



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

September 8, 2000

Mr. Douglas Hildre, P.E.
Environmental Control Manager
United Defense L.P.
Armament Systems Division
4800 East River Road
Minneapolis, MN 55421-1498

RE: FMC Corporation Superfund Site

Dear Mr. Hildre:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled "Annual Groundwater Extraction System Report for 1999," (Report) dated June 2000. The Report was submitted pursuant to the Response Order by Consent between FMC Corporation (FMC) and the MPCA, dated October 28, 1986.

The MPCA staff hereby modifies the Report pursuant to Attachment I of this letter. Please find comments to the Report in Attachment II to this letter. United Defense L.P. does not need to respond to Attachment II.

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

Sincerely,

For:

David N. Douglas, Project Manager
RCRA/Superfund Unit
Site Remediation Section
Metro Division

DND:csa

Enclosure

cc: Thomas Bloom, U.S. Environmental Protection Agency (w/enclosures)
Joel Sanders, U.S. Navy (w/enclosures)

Attachment I
Modification to the Document Entitled,
“Annual Groundwater
Extraction System Report for 1999,”
Dated June, 2000

1. **General Modification** - The MPCA staff requests that United Defense L.P. (UDLP) label figure numbers on the maps in future Annual Groundwater Extraction System Reports so the maps can be more easily referred to in MPCA staff review comments.
2. **Water Level Contours - Confined Aquifer 4/1/9 Map** - Numerous errors exist in the construction of the equipotential map in that the equipotential lines intersect in many places. The MPCA staff requests that this map be redrawn, eliminating intersecting lines, and resubmitted.
3. **Water Level Contours - Confined and Unconfined Aquifer Maps** – The MPCA staff requests that data from the Naval Industrial Reserve Ordnance Plant (NIROP) monitoring wells located on the UDLP property be used to construct equipotential maps of the FMC Site in this and future Annual Groundwater Extraction System Reports. The Navy and UDLP have been coordinating concurrent water level readings at both sites.
4. **General Modification** - As explained in Attachment II to the MPCA staff letter to you dated August 30, 2000, concerning the MPCA staff review of the report entitled, “Work Plan for Site Work to Complete Tasks 1 and 2, dated July 27, 2000, the Navy has stated that UDLP may be responsible for contamination in a number of the NIROP’s southern contaminant plume monitoring wells (see attached copy of MPCA staff letter dated August 30, 2000).

Since this issue is also important to future Annual Groundwater Extraction System Reports as it relates to the location of FMC Site contaminant plumes, the MPCA staff requests that UDLP clarify its position with regard to responsibility for the contamination in these wells. Would UDLP be interested in working with the Navy to come to agreement with the Navy on who is responsible for the contamination in the southern part of Anoka County Park?

5. **General Modification** - The MPCA staff requests that UDLP include new figures in future Annual Groundwater Extraction Reports. The figures include “overlay maps” showing the location of the former dump area, the location and extent of excavated contaminated soil, the containment and treatment vault location, and the relationship (location) of each on isoconcentration and equipotential maps.
6. **General Modification** - The MPCA requests that the cross-sections presented in the “Work Plan for Site Work to Complete Tasks 1 and 2”, dated July 27, 2000, as modified by the MPCA in the work plan approval letter, be included in future Annual Groundwater Extraction System Reports.
7. **General Modification** - It is important to the understanding of both the FMC and NIROP Sites to coordinate water level monitoring efforts so that water levels are collected concurrently for the two sites. The MPCA staff requests that UDLP and the Navy coordinate schedules to obtain water levels during the NIROP October sampling event.

Attachment II
Comments to the Document Entitled,
“Annual Groundwater
Extraction System Report for 1999,”
Dated June, 2000

1. **General Comment** - The Annual Groundwater Extraction System Report provides no analysis of, or comment on, the ground data presented in the report or the effectiveness of the pump-out system in containing the plume. The MPCA staff has requested that UDLP do additional work pursuant to recommendations of the CERCLA Five-Year Review Report dated March 30, 1999, to address the issues of capture of the plume and the adequacy of the monitoring well network. Analysis of the pump-out system effectiveness will rely on the outcome of this additional work. In the MPCA staff response to the report entitled, “Work Plan for Site Work to Complete Tasks 1 and 2,” the staff requests that UDLP make recommendations for which monitoring wells should be sampled for future Annual Groundwater Extraction System Report.

The MPCA staff will review the recommendations and reach agreement with UDLP on wells to be monitored on an annual basis (Attachment, Item 9 of the attached copy of MPCA staff letter dated August 30, 2000).