



Minnesota Pollution Control Agency

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

September 21, 2005

Mr. Douglas Hildre, P.E.
Environmental Affairs Manager
BAE Systems
Armament Systems Division
4800 East River Road
Minneapolis, MN 55421-1498

RE: Draft Corrective Measures Work Plan
Corrective Action Agreement

Dear Mr. Hildre:

The Minnesota Pollution Control Agency (MPCA) staff has reviewed the draft Corrective Measures Work Plan, dated August 15, 2005, that was submitted pursuant to the Corrective Action Agreement between the MPCA and United Defense, L.P., dated March 24, 2003.

The MPCA staff hereby approves the draft Corrective Measures Work Plan as modified by Attachment I to this letter.

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

Sincerely,

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

DND:csa

cc: Thomas Smith, U.S. Environmental Protection Agency
Dan Owens, US Navy
David Brayak, Tetra Tech NUS, Inc.

Attachment I
Modifications to the Report Entitled,
“Draft RCRA Corrective Measures Study Work Plan,”
Dated August 15, 2005

2.0 Corrective Measures Objectives, page 2-1

The work plan states that the point of compliance is the Armament Systems Division Plant boundary. Given the distribution of the Naval Industrial Reserve Ordnance Plant plume at the property boundary, this proposed boundary is not an appropriate compliance boundary to monitor the Former Paint Shop area plume. The MPCA staff requests that BAE Systems move the compliance boundary of Former Paint Shop closer to the Former Paint Shop area and utilize some of the existing Former Paint Shop area plume wells as compliance points. The MPCA staff requests that the narrative of this section be modified accordingly.

2.0 Corrective Measures Objectives, page 2-1

BAE Systems states that buildings and pavement are expected to control future releases from the Former Paint Shop area by eliminating infiltration. Although this is true to some degree, a plume has been released from this area despite the cover provided by the buildings and pavement. There are other mechanisms at play that may have caused releases from this area, e.g., seasonally fluctuating water table; gradients due to pumping of ground water; vapor movement; sorption; and desorption from soil particles; and product contained in the soil. There may be additional factors. The statement, as written, implies that the buildings and pavement alone will control future releases from the Former Paint Shop area. The MPCA staff requests that BAE Systems modify the narrative of this section to acknowledge that there are other mechanisms that may account for the releases.

4.2 Attain Media Cleanup Standards, page 4-1

The MPCA staff requests that BAE Systems modify this section to include narrative that identifies all cleanup goals cited in Section IV, Remedy Actions, Subsection ARARs Cited in the ROD; Subsection To Be Considered Cited in the ROD, and Subsection ARARs Not Cited in the ROD of the CERCLA Five-Year Review Report for the FMC Site, dated March 17, 2004, e.g., the Safe Drinking Water Act (40 CFR Parts 141 – 146).