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PITT-11-1-062

November 20, 2001

Project Number 7842

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

Reference: CLEAN CONTRACT No. N62467-94-D-0888
Contract Task Order No. 0057

Subject: 2001 Annual Monitoring Report Work Plan
Response to MPCA Comments
NIROP Fridley, Fridley, Minnesota

Dear Dave:

On behalf of the US Navy Southern Division NAVFACENGCOM, we provide the following responses to the MPCA's recent November 21, 2001 letter providing comments on the 2001 Annual Monitoring Report (AMR) Work Plan dated October 2001.

2001 Annual Monitoring (Report) Work Plan

MPCA's letter states that the MPCA staff hereby modifies the 2001 Annual Monitoring (Report) Work Plan pursuant to Attachment I of this letter. The Navy had been seeking 'concise, unambiguous approval' for the Work Plan. The MPCA's letter does not say whether approval is implicit in acceptance of the MPCA's comments, and the letter does not indicate that overtly, either. The Navy had sought approval because confusion resulting from MPCA's prior inconsistent comments, regarding approval of earlier Remedial Action Work Plan (RAWP) submittals, is viewed as a primary factor in rejection of last year's AMR. The MPCA's contradictory statements creating this confusion are detailed in our June 19, 2001 letter to MPCA.

The Navy had initially provided (on August 9 via email) very specific analysis of the effort required to prepare an Addendum to the Veg Oil Work Plan, and suggested initiating this process immediately. Note: the Veg Oil Work Plan is properly titled Approved Work Plan for Field Application to Enhance in-Situ Bioremediation of Chlorinated Solvents via Vegetable Oil Injection at the Naval Industrial Reserve Ordnance Plant (NIROP) Fridley, Minnesota. For various reasons, the MPCA did not agree to this approach until October 1.

By October 11, the Navy had distributed the draft AMR Work Plan. MPCA did not contact the Navy with any issues until October 31. At that time, we reiterated the request that MPCA provide an approval letter for the AMR Work Plan in the same format as previously provided on September 28 for the Veg Oil Work Plan. MPCA did not provide any further response prior to receipt of their November 14 email which is nearly identical to the November 21 letter, and which similarly did not provide any information on what would be necessary for AMR WP approval. Via November 16 email we replied to MPCA's email agreeing to make the modifications sought in all cases, with one single clarification or exception. By November 19, Jeff Meyers, Navy RPM, had managed to extract 'permission' from MPCA to do the AMR sampling, but with MPCA not elaborating on what obstacles prevented actual approval. Therefore, a revised AMR Work Plan was distributed to team members on November 20 in anticipation of the Monday November 26

start of sampling The revised AMR Work Plan addressed comments from EPA and MPCA. Throughout the process, the Partnering Team had been advised of this start date for field activities.

Remedial Action Work Plan to Produce the 2001 Annual Monitoring Report

The MPCA states that the Navy will need a RAWP for the 2001 Annual Monitoring Report. As explained in the AMR WP and in email (dated November 7), this AMR WP functions as a RAWP for the 2001 AMR sampling. The MPCA cites a list of four documents that the MPCA considers to be the RAWP. These include the AMR WP, Attachment II to MPCA's November 21 letter, Attachment II to the MPCA's June 1, 2001 letter, and the 2001 AMR QAPP.

Regarding the four documents identified by MPCA, the AMR WP includes modifications requested by MPCA's November 21 letter, Attachment II. The AMR WP also contains the AMR QAPP (as Appendix D). The Navy has previously responded to Attachment II to the MPCA's June 1 letter via our August 2 letter to your attention. We currently await MPCA's reply to our August 2 responses. Because MPCA has not yet addressed the responses, this material is not available for inclusion in the AMR WP.

The MPCA says that it is not necessary for the Navy to produce or submit this RAWP for MPCA staff review and approval. Actually, as explained in recounting above last year's events, the Navy feels it is imperative for the MPCA staff to review and approve the AMR WP. This team operates by consensus. Our Facilitated Partnering process would seem to require that all members of this Team should willingly be taking ownership of work plans, especially for FFA deliverables, to prevent any potential for recurrence of last year's events. Disturbingly, MPCA's instruction also conflicts with the FFA. The FFA requires that the RAWP be prepared in 'Consultation with US EPA and MPCA' which is defined by the FFA to require review and comment by US EPA and MPCA. The FFA defines the RAWP as a Primary Document for this purpose (See Section XIV, 14.2 and Attachment B of the FFA).

Please See Attachments I and II of this letter for address of specific issues identified by MPCA. The issues which are repetitive of MPCA's November 14 email have already been included in the revised AMR WP issued on November 20.

