



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 15, 2005

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn.: Dan Owens, Code ES32
P.O. Box 190010
North Charleston, SC 29419-9010

RE: Naval Industrial Reserve Ordnance Plant Superfund Site

Dear Mr. Owens:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the document entitled, "Response Action Work Plan," ("RAWP") dated June 30, 2005. The RAWP is for Operable Unit 1 of the Naval Industrial Reserve Ordnance Plant Superfund Site and was submitted pursuant to the Federal Facility Agreement, dated March 27, 1991, between the MPCA, the U.S. Environmental Protection Agency, and the U.S. Navy (Navy).

The MPCA staff hereby modifies the RAWP pursuant to Attachments I and III of this letter. Please find comments to the RAWP in Attachment II and IV to this letter. The Navy does not necessarily need to make modifications to the RAWP based on comments in Attachment II and IV.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David N. Douglas".

David N. Douglas, Project Manager
Superfund Unit 2
Superfund and Emergency Response Section
Remediation Division

DND:csa

cc: Tom Smith, U.S. EPA (w/enclosures)
Mark Sladic, Tetra Tech NUS, Inc. (w/enclosures)
Venky Venkatesh, CH2M HILL Constructors, Inc. (w/enclosures)

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Attachment I

Modifications to the Report Entitled "Response Action Work Plan,"

Volume I

Dated June 30, 2005

Volume I, Remedial Action Monitoring Plan

Section 4.1, Objectives, ninth bullet, page 4-1

The MPCA staff's position does not approve of this objective of the RAWP. The MPCA staff position on this matter can be found in MPCA staff response to "Section 6.1, SUMMARY AND CONCLUSIONS, General Observations, page 6-2, bullet 2" of the MPCA staff response to the 2004 Annual Monitoring Report, dated June 16, 2005.

Section 4.1, Objectives, tenth bullet, page 4-2

The bulleted items are not decision rules. The MPCA staff requests that the Navy identify these items as topics instead.

Tables of Chapter 4

The MPCA staff requests that monitoring well MS-46S be deleted from all tables based on the rationale found in "Section 6.1, SUMMARY AND CONCLUSIONS, Shallow Monitoring Interval, page 6-2, bullet 1, Monitoring Well MS-46S" of the MPCA staff response to the 2004 Annual Monitoring Report, dated June 16, 2005.

Appendix A, NPDES/SDS Permit, Chapter 7, Section 3, Reporting

While the Navy has been reporting NPDES system problems in the Annual Monitoring Reports, the NPDES permit requires that the Navy report system problems pursuant to Section 3 of the "Final Revised NPDES/SDS Permit No. MN 0000710, dated October 2, 2003. The Belinda Nicholas of the MPCA NPDES staff has informed me that the NPDES staff is not receiving reports of system problems. The MPCA staff requests that the Navy rectify this problem and begin complying with these reporting requirements of the NPDES permit.

Attachment II

**Comments to the Report Entitled
"Response Action Work Plan,"
Dated June 30, 2005**

Volume I, Remedial Action Monitoring Plan

None.

Attachment III

Modifications to the Report Entitled "Response Action Work Plan," Volume II, Quality Assurance Project Plan Dated June 30, 2005

Volume II, Quality Assurance Project Plan

Signatory Page

As the Navy is aware, all parties must sign the signatory page of the QAPP. Columbia Analytical Services, in particular, must read the QAPP and agree to it, as CAS is agreeing to language that was written for Enchem.

References

The MPCA staff requests that the Navy check all references to ensure they are accurate as there are references to the Enchem Quality Assurance Manual by chapter that were not changed in this redline. It may be that the chapters match up between the Columbia Analytical Services' (CAS) and the Enchem QA Manual, but this should be checked regardless.

DQOs

How will Tetra Tech NUS, Inc. consolidate information and report on progress towards meeting the DQOs discussed in the letter from Mark Sladic, dated July 20, 2005? This letter discusses precision, accuracy, completeness, etc. but does not get to the heart of the issue of whether or not the DQOs being answered or addressed. Also the MPCA staff requests that this matter be discussed in the AMR conclusions.

Figure A4-1

In figure A4-1, the MPCA staff requests that the Navy list the CAS/Kelso laboratory contact name.

Table A6-3

The MPCA staff requests that the Navy reduce the reporting limit for tetrachloroethene to 3.8 ug/l to match the Daily Maximum Limit.

Table A7-1

The limits present in Table A7-1 are reasonable in most cases, but some of them are below 50% and a few even at 10%. This is unacceptable to the MPCA for MS/MSD or LCS limits. If the laboratory chooses to use these limits - that may be their internal SOP - the validation and data review will require that data below 50% be rejected and require the flagging of data between that point and 70% recovery.

Table A7-2

In Table A7-2, it was noted that matrix spikes are only being done on a ratio of 1:20 samples. The MPCA standard is 1:10 samples for spikes; the MPCA staff requests that the Navy change to the MPCA standard and record the change in this table.

Section B2.1

In Section B2.1, the MPCA staff requests that the Navy specify what field meter will be used. Do not put "may be" but instead put "is" back in this section.

Attachment IV

**Comments to the Report Entitled
"Response Action Work Plan,"
Volume II, Quality Assurance Project Plan
Dated June 30, 2005**

Volume II, Quality Assurance Project Plan

General Comment

The MPCA staff requests that the Navy ensure that CAS can reach the required limits on site. It appears CAS can do this without modification to method 8260B, but Navy should verify this with the laboratory QA staff.