

# Minnesota Pollution Control Agency

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

November 21, 2001

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

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Sanders:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled "2001 Annual Monitoring Work Plan," dated October 2001. The 2001 Annual Monitoring Work Plan is for Operable Unit 1 (OU1) of the Naval Industrial Reserve Ordnance Plant (NIROP) Superfund Site and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency (U.S. EPA), and the U.S. Navy (Navy).

## **2001 Annual Monitoring Work Plan**

The MPCA staff hereby modifies the 2001 Annual Monitoring Work Plan pursuant to Attachment I of this letter.

## **Remedial Action Work Plan to produce the 2001 Annual Monitoring Report**

The Navy will need a Remedial Action Work Plan (RAWP) for the 2001 Annual Monitoring Report. Instead of producing this RAWP as a separate document, the MPCA staff requests that the Navy use elements of other documents (identified below) for the RAWP for the 2001 Annual Monitoring Report. It is not necessary for the Navy to produce or submit this work plan for MPCA staff review and approval. The following is a list of those documents (or parts of documents) that the MPCA staff considers the RAWP for the 2001 Annual Monitoring Report:

1. The 2001 Annual Monitoring Work Plan as modified by Attachments I to this letter;
2. Attachment II to this letter;
3. Attachment II to the MPCA staff letter dated June 1, 2001 (copy attached); and

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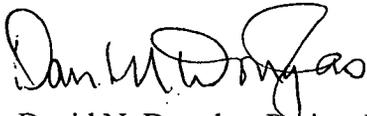
Note this attachment is a list of issues from the 2000 Annual Monitoring Report, dated March 2001, that the MPCA staff requested that the Navy address in the next Annual Monitoring Report (e.g., the 2001 Annual Monitoring Report).

4. The Quality Assurance Project Plan (QAPP) for the 2001 Annual Monitoring Work Plan as approved by U.S. EPA.

The MPCA staff did not review the QAPP portion of the 2001 Annual Monitoring Work Plan as, by agreement with U.S. EPA, U.S. EPA took the lead in the review and approval of the QAPP. The MPCA staff reiterates that there must be an U.S. EPA approved QAPP in place before the ground water samples are collected.

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

Sincerely,



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

DND:csa

Enclosures

cc: Jeff Meyers, US Navy (w/enclosures)  
Thomas Bloom, U.S. EPA (w/enclosures)  
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosures)

## Attachment I

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

The MPCA staff requests that the following sections from the "Remedial Action Work Plan," dated March 2000, be added to the 2001 Annual Monitoring Work Plan. These changes are only for conducting the proposed field sampling activities that include sampling the monitoring wells; pumping wells; and Fridley Well 13.

#### **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.

#### **Section 4.3.2, Preliminary Fields Work**

The MPCA staff request 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.

#### **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.

#### **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.

#### **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.

#### **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.

#### **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 sections here.

#### **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.

#### **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). Describes how the Navy will provide data to MPCA and U.S. EPA.

#### **OTHER ISSUES**

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.

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.

## **Attachment II**

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

#### ***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.

#### ***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.

#### **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.

#### **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.