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NTC ORLANDO  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS TO ABRIDGED DRAFT  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN FOR OPERABLE  
UNIT 1 (OU 1) NORTH GRINDER LANDFILL NTC ORLANDO FL  
11/1/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

09.01.01.0003

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Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

November 1, 1994

Mr. Wayne Hansel  
Code 18B7  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Abridged Draft Remedial Investigation/Feasibility Study  
Workplan for Operable Unit 1 (North Grinder Landfill),  
NTC Orlando.

Dear Mr. Hansel:

I have completed the technical review of the subject document dated October 1994 (received October 13, 1994). Since the copy presented at the latest BCT meeting on October 13 was abridged, the review comments here will only be general. Specific comments will be reserved until an unabridged Draft copy is submitted.

Overall, the consideration of a presumptive remedy at OU-1, which considers a landfill cap to include source area groundwater and surface water control, leachate collection and treatment system, landfill gas collection and treatment, and institutional controls as a means of excluding the exposure pathways for humans or ecological receptors in the Baseline Risk Assessment, is acceptable with the following considerations:

1. In order to substantiate the need for a landfill cap, Section 2.7.2.2 (Human Health Preliminary Risk Evaluation) should include a "qualitative" human health and ecological risk assessment, which documents that direct human and ecological risk will exist unless an appropriate landfill cap is installed and maintained.
2. The landfill cap is constructed to high enough standards so as to prevent direct human and ecological contact with the contaminated landfill material, surface water infiltration and landfill cap erosion.

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Mr. Wayne Hansel  
November 1, 1994  
Page 2

3. The Navy and/or future landowners will be held responsible for maintaining (and future upgrading if warranted) the integrity of the cap, leachate collection system and landfill gas collection system.
4. Institutional controls, such as Deed Restrictions, should identify the landfill as a component of this parcel of land; inform future owners of the problems associated with landfills such as soil and groundwater contamination, instability and possible explosive gases; and should restrict the building of facilities on this parcel of land that would jeopardize human health or the environment due to the presence of the landfill and associated waste materials.
5. Contrary to the discussion on page 2-36, the Florida Primary, Secondary and minimum criteria or "free from" Water Quality Standards (Chapters 17-520 and 17-550, Florida Administrative Code) are ARARs because they are promulgated rules. The updated 1994 Florida Ground Water Guidance Concentrations booklet contains the Maximum Concentration Levels (MCLs) and numerical interpretations by Departmental toxicologists of the promulgated narrative minimum criteria standard. The Primary and Secondary Drinking Water Standards are established in Chapter 17-550, F.A.C. and promulgated as groundwater standards in Chapter 17-520, F.A.C. For those constituents in the booklet that do not have Primary or Secondary Drinking Water Standards, the Department considers them exceedences of minimum criteria and trigger/screening values for assessment purposes. Furthermore, the Department would consider them cleanup levels unless alternate ones are approved by the Department.

If I can be of any further assistance with this matter, please contact me at (904) 488-3935.

Sincerely,



David M. Clowes  
Remedial Project Manager

/dmc

Mr. Wayne Hansel  
November 1, 1994  
Page 3

cc: LCDR Catherine Ballinger, NTC Orlando  
Craig Brown, USEPA Region 4  
Bill Bostwick, FDEP Central District  
Susan Goggin, FDEP Natural Resource Trustee  
Philip Georgariou, ABB Jacksonville

TJB B JJC JJC ESN ESN