



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

N91192.AR.000370
NIROP FRIDLEY
5090.3a

OCT 20 1997

REPLY TO THE ATTENTION OF:

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

SR-6J

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

Dear Scott:

The United States Environmental Protection Agency (U.S. EPA) submitted comments to the Feasibility Study for Soils Operable Unit, Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, April 1995, (FS OU2), in July 1995. Following submittal of U.S. EPA's review comments a change in site strategy occurred which did not require subsequent approval of the FS OU2. As documented in U.S. EPA's letter dated December 1, 1995, U.S. EPA requested that revisions be incorporated and that the FS OU2 be completed. After discussions about incorporation of U.S. EPA's comments were completed, U.S. Navy submitted the Feasibility Study Soils Operable Unit (OU2) in April 1997. U.S. EPA has completed review of the Feasibility Study Soils Operable Unit (OU2) and considers the document complete. U.S. EPA understands that at completion of the Remedial Investigation for Operable Unit 3, the U.S. Navy plans to use the FS OU2 in combination with a Feasibility Study for Operable Unit 3, to continue with the remedy selection process at the Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota.

Sincerely,

A handwritten signature in cursive script that reads "Thomas R. Bloom".

Remedial Project Manager

cc: Dave Douglas, MPCA

Enclosure: Letter regarding Feasibility Study for the Soils Operable Unit, Naval Industrial Reserve Ordnance Plant, Fridley, Minnesota, April 1995, dated December 1, 1995.



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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.

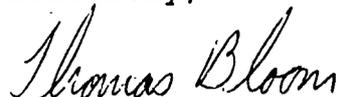
At completion of RI OU3, U.S. EPA understands that the U.S. Navy may then combine the remedy selection for OU2 (source areas outside of the NIROP manufacturing building, and OU3 (source areas beneath the NIROP manufacturing building) into one comprehensive remedial action. U.S. EPA also understands that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



Remedial Project Manager

cc: Dave Douglas