



Minnesota Pollution Control Agency

July 29, 1997

HAND DELIVERY

Mr. Scott A. Glass, Code 18610
Commanding Officer
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Glass:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the following documents, all dated June 30, 1997:

1. "Final Work Plan for Operable Unit 3 Remedial Investigation/Feasibility Study," Volume I of IV;
2. "Final Field Sampling Plan for Operable Unit 3 Remedial Investigation/Feasibility Study," Volume II of IV; and
3. "Final Quality Assurance Project Plan for Operable Unit 3 Remedial Investigation/Feasibility Study," Volume IV of IV.

These documents are for Operable Unit 3 of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund site and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (EPA), and the U.S. Navy (Navy).

Final Work Plan for Operable Unit 3 Remedial Investigation/Feasibility Study:

The MPCA staff hereby approves this report.

Mr. Scott A. Glass
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Final Field Sampling Plan for Operable Unit 3 Remedial Investigation/Feasibility Study:

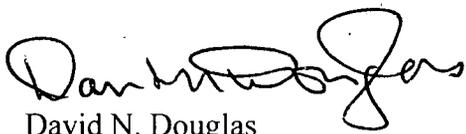
The MPCA staff hereby approves this report.

Final Quality Assurance Project Plan for Operable Unit 3 Remedial Investigation/Feasibility Study:

The MPCA staff hereby modifies this report pursuant to Attachment I of this letter.

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

Sincerely,



David N. Douglas
Project Manager
Response Unit I
Site Response Section
Ground Water and Solid Waste Division

DND:lk

Enclosure

cc: Thomas Bloom, EPA

Attachment I
Modifications to the report entitled, "Final Quality Assurance Project Plan for
Operable Unit 3 Remedial Investigation/Feasibility Study,"
dated June 30, 1997

General Modification:

One item discussed and agreed to by the Minnesota Pollution Control Agency (MPCA) staff and the U.S. Navy (Navy) that does not appear in the text is that standard methodologies would be used for the water analyses on site as long as no compounds of concern (COCs) were found in the soils analyses. If COCs are found in the soil, low level methods shall be required to meet health risk limits (HRL) levels for the water analyses. The report shall be changed accordingly.

Lauck Laboratory Volatiles Standard Operating Procedures:

1. The actual data packet being reported out by Lauck shall include all information needed for a full audit by Brown & Root Environmental. This includes raw data, Quality Assurance/Quality Control (QA/QC) data, blanks, etc.
2. Section 1.2 (page 27 of 44) shall include information that states if the continuing calibration verification standard (CCVS) should fail criteria, it may be rerun once. If the CCVS fails again, a recalibration shall be done.
3. If the blank spike fails required recoveries, the data shall be flagged.
4. All narratives from the laboratory dealing with QA/QC issues shall be forwarded to the MPCA and U.S. Environmental Protection Agency with the reports.
5. In section 8.3, if a surrogate fails, the effected data shall be flagged.

Brown and Root Mobile Laboratory Standard Operating Procedures:

1. The calibration mixture shown in the standard operating procedure is missing bromodichloromethane, dibromochloromethane, 1,2-dichloropropene, cis-1,3-dichloropropene, and trans-1,3-dichloropropene. The mixture shall include these chemicals.
2. Table 4 displays COCs with low level standards that do not meet required reporting limits and not all COCs appear to have a five point calibration curve. This shall be corrected.

3. In section 5.8.2.3, the %D (percent difference) shall be less than 25 percent for all compounds.
4. The limits for the QC check standard shall be 70 to 130 percent. (Reference section 5.9.1)
5. Any COCs in the blanks shall be less than the reporting limits or flagged accordingly.
6. Analysis shall not commence with contamination being present in the initial calibration blank.
7. The municipal section/material safety datasheet shall have recovery limits of 70 to 130 percent.
8. All soil samples shall be preserved with methanol or be taken in a zero headspace vessel. There shall be no scooping of soil into a bottle.