



Protecting, maintaining and improving the health of all Minnesotans

June 13, 2001

Mark Scadic

Refer to: TN 2408

Mr. Joel R. Sanders, P.E.
Remedial Project Manager
Department of the Navy
Naval Facilities Engineering Command
2155 Eagle Drive
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Dear Mr. Sanders:

Subject: Request for Variance from Minnesota Rules, Chapter 4725, to Inject Vegetable Oil
into Three Wells in the Riverfront Regional Park, Fridley, Anoka County, Minnesota

The Minnesota Pollution Control Agency (MPCA) has requested that the Minnesota Department of Health (MDH) postpone action on your May 11, 2001 request for a variance from MDH rules to conduct a pilot-scale, in-situ bioremediation investigation. The proposed investigation involves injecting food-grade vegetable oil into three wells located in Anoka County's Riverfront Regional Park, immediately west of the Naval Industrial Reserve Ordinance Plant (NIROP) in Fridley, Minnesota. Minnesota Rules, part 4725.2050 prohibits such injection.

On June 5, 2001, Mr. David Douglas, MPCA project manager for the NIROP site, contacted Mr. Michael Convery of the MDH to request the postponement because of questions and unresolved issues regarding the Response Action Work Plan for the NIROP site. Mr. Douglas indicated that a number of problems remained involving groundwater sampling procedures. He forwarded a copy of a letter sent to you, dated June 1, 2001, in which the MPCA rejected the 2000 Annual Monitoring Report because of unresolved issues with groundwater sampling procedures. Mr. Douglas also enclosed a copy of an Order (Number 5360.1 A2, dated May 5, 2000) of the U.S. Environmental Protection Agency (U.S. EPA) that addressed many of the same issues.

Until these issues are resolved, the results of groundwater sampling done during the course of the proposed pilot-scale investigation would be in question. Therefore, the MDH is postponing further action on your variance request until all parties reach agreement on the procedures for groundwater sampling.

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The MDH will resume processing of your variance request once we are notified by the MPCA and the U.S. EPA that the issues regarding the groundwater sampling procedures are resolved, and that they have approved the work plan for the pilot-scale investigation of injection of vegetable oil to enhance bioremediation of chlorinated solvents at Anoka County's Riverfront Regional Park immediately west of NIROP in Fridley, Minnesota.

If you have any questions or wish to discuss this matter further, please contact me at 651/215-0827.

Sincerely,



Edward C. Schneider, Hydrologist
Well Management Section
Environmental Health Division
P.O. Box 64975
St. Paul, Minnesota 55164-0975

ECS:MPC:dg

cc: David Douglas, Minnesota Pollution Control Agency
Thomas Bloom, U.S. Environmental Protection Agency
Jeff Perry, Anoka County Parks
Laura Schmidt, Anoka County Environmental Services
Venky Venkatesh, CH2M Hill Constructors, Inc.
Daniel Griffiths, Parsons Engineering Science, Inc.

bc: Ed Schneider, MDH
Michael Convery, MDH
Ronald Thompson, MDH