

Minnesota Pollution Control Agency

HAND DELIVERED

September 9, 1997

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 your e-mail message of September 2, 1997, to the Naval Industrial Reserve Ordnance Plant partnering team outlining details about the investigation in Anoka County Park. The investigation is being proposed pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency, and the U.S. Navy (Navy).

As you indicated to John Betcher and me in our telephone conversation of September 4, 1997, the Navy intends to send us a written letter work plan for our review and response before the field work for this investigation begins. The work plan will also include a map which shows where monitoring is proposed to occur. We are committed to meeting the goal of conducting this field work this construction season and commend the Navy for the timely response to the Anoka County Park issues.

In Attachment I please find some preliminary comments about the draft work plan. Many of these items were discussed over the telephone, but if there are questions please give us a call if you would like to discuss any of the items.

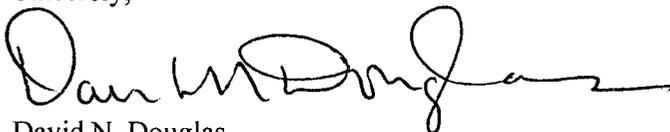
The MPCA staff has no opposition to the Navy's proposal to using the field laboratory now being used for the Operable Unit 3 (OU3) field work as long as all MPCA staff audit issues have been satisfied before any Anoka County Park samples are analyzed.

Mr. Scott Glass
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As a result of team discussions here after our telephone conference, the MPCA staff would like the Navy to collect and analyze representative samples of the pond sediments (soil samples). The samples would be used to determine if the pond sediments may be a "source area" for ground water contamination and to establish any necessary deed restrictions if contaminated sediments exist in the former pond. Please include collection of soil samples from within the pond sediment in the work plan for the same parameters identified for OU3.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David N. Douglas". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

DND:ch

Enclosure

cc: Thomas Bloom, U.S. Environmental Protection Agency

Attachment I

**Modifications to the E-mail Message,
dated September 2, 1997,
from Scott Glass**

The Minnesota Pollution Control Agency (MPCA) staff requests the following:

1. That the work plan include a scale map which shows the features that we are concerned with including the existing monitoring wells, the plume isoconcentrations, the outfalls, the pond, the location of the cone penetration technology (CPT) lines (and sample points) and any other additional points needed off of these lines to meet the work objectives (e.g., extra sampling points around outfalls and sampling points in the pond);
2. That pond sample locations dedicated to this area be located on the scale map and that a pond elevation be determined from old drawings to determine the vertical interval that should be sampled to properly evaluate pond sediments;

(This will probably mean deviating from the sampling depth for the other sampling lines.)

3. That the elevation of the former outlets be determined from old drawings so that the sampling depths for the outlets can be determined;

(The density of sampling should be increased around these outlets and it is recommended that some pushes downgradient of the outfalls be done to evaluate potential downgradient impacts.)

4. That the first phase of push work include the 60 pushes planned for the two 1500 foot lines and that the work begin in the center of the plume and proceed outward to the north and to the south until the edge of the plume is reached;

(Any additional push locations that remain after the edge of the plume is reached could be used for a second phase to refine the existing lines or in doing other areas of interest.)

5. That if there are sufficient sampling points and time remaining, that the "triangle" north of the pumpout wells and south of the main NIROP building in the United Defense L.P. parking lot be investigated to identify the plume upgradient of the pumpout system and to determine whether or not there is a "bowl" in the confining unit exists there as the Brown & Root Environmental modelers have speculated; and

(This information may help to evaluate the efficiency of the ground water pump and treat system in removing contaminants. If the Navy has additional areas to be investigated, the MPCA staff encourages the Navy to use this investigation as an opportunity to do so.)

6. That the Navy contact Anoka County officials as soon as possible to obtain access and permission to conduct this work.