With nearly four months since the Navy's proposal to produce an AMR Work Plan was put on the table, and with nearly six months since the MPCA's rejection of the prior AMR data and resulting recognition of the need for the Team to perform at a higher level in this matter, this Team should have been able to reach consensus on a work plan to perform this year's AMR sampling. This is especially evident in light of the Team's awareness of last year's failures, and in light of the use of the addendum process based on the recently approved Veg Oil Work Plan. Completion of an updated RAWP to enable 2002 sampling will require significantly improved Team performance.

Please call me if I can elaborate any further on the discussions provided. We can discuss these issues at MPCA's convenience, including the December 12 Team meeting.

Sincerely,

Mark Sladic P.E.
Task Order Manager

MS/kf

Enclosure

cc: Jeff Meyers, SOUTHDIV
Joel Sanders, SOUTHDIV
John Aubert, NAVSEA
Tom Bloom, USEPA
Doug Hildre UDLP
Paul Walz, BayWest
Richard Harris, RAB Co-Chair
Keith Henn, TtNUS
Mark Perry/File 7842 TtNUS
Debra Wroblewski TtNUS (Cover Letter Only)

ATTACHMENT I

Modifications to the Report Entitled "2001 Annual Monitoring Work Plan", Dated October 2001

1. **Comment: Section 4.1 OBJECTIVES**

   The MPCA staff requests that the Navy add Section 4.1 OBJECTIVES, (page 4-1 4-2) to the 2001 Annual Monitoring Work Plan. These are the objectives of ground water monitoring.

   Response: The objectives for groundwater monitoring were added to Appendix G of the AMR WP.

2. **Comment: Section 4.3.2, Preliminary Fields Work**

   The MPCA staff requests that the Navy add Section 4.3.2, Preliminary Fields Work. This section includes methods for water level measurements of monitoring wells; extraction wells; Fridley Well No. 13, and the Mississippi River. Water levels are required to determine volumes of water to be purged for each well and to construct equipotential maps for the Annual Monitoring Report.

   Response: We believe that an adequate level of detail regarding reading water levels in monitoring wells is already available in the Veg Oil Work Plan. Monitoring wells water level readings are the primary source of data for constructing equipotential maps. Since the Veg Oil Work Plan is approved by MPCA, there does not appear to be an issue.

3. **Comment: Section 4.3.2.2 Purging, Stabilization, and Field Tests**

   The MPCA staff requests that the Navy add Section 4.3.2.2 Purging, Stabilization, and Field Tests, Extraction Wells (page 4-22) and Fridley Well No. 13 (page 4-22). These sections describe how the extraction wells and Fridley Well No. 13 will be purged.

   Response: Information detailing the purging and stabilization of the extraction wells and Fridley Well 13 has been added to Appendix G of the AMR WP.

4. **Comment: Section 4.3.3, Sample Collection and 4.3.3.2, Extraction Wells (page 4-25).**

   The MPCA staff requests that the Navy add Section 4.3.3 – Sample Collection; 4.3.3.2 and 4.3.3.2 Extraction Wells (page 4-25). These sections describe how samples will be collected for the extraction wells and Fridley Well No. 13.

   Response: Information detailing the sample collection from the extraction wells and Fridley Well 13 has been added to Appendix G of the AMR WP.

5. **Comment: Section 4.3.3.4, Field QA/QC Samples**

   The MPCA staff requests that the Navy add Section 4.3.3.4 Field QA/QC Samples. This section describes samples collected for blank, duplicate, and matrix spike samples. If this section adequately addresses AMR sampling in the new AMR QAPP, it is not necessary to include this section here.

   Response: Information on QA/QC samples is already incorporated in the Veg Oil Work Plan, which is a component of the AMR WP. This is because the AMR WP is an addendum to the Veg Oil Work Plan. Please advise if the level of detail in the Veg Oil Work Plan is insufficient.

6. **Comment: Section 4.3.4, Investigation Derived Waste (IDW) Handling**

The MPCA staff requests that the Navy add Section 4.3.4 Investigation Derived Waste (IDW) Handling (page 4-28). This section describes proper handling of referenced wastes. If this section adequately addresses AMR sampling in the new AMR QAPP, it is not necessary to include this section here.

Response: Information detailing IDW disposal has been added to Appendix G of the AMR WP.

