



Minnesota Pollution Control Agency

October 24, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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 August 19, 1997, letter from Mr. Mark Sladic, Brown and Root Environmental, to me responding to the MPCA staff letter of July 29, 1997, that modified the "Final Quality Assurance Project Plan for Operable Unit 3 Remedial Investigation/Feasibility Study," (QAPP) dated June 30, 1997. This letter is for the Naval Industrial Reserve Ordnance Plant Superfund Site and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency, and the U.S. Navy.

The MPCA staff hereby approves the QAPP as previously modified. Comments to the most recent issues concerning the QAPP are contained in Attachment I to this letter.

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".

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

Comments to the Report Entitled, "Final Quality Assurance Project Plan for Operable Unit 3 Remedial Investigation/Feasibility Study," dated June 30, 1997

Lauck Laboratory Volatiles Standard Operating Procedures:

- Item 3: The Minnesota Pollution Control Agency (MPCA) staff agrees with the response if the case narratives are complete with all Quality Assurance/Quality Control issues that could affect the quality of the data discussed.
- Item 4: The MPCA staff agrees with the response if the narrative that accompanies the data validation includes information that would affect the data.
- Item 5: The MPCA staff agrees with the response. The laboratory does not need to flag data. The response should have been directed to the validation of the data.

Brown and Root Mobile Laboratory Standard Operating Procedures:

- Item 4: The MPCA staff requests that data validation include flagging any data associated with a laboratory control standard that exceeds the 70 - 130% recovery window.
- Item 5: Flagging at the "5 x" rule (per the National Functional Guidelines) is agreeable, but the MPCA staff requests that any detects above the reporting limit (CRQL/CRDL) be flagged "J" in data validation and left at the concentration reported. This avoids an errant result causing samples to have "nondetects" when the compound may have well been there.
- Item 6: The MPCA staff requests that the "J" flag be applied in data validation (see MPCA staff response to Item 5).
- Item 7: See MPCA staff response to Item 4 above.
- Item 8: Methanol is currently an option for soil sampling in Method 5035 (of SW-846, Update III). Sampling can also be done into a zero headspace sampling device, but scooping soil into jars or "stuffing" the jars with soil causes volatilization of volatile compounds. The MPCA staff requests that all future volatile compound sampling be done in accordance with Method 5053.