/B&R Environmental response are listed below:
 - Comment: Consider contaminants other than trichloroethene (TCE). Response: Contaminants other than TCE were considered, however TCE was the focus of the report because TCE was identified as the principal contaminant of concern at NIROP Fridley. It was agreed that contaminants other than TCE would be addressed during the RI based on historical chemical use at each area.

- Comment: Consider the United Defense LP portion of the main industrial plant building. Response: The United Defense property is not within the scope of the OU3 per the Federal Facilities Agreement (FFA). The Navy will expand the scope of the investigation only if it is determined that contaminants from the Navy property have migrated to the United Defense property.
 - Comment: Issue the report to the public for comment. Response: The report was made available to the community members of the Restoration Advisory Board (RAB).
 - Comment: Document why research was stopped at certain points (e.g., were there no additional records?, did additional records exist but could not be obtained?, or was there no need for additional research because the existing information was adequate?). Response: The purpose of the site evaluation was to determine points of contaminant entry to the vados zone in order to focus the RI. Once it was determined that the points of potential contaminant entry were numerous and essentially covered the entire area there was no need to continue the data search. It was also felt that the data search had reached the point of diminishing returns and regardless of how much effort was made to determine contaminant useage and disposal it could never be assumed that the data search was complete.
 - Comment: The USEPA and MPCA will issue a comment letter after completing their review of the Site Evaluation Report. Response: After receiving the USEPA/MPCA comments, the Navy will issue a comment response letter or revised report which addresses the regulatory comments.
2. B&R Environmental presented the proposed technical approach for the RI and East/West Plating Shops investigation. A phased approach is proposed. Phase I includes the collection of shallow and deep soil gas samples and a shallow groundwater sample at each area being investigated followed by field screening for chlorinated organics. Phase II includes the collection of additional soil gas and groundwater samples combined with field screening for chlorinated organics to define the extent of contamination at the contaminated areas identified in Phase I. Phase III includes deep soil borings/monitoring wells, located based on the results of Phase II, to characterize the geological and hydrogeological conditions beneath the contaminated areas and to determine if dense nonaqueous phase liquid (DNAPL) is present in the groundwater. USEPA/MPCA comments on the proposed technical approach are listed below:
- Comment: Consider contaminants other than TCE. Response: It was agreed that contaminants other than TCE would be considered based on historical chemical uses at each area.
 - Comment: Field screening results should be confirmed via the use of fixed base laboratory analyses. Response: Soil gas and groundwater will be analyzed for volatile organics using an on-site gas chromatograph. Sufficient QA/QC procedures will be incorporated to provide level C (EPA Level III) data quality. Therefore, no fixed base laboratory TCL volatile analysis is proposed for the phase I investigation. As agreed during the meeting, other contaminants could be present at some areas. Additional samples and analysis will be proposed in areas where records of previous activities suggest the potential for other types of chemicals. All other analyses will be sent to a fixed-base laboratory.
 - Comment: Consider seismic imaging results prior to selecting deep soil boring/monitoring well locations. Response: The Navy is proceeding with plans to conduct a seismic imaging study of the site. The seismic imaging results will be considered if available when the deep soil boring/monitoring well locations are selected. The seismic imaging results will be incorporated into the RI Report regardless of whether they are available for consideration during the selection of soil boring/monitoring well locations.

- Comment: USEPA has some unique Quality Assurance Project Plan (QAPP) requirements. Therefore, RMT Inc.'s previously approved OU2 QAPP should be used noting any exceptions taken to it. Response: At the time of the meeting, the Navy planned to incorporate by reference the existing QAPPs, as appropriate, into the Master Project Plan and highlight any changes to the existing OU1 and OU2 QAPPs (since that time, the Navy has decided to prepare a new comprehensive QAPP for OU3 because the amount/nature of cross referencing existing QAPPs would yield a product that is confusing and vulnerable to misinterpretation in the field and because the MPCA has stated that the existing QAPPs do not meet the requirements of the FFA).