7. **Comment: Section 4.3.5 Documentation; Section 4.3.5.1 Sample Identification (page 4-28); Section 4.3.5.2 Chain-Of-Custody (page 4-29 and 4-30); Section 4.3.5.3 Field Activity Documentation and Logbooks (page 4-30 and 4-31; and Section 4.3.6 Sample Preparation, Handling and Transport (page 4-31 and 4-32)**

The MPCA staff requests that the Navy add Section 4.3.5 Documentation; Section 4.3.5.1 Sample Identification (page 4-28); Section 4.3.5.2 Chain-Of-Custody (page 4-29 and 4-30); Section 4.3.5.3 Field Activity Documentation and Logbooks (page 4-30 and 4-31; and Section 4.3.6 Sample Preparation, Handling and Transport (page 4-31 and 4-32). If these sections adequately address AMR sampling in the new AMR QAPP, it is not necessary to include these section here.

Response: Information on documentation, and sample preparation, handling and transport is already incorporated in the Veg Oil Work Plan. Please advise if the level of detail in the Veg Oil Work Plan is insufficient.

8. **Comment: Section 4.4 DATA REDUCTION AND VALIDATION AND STATISTICAL EVALUATIONS, 4.4.1 Data Reduction and Validation, 4.4.11**

The MPCA staff requests that the Navy add Section 4.4 DATA REDUCTION AND VALIDATION AND STATISTICAL EVALUATIONS; Section 4.4.1 Data Reduction and Validation; and Section 4.4.11 Field Measurements and Activities (p. 4-33). These sections describe how raw field data will be recorded in field books.

Response: Information on data reduction and validation and statistical evaluations is already incorporated in the Veg Oil Work Plan. Please advise if the level of detail in the Veg Oil Work Plan is insufficient.

9. **Comment: Section 4.5, REPORTING AND RECORD KEEPING and Section 4.5.1, Periodic Monitoring Reports and Progress Reports**

The MPCA staff requests that the Navy add Section 4.5 REPORTING AND RECORD KEEPING and Section 4.5.1 Periodic Monitoring Reports and Progress Reports (page 4-35 to 4-36). Describe how the Navy will provide data to MPCA and U.S. EPA.

Response: Information on reporting and record keeping is already included in the AMR Work Plan.

OTHER ISSUES

1. **Comment:** Paul Estuesta has reviewed the sampling protocol for the Vegetable Oil Study and has determined that it is consistent with the MPCA method of sampling monitoring wells.

   Response: The Navy requests clarification on whether 'is consistent with' is equivalent to 'is approved'.

2. **Comment:** We understand that the sampling will begin during the week of November 26th and MPCA staff intends to meet with field sampling personnel to review sampling procedures. It is our intention to collect sample splits during this sampling round.

   Response: The MPCA has indicated it will collect sample splits. The Navy requests that if MPCA will ask the Team to compare the resulting data to the Navy's data, then the MPCA needs to provide their QAPP to the Team.

ATTACHMENT II

Additional Item from the
"Remedial Action Work Plan,"
Dated March 2000

1. **Comment: Section 4.5.2, Annual Monitoring Report**

   The MPCA staff requests that the Navy add Section 4.5.2, Annual Monitoring Report. This section describes the overall global objectives of the Annual Monitoring Report.

   Response: Section 7.0 of the AMR WP specifies that data will be presented in the 2001 AMR, which will be similar to previous AMRs.

2. **Comment: Section 4.5.3, Retention of Records**

   The MPCA staff requests that the Navy add Section 4.5.3, Retention of Records. This section describes retention of records for the Annual Monitoring Report.

   Response: The FFA requires that records be retained. This information is already available in the FFA.

3. **Comment: Section 5.0, NPDES/SDS EFFLUENT MONITORING**

   The MPCA staff requests that the Navy add Section 5.0 NPDES/SDS EFFLUENT MONITORING, (page 5-1 to 5-12). This section describes methods for NPDES/SDS sampling. If this sampling is to be done during this field effort include this section in the work plan. If this sampling will not be done at this time it will need to be done under separate work plan.

   Response: NPDES sampling is required by the NPDES Permit, not the RAWP. Although for convenience, the results may be presented in the AMR, the AMR (and AMR sampling) is an FFA requirement and the NPDES sampling is a requirement of the NPDES permit (i.e., NPDES sampling for this year is required even if the Team never agrees on AMR sampling). NPDES sampling is not a part of AMR sampling and will not be detailed in this AMR WP.

4. **Comment: APPENDIX A, NPDES/SDS PERMIT AND MCES INDUSTRIAL DISCHARGE PERMIT**

   The MPCA staff requests that the Navy add APPENDIX A, NPDES/SDS PERMIT AND MCES INDUSTRIAL DISCHARGE PERMIT if NPDES/SDS sampling is to be done in this field effort. If this sampling will not be done at this time, it will need to be done under separate work plan.

   Response: See response to the previous comment.