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NIROP FRIDLEY
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U S NAVY COMMENTS ON PUBLIC HEALTH ASSESSMENT FOR NIROP FRIDLEY MN
4/12/1999
TETRA TECH



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PITT 04-9-084

April 12, 1999

Ms. Lisa Pogoff
Community Relations Coordinator
Minnesota Department of Health
121 E. 7th Place
P.O. Box 64975
St. Paul, Minnesota 55164-0975

Subject: U.S. Navy Comments to the Public Health Assessment
for the Naval Industrial Reserve Ordnance Plant
Fridley, Minnesota

Dear Ms. Pogoff:

On behalf of the US Navy, Southern Division NAVFACENGCOM, Tetra Tech NUS is providing the following comments to the Public Health Assessment for the Naval Industrial Reserve Ordnance Plant, located in Fridley Minnesota. The document was published on December 24, 1998.

1. Cover page – 'Cerclis' is an acronym and should be capitalized: 'CERCLIS'
2. Summary: Fourth Paragraph, Third Sentence - It has not been positively identified to date that the plumes do combine. Therefore, it is misleading to say that 'a portion of the ground water plume has reached MWW property', in reference to a plume being described as 'migration underground from NIROP and the UDLP/FMC property.' This statement is inaccurate if the plumes do not meet. Please clarify this statement.
3. Summary: Fourth Paragraph, Fourth Sentence – The meaning of the statement 'nearer to the MWW than the overland distance' is unclear.
4. Summary: Fifth Paragraph – Since the Prairie duChien is discussed, it would be helpful to provide the proper context. That is, to identify the routine non-detects at four of five on-site wells, plus the likelihood of contamination from a neighboring site being responsible for PCE detects at the fifth (upgradient) well.
5. Summary: Sixth Paragraph – The last two sentences are irrelevant to the OU-2 discussion and should be discussed under a separate heading. Further, the classification of 'buried drums' to characterize the waste is misleading since it is most likely that the material is a result of a 1965 cleanup action following severe tornado damage to the plant. A review of plant photos after the tornado shows that it is highly likely that some drums were in fact mixed into the substantial volume of debris, which included structural members, roofing materials, and other massive items. Note that drums are frequently used in a manufacturing plant setting without any hazardous waste association. Finally, per documentation on site at UDLP, the 'dump' was originally permitted in 1971 to FMC only, for foundry sand placement, and not in any way to the Navy, and is not necessarily even associated with the tornado debris emplacement action. MDH has not effectively described the current state of affairs in Anoka Park, potentially leaving the reader to wonder if a large cache of drums with liquid material is present, leaching into groundwater aquifers or the Mississippi River. Neither EPA, MPCA, or the Navy thinks this is likely based on the current information, and the Health Assessment would do a service to the reader to say so.
6. Summary: Seventh Paragraph – The TCE concentrations identified were collected from temporary well points. MDH would be providing a useful context to identify that the concentrations identified were not found to be wide-spread. Additionally, ug/L is not a viable unit of measurement for soil contamination.
7. Figure 4 – (Although this is the first figure in the report, it is titled Figure 4.) The scale for this map should be checked – if it is accurate, the main NIROP building is only 500 x 500.

8. Figure 2 – The scale for this map also should be checked. The legend states that 'one inch = 2000 feet', yet, compared to the graphic bar, one inch equals only 1600 feet.
9. Page 8, Fourth Paragraph, First Sentence – The sentence states that the plumes do mix. We do not believe that any technical evaluation has determined to date that the plumes do mix.
10. Page 10, A.1.a – We believe the NIROP ROD was signed on March 25, 1991 by the Navy, March 26, 1991 by MPCA, and March 27-28, 1991 for the US EPA.
11. Page 10, A.1.a, Second Paragraph – The text identifies the 'current' status of remedy to be an operating Phase I. In fact, Phase II is operating. Also, the discussion of Phase I ignored the fact that a pretreatment system was originally required for the extracted groundwater prior to discharge to the sanitary sewer.
12. Page 12, Second Paragraph – The text should clarify that the trenches were various lengths, but were typically eight to ten feet deep.
13. Page 14, A.1.c – The text states that remedial investigation and feasibility study field work is complete. Actually, the Navy feels that remedial investigation work is complete, but EPA and MPCA have not concluded their review and concurred to date. Also, feasibility study field work could yet be required in the form of pilot testing or treatability studies, for OU-2 and/or OU-3.
14. Page 14, A.1.d, Second Paragraph – It is more accurate to say that 'The soil gas extraction system began operating in 1993...'
15. As the Navy's contractor, we are not tasked with reviewing the portions of this report solely addressing UDLP/FMC, therefore we are not indicating either agreement or disagreement with this discussion.
16. Page 30, B – We suspect that the site visit occurred on April 22, 1998 (instead of 1997).
17. Page 31, C, First Paragraph – In the fifth sentence, it is not appropriate to describe the material in the park as 'NIROP foundry sand'. In a 1991 letter addressed solely to FMC, MPCA grants FMC permission to deposit foundry sand in the park. Neither the Navy or NIROP is the addressee of the letter, and therefore the material cannot be accurately referred to as NIROP foundry sand.
18. Page 31, C, Third Paragraph – It is not apparent that the NIROP ROD determines that site related contaminants were impacting the MWW's water supply intakes, only that there were 'releases and threatened releases to the environment.'
19. Page 33, Second Paragraph – The information that two river samples had peaks present for vinyl chloride is not meaningful. Potential contaminant concentrations that are not quantifiable are speculative and are not appropriate for inclusion in a fact-based discussion. If there are no measured concentrations, the text should say so.
20. Page 33, D, First Paragraph – The discussion is not suitably developed and can leave the reader with the impression that MDH has concluded that NIROP contamination has been identified in Fridley Well 13 groundwater. Additionally, the discussion should add that Fridley Well 13 is located upgradient from NIROP, and should identify specific contaminants and concentrations detected in this well, since it is a drinking water production well, and is therefore of heightened interest to the public.
21. Fridley Well 13 is not shown on Figure 17, and this would be helpful to the reader.
22. Page 33, Second Paragraph – There is no Figure 20.
23. Page 33, Second Paragraph – There is no Figure 21.
24. Page 37, First Paragraph – There are no Figures 22 and 23.
25. Page 38, First Paragraph – The text again discusses NIROP contamination identified at the MWW intakes. We would again assert that the NIROP FFA does not make mention of this situation.
26. Page 43, Conclusions, 1 – In this discussion, the MDH would do the reader a service to reiterate that the maximum detection of TCE in intake water was only 1.3 ug/L, in comparison to the MCL of 5 ug/L.
27. References – The text throughout the report identifies information collected from the 1996 and 1997 Annual Monitoring Reports for the NIROP monitoring wells, yet the reference list does not identify these.

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28. Appendix D – Data is provided with accompanying qualifiers. There is no key or explanation to help the reader interpret the qualifiers or their significance.

Please feel free to call me at (412) 921-8216 with any questions or to provide clarification regarding these comments. Thank you for the opportunity to review this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Sladic', written in a cursive style.

Mark Sladic, P.E.
Project Manager

MS/gp

cc: Joel Sanders, Southdiv
Dave Douglas, MPCA
Tom Bloom, EPA
Kerry Morrow, NAVSEA