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Code 18610
February 12, 1998

Mr. David Douglas
Minnesota Pollution Control Agency
Site Response Section
Division of Ground Water and Solid Waste
520 Lafayette Road
St. Paul, Minnesota 55155-4194

Subj: NAVAL INDUSTRIAL RESERVE ORDNANCE PLANT, FRIDLEY –
EVALUATION OF GROUNDWATER CONTAINMENT SYSTEM
EFFECTIVENESS

Dear Mr. Douglas:

The Navy is providing this letter as a formal written response to your letter dated February 5, 1997 which provides comments to the "Evaluation of Groundwater Containment System Effectiveness", dated July 31, 1996. As you know, the NIROP Partnering Team has decided that future discussions of containment effectiveness will be included in future Annual Monitoring Reports rather than being provided under separate cover.

Important Open Issues:

The concerns identified as "Important Open Issues" focus primarily on the effectiveness of capture in areas of potential source contamination and the ability to modify the containment system. As you are aware, the Groundwater Numerical Model (GNM) was revised by Tetra Tech NUS (formerly Brown & Root Environmental) using existing data (including the seismic investigation data). Representatives from the Navy, MPCA and Black & Veatch (EPA's contractor) reviewed the revised model in December 1997 and identified several limitations to the existing model. The USGS is scheduled to collect additional data in the spring of 1998 to address some of the model limitations. Tetra Tech NUS is scheduled to upgrade the model by incorporating OU3 data and Anoka County Park data recently collected along with the data USGS will provide. An upgraded model is expected to be delivered by July 1998. Upon evaluation of the revised model, the Project Team will assess the effectiveness of groundwater capture as it relates to known sources and will recommend appropriate modifications to the extraction system as necessary.

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Modifications to the Report:

The concerns identified in the “Modification of the Report” summary primarily focuses on the capacity to expand the current ground water treatment system, the need to upgrade the GNM and the need to modify the containment system. As you are aware, the treatment system design is modular in nature and will accommodate future expansion to handle increased flow if necessary. As stated above, The Project team will evaluate the updated GNM to determine if the containment system requires modification.

Attachment I Modifications:

1. Noted.
2. After the OU3 data and upgraded GNM outputs are evaluated, the Project Team will assess the significance of any OU3 sources and determine if modifications to the containment system are warranted.
3. The Project Team will determine, based on pertinent new information, if modifications to the containment system are warranted to address concerns of significant non-capture.
4. Based on the outputs of the updated GNM, the Project Team will determine if and where additional monitoring wells should be located to adequately assess groundwater contamination from North 40 source areas, and assess the need for modifications to the containment system to address significant non capture of contaminated groundwater from North 40 and other suspected source areas.

Should you have any questions or comments, please contact me at (803) 820-5587.

Sincerely,

“ S I G N E D ”

SCOTT A. GLASS, P.E.
Remedial Project Manager
Installation Restoration II Division

Copy to:

US Environmental Protection Agency, Region V, Thomas Bloom
Tetra Tech NUS, Mark Sladic, P. E.

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