



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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NIROP FRIDLEY
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REPLY TO THE ATTENTION OF:

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

SR-6J

RE: Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota,
Draft Site Management Plan, October 1995

Dear Dave:

The United States Environmental Protection Agency (EPA) has completed the review of the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, Draft Site Management Plan (SMP), dated October, 1995. EPA understands that the U.S. Navy (Navy) will incorporate EPA comments and issue a final draft SMP for review. After approval of the SMP, the Federal Facility Agreement (FFA) will be modified to incorporate the SMP as an enforceable document.

General Comments:

The SMP was proposed by the U.S. Navy (Navy) as part of the settlement offer made during enforcement negotiations. Navy offered a \$130,000 cash component, another Project Manager to assist at NIROP, a Supplemental Environmental Project (SEP) equal to \$325,000, and a Site Management Plan (SMP). Navy explained that the SMP would be a technical document which would assist Navy with management deficiencies discussed during negotiations, address enforcement concerns uncovered during negotiations e.g. interpretation of which deliverable documents are enforceable (primary, secondary, or other), and specific stipulated penalties for noncompliance with Federal Facility Agreement (FFA).

Therefore, the goals of the SMP at NIROP are to: 1) assist Navy with management of remedial activities, 2) define primary, secondary, and other deliverable documents due during the current Fiscal Year (FY), and planned for the following FY, and 3) present specific penalties for noncompliance with the FFA. Incorporation of specific penalties will be accomplished via modification to the FFA.

Specific Comments:

1. Page 1, Introduction, 1st sentence: Please reword with language "...is prepared in accordance with the requirements of the Federal Facility Agreement between the U.S. EPA, MPCA, and Navy).

2. Page 1, Introduction, #3: Please add "primary, secondary, and other", to specifically describe which type of deliverables are being prepared.

3. Page 1, Introduction, #4: Please add specific type of deliverable (primary, secondary, other).

4. Page 1, Site Management Strategy, 4th sentence: Please reword sentence to explain goals as stated in the General Comments section of this letter.

5. Page 1, Site Management Strategy, 5th sentence: Please reword or delete.

6. Page 1, Site Management Strategy, last sentence: Please reword as follows, "This goal shall be accomplished by developing an overall strategy to locate and remediate source areas and groundwater on site".

Please add this paragraph in this section to specifically describe the current site management strategy.

The site management strategy at NIROP has recently been modified. Site management strategy involves hydraulic containment of contaminated groundwater, on-site treatment, and discharge via existing NPDES outfall. Investigation and remediation of subsurface source areas outside of the NIROP manufacturing building (OU2) was to be conducted separately from investigation and remediation of subsurface areas beneath the NIROP manufacturing building (OU3). The combination of subsurface source remediation and groundwater containment and treatment is the over all strategy to remediate the site.

Recent modification of site strategy was made because preliminary results of subsurface sources areas beneath the NIROP manufacturing building indicate that soils are visually contaminated and groundwater is highly (1700 ppm) contaminated. If a large subsurface area beneath the NIROP (OU3) is highly contaminated when compared to subsurface source areas outside of the NIROP manufacturing building (OU2), it may be advantageous for the Navy to address remedy selection of both OU2 and OU3 concurrently. Therefore, modification to the site management strategy involves combination of remedy selection for OU2 and OU3.

7. Page 2, Operable Units, 2nd sentence: Please reword as follows, "OU1 encompasses contaminated groundwater on site".

8. Page 2, Operable Units, 3rd sentence: Please reword as follows, "OU2 encompasses subsurface source areas outside of the Main Industrial Building as identified in the RI for OU2.

9. Page 2, Operable Units, 4th sentence: Please reword as follows, "OU3 encompasses potential subsurface source areas beneath the Main Industrial Building.

10. Page 2, Operable Units, 5th sentence: Please replace the word "facility" with "site". Please remove the word "likely" and add the word "groundwater " before contamination.

11. Page 2, Table 1, OU2: Please replace the word "Soils" with "subsurface source areas". Also correct Status of Investigative/ Remedial Activities description. An interim drum removal action is not in progress.

12. Page 2, Table 1, OU3: Please replace the word "Soils" with "subsurface source areas". Also add the word "unknown" to Waste type column.

13. Page 3, Installation Restoration Program Goals and FY 1996 Deliverables, 1st sentence: Please remove "pursuant to this SMP". Please replace the word "soil" with "subsurface source areas". Please remove "in a timely and cost-effective manner".

14. Page 3, Installation Restoration Program Goals and FY 1996 Deliverables, 2nd sentence: Please replace the words "intends on " with "will continue". Please omit the phrase "previously agreed to by the Parties". Please remove the word "follow-on".

15. Page 3, CY 1996 IR Program goals for the NIROP, 3rd bullet: Please add the words "if necessary".

16. Page 3, CY 1996 IR Program goals for the NIROP, 4th and 5th bullet: Please delete. The recent modification to site management strategy allows the Navy to postpone completion of the Proposed Plan and ROD for OU2 and address remedy selection of OU2 in combination with remedy selection of OU3.

Please change Primary Documents to reflect the abovementioned review comment. Please list Secondary Documents.

17. Page 3, Primary Documents: Please add the SMP as a primary document.

18. Page 3, Installation Restoration Program Goals and FY 1996 Deliverables, Other Deliverables: Please remove Responsiveness Summary to PP for OU2.

19. Page 4, Schedule, 2nd line, indentation: Please reword as follows: "Navy incorporation of review comments and delivery of draft final". In some cases a Response to Comments memorandum will not be necessary.

20. Page 4, Schedule, Please add language stating that the U.S. Navy shall submit and implement (when approved) an updated schedule to the SMP by October 1, each year, (or when the Navy knows the upcoming Fiscal Year funding has been approved).

Please contact me at (312) 886-1967 if you have any questions regarding this letter .

Sincerely,



Remedial Project Manager

cc:

Jim Morris, EPA ORC
Dave Douglas, MPCA