



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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November 01, 2002

Mr. Gary Schafer (SRF-5J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

SUBJ: RESPONSES TO U.S. EPA COMMENTS ON THE COMPLETION REPORT LETTER FOR EXCAVATION OF PAH CONTAMINATED SOIL IN AREA A4 OF THE NORTH 40, NAVAL INDUSTRIAL RESERVE ORDNANCE PLANT FRIDLEY, FRIDLEY, MINNESOTA.

Dear Mr. Thomas:

Southern Division, Naval Facilities Engineering Command has reviewed your comments on the subject document and is pleased to provide you with these responses. We believe all your comments have been adequately addressed and a revised completion letter is included for your final approval.

1. **PAGE 1, SECOND PARAGRAPH, SECOND-TO-LAST SENTENCE.** Please provide the total volume of soil removed in terms of cubic yards, as was outlined in Section 5.1.3 of the Action Memorandum. This is necessary as the Non-Hazardous Waste Manifest in Appendix "A" shows a volume expressed as 45 yards, and the Special Waste Disposal Application in Appendix A shows an anticipated volume of 60 tons.

Response: The total volume of soil excavated and disposed of is 45 cubic yards as noted on the manifest. The completion letter report has been revised to reflect the quantity. The Special Waste Disposal Application shows an estimated volume of 60 tons, because at the time of application it was estimated higher so the Navy would not require additional approval should the quantity of soil increase in the field due to additional excavation.

2. **PAGE 1, SECOND PARAGRAPH, LAST SENTENCE.** In the text, please provide the date that the roll-off containers were shipped off-site.

Response: The roll-off containers were shipped off-site on August 06, 2002. The text in the completion letter report has been revised appropriately.

2.3. PAGE 1, THIRD PARAGRAPH, FIRST SENTENCE. Is there any certification information available for the material that was used as backfill? If so, please provide this as an attachment to this letter.

Response: The backfill was obtained from Aggregate Industries in Eagan, MN. Certification from Aggregate Industries, indicating that the backfill material is from a virgin source containing no contaminants, is attached as requested. The completion letter report has been revised to reflect this information and a new attachment (Attachment E) is included to provide the backfill certification information.

4. PAGE 1, LAST PARAGRAPH. Prior to this paragraph, a new paragraph should be inserted which provides all of the relevant details on the collection of the waste characterization sampling. For example, when did the sampling occur? Was an individual sample collected from each roll off box, or was a composite submitted? Who collected the sample? Where was the sample material sent for waste characterization analysis? What types of analyses were conducted, etc.

Response: One waste characterization soil sample was collected, as specified in CH2MHILL's work plan letter (dated June 20, 2002), on June 25, 2002 by Alan Bowles of Baywest. This grab soil sample was collected at the center of the excavation, where the previous sample indicated highest contamination. This soil sample was sent to Severn Trent Laboratories (STL) in University Park, IL for analysis. This soil sample was analyzed for TCLP (VOC, SVOC, Pesticides, Herbicides, and Metals) and reactivity, corrosively, and ignitability as specified in CH2MHILL's workplan letter (dated June 20, 2002). The completion letter report has been revised to include this information.

5. CONTRACTOR DEMOBILIZATION. In the appropriate paragraph of the Navy's choosing, please provide the date that the contractor demobilized from the site, as was done for the mobilization date.

Response: The contractor demobilized from the site on August 06, 2002 after the roll-off containers were shipped off-site. The text in the completion letter report has been revised appropriately.

6. ATTACHMENT A, SPECIAL WASTE DISPOSAL APPLICATION. According to Section 3, Properties Of Waste, on the first page of the Special Waste Disposal Application, the soil exhibited a pH of 9.1-12.4. However, the pH field in Section 5, Chemical Characteristics, on the second page of this Application has only a straight line through it, and no other information is provided in Attachment B regarding the pH. Please provide the relevant supporting information, which documents pH.

Also, the fields for PCB's and TPH in Section 5 of this Application have lines through them, and no information is provided, suggesting these were not analyzed for. However the Generator Analytical Certification Form states that the waste does not contain regulated concentrations of PCBs or TPH. Please provide the data, which serves as the basis for this certification.

Similarly, the fields for Toluene, Ethyl Benzene and Xylene in Section 5 of this Application show "ND", which a footnote included below Section 5 shows to be non-detect. However, the table of Waste Characterization Analytical Data in Attachment B provides no information on these parameters. Please provide the basis for this certification.

After reviewing Attachment A, and comparing it to Attachment B, it would appear that Attachment B currently provides only the TCLP results, and that other analyses were performed (as reflected in the "Total" ppm column in Attachment A) which have not been provided. Please provide these additional results. By including another spreadsheet in Attachment B, the Navy should be able to address all of the above questions for Attachment A.

Response: The pH of the soil is 8.4 Standard Units as determined by the soil sample collected on June 20, 2002 and the data is included in Attachment B. The pH range in the Special Waste Disposal Application was incorrectly identified. However, the waste disposal facility has received and reviewed the data included in Attachment B. They will accept the soil with pH > 2 and <12.5.

PCBs and TPH were not chemicals of concern for this area based on the investigations and previous data for soil from the general vicinity have been tested to contain no PCBs or TPH above regulated concentrations. Therefore, based on generator knowledge of the process and wastes generated at this site and the small quantity of soil generated, the generator certification was provided. Please note that most of the non-hazardous soil generated from NIROP from previous investigations and removal actions have been disposed of at the Waste Management Elk River Landfill.

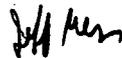
The results of Toluene, Ethyl Benzene and Xylene, and other analyses (reflected in the "Total" ppm column in Attachment A) are from previous investigation (Sample #AB032A) collected on June 09, 1992. This data is included in OU2 RI Report. The completion letter report has been revised to reflect this information and the data from Sample #AB032A has been included in Attachment B.

7. **ATTACHMENT A, GENERATOR ANALYTICAL CERTIFICATION FORMS.** Two Generator Analytical Certification Forms have been provided in this attachment, suggesting multiple analytical samples were collected. However, Attachment B, Waste Characterization Analytical Data, only provides TCLP results for one sample. This leads to a great deal of confusion. Please clarify if there were multiple forms for multiple samples. Alternatively, if there are multiple copies of the same form in this document due to collation problems, please remove the extraneous copy

Response: Two Generator Analytical Forms were included inadvertently. The extraneous copy of this form has been removed from the revised completion letter report as suggested.

If you have any questions regarding this letter, please feel free to contact me at (843) 820-5609.

Sincerely,



Jeff Meyers, PE, CHMM
Remedial Project Manager

Copy to:

David Douglas, MPCA

John Betcher, MPCA

Doug Hildre, UDLP

~~Mark Sladic, TetraTech NUS~~

Venky Venkatesh, CH2MHILL