



Minnesota Pollution Control Agency

July 2, 1999

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Joel R. Sanders, Code 1868
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Sanders:

I have reviewed the document entitled "Minutes of Meeting, Technical Assistance Meeting for Remedy Selection" (Minutes), dated June 10, 1999.

My comments to the Minutes can be found in Attachment I of this letter.

In general, while John Betcher and I found Mr. Evan Nyer's observations insightful, we believe that we need further discussion with the Navy to understand the rationale for some of his observations and recommendations. We do not agree with some recommendations. For example, we do not understand the basis for his observation that there are no cost-effective source removal remedies for Operable Unit 3. Also, we are not sure how much he really understands about the Naval Industrial Reserve Ordnance Plant Site. Please tell us if Mr. Nyer reviewed the Minutes. If not, will he be reviewing them? If he will be reviewing the Minutes, does he have changes to them and will we get to see his changes?

If you have any questions regarding this letter, please contact me at (651) 296-7818.

Sincerely,

David N. Douglas

Project Manager

Site Remediation Section

Metro District

DND:csa

cc: Thomas Bloom, U.S. Environmental Protection Agency (w/enclosure)
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosure)

Attachment I
Comments to the
"Minutes of the Meeting,
Technical Assistance Meeting
For Remedy Selection," Dated June 10, 1999

Item 1: Introductions/..., fifth bullet

I believe that Well 27-S has shown higher concentrations of Trichlorethylene (TCE) in the past. Also, I believe that we will get a better understanding of contaminant flux to the river when the ground water compliance well network is installed and sampled. As John has said, the flux calculation based on the flux plane near the river being developed (before the new wells are installed) should be viewed with caution because the compliance well network planned has not yet been installed and sampled.

Item 1: Introductions/..., seventh bullet

Please read the FMC Five-Year Review, dated March 30, 1999, for Minnesota Pollution Control Agency/U.S. Environmental Protection Agency recommendations about what needs to be done to upgrade the Superfund Financial Management Center (FMC) monitoring well network. We have not recommended specific solutions to the problems FMC has at its Site; instead we have recommended that FMC propose solutions.

Item 1: Introductions/..., last bullet

The objectives are not consistent with the Five-Year Review Report (Report). I suggest that the Report be consulted for the objectives, e.g., evaluating remedies for Anoka County Park. This inconsistency is carried throughout the remainder of the document, e.g., first sentence in section entitled "Assessment of Problem."

Item 2: Technical Evaluation and Discussion, Assessment of the Problem, First Paragraph

I do not understand the second sentence. We know we cannot control diffusion. Diffusion is a physical attribute of water. Also I understood Mr. Nyer to say that there is no source remedy that is cost effective for Operable Unit 3 (OU3). John and I did not understand exactly why he believes this. His rationale will need to become part of the public record if the Navy eventually proposes no source removal remedies for OU3. I understood Mr. Nyer to say that we need to construct two flux planes, one at the line of the capture wells and one beyond the ground water hot spot in Anoka County Park.

Item 2: Technical Evaluation and Discussion, Assessment of the Problem, Second Paragraph

The Record of Decision (ROD) does not establish a compliance concentration for protecting the river as a drinking water source. The ROD wrongly omits establishing ARARs and/or TBCs to protect the river as a drinking water source. The Five-Year Review Report for OU1 corrects this omission.

Item 2: Technical Evaluation and Discussion, Assessment of the Problem, Third Paragraph, First Statement

I understood Mr. Nyer to state that he was not being consulted to change the regulatory framework for the Site, be it the 5 microgram per liter (ug/l) TCE requirement to return to ground water to portability or to prevent unacceptable contaminant flux into the river. To protect the Minneapolis Water Works intake, the goal is to reduce TCE flux into the river to below 5 ug/l. I did not hear that Mr. Nyer say that it would not be possible to reach the 5 ug/l TCE requirement in Site ground water. Instead I understood him to say that it may take the Navy 100 to 200 years to do this. Incidentally, Mr. Nyer provided no basis for the latter statement.

Item 2: Technical Evaluation and Discussion, Assessment of the Problem, Fifth Paragraph, Second Statement

As we discussed at the last NIROP partnering meeting on June 30, John and I believe that it is not possible to do a better job of placing the monitoring well network for the line of ground water compliance wells than the effort that resulted from the March 29 technical meeting. As you have stated at the partnering meeting, the Navy intends to proceed to install this line of wells (and the rest of the wells in Anoka County Park) and sample them. The contaminant flux analysis done based on samples from these wells will be far more conclusive about the contaminant flux into the river. We disagree with Mr. Nyer's recommendation to delay the installation of ground water monitoring wells in Anoka County Park. Again the rationale for installing the wells is that the new wells, in part, will give us a basis to conduct better contaminant flux analyses at the two flux planes. We disagree with Mr. Nyer's recommendation that the Prairie du Chien wells not be installed. Minnesota allows these wells to be installed below a contaminant plume, but the wells must be installed in accordance with the Minnesota Department of Health Well Code.

Item 2: Technical Evaluation and Discussion, Assessment of the Problem, Fifth Paragraph, Fourth Statement

I recommend that the Navy talk to Paul Estuesta about a plan to evaluate use of diffusion samplers at the NIROP Site.

Evan Nyer's Conclusions following Item 2: Technical Evaluation and Discussion, Assessment of the Problem, Fifth Paragraph, Fourth Statement

First bullet: I do not understand the statement about the "...90% analysis of the problem." Please explain what this means.

Third bullet: Please explain why source reduction at the East Plating Room is not recommended. Please explain the statements tying source removal to contaminant flux into the river. Remember, the surface water goal for the Site is to reduce the contaminant flux into the river to below 5 ug/l TCE. At this point the solution for this problem is to reduce the TCE mass in Anoka County Park.

Last bullet: The Navy must reduce the contaminant flux into the river to below 5 ug/l TCE. The contaminant flux analysis after the line of compliance ground water wells are installed is the acceptable method to evaluate whether or not any ground water remedy is needed; and if one is needed, is it protecting the river as a drinking water source.

Possible Remedial Technologies at the East Plating Shop

Although politics is often a factor in the Superfund program, I think that we should make our remedial decisions based on the nine criteria in the National Contingency Plan. Only if a remedy is required based on this evaluation, should it be implemented - not for "political" reasons.

With regard to televising the sewer line, before the Navy rejects conducting this work, please explain Mr. Nyer's rationale for not doing this work. Televising sewer lines may not be able to detect small cracks, but televising can document that lines have been grossly damaged where there is exfiltration that could mobilize site contaminants for release into ground water. Also televising the line can document that contaminants in the unsaturated and saturated zone did not come from the sewer line.