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NTC ORLANDO
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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO THE RESPONSE TO
COMMENTS OPERABLE UNIT 2 (OU 2) REMEDIAL INVESTIGATION/FEASIBILITY WORK
PLAN WITH ATTACHMENT NTC ORLANDO FL

7/3/1996

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Rick Allen

Department of Environmental Protection

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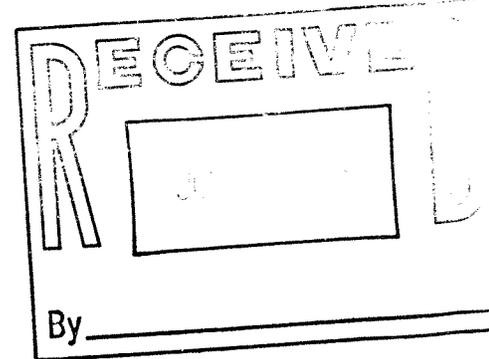
Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 3, 1996

Mr. Wayne Hansel
Code 18B7
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068



RE: Response to FDEP (May 11, 1995) Comments, OU2 RI/FS Work Plan, NTC Orlando.

Dear Mr. Hansel:

I have completed the review of the response to comments, dated May 7, 1996 (received May 9, 1996). Please see the attached memorandum from Greg Brown, and address my comments on your response.

1. Comment 3 - This response is not adequate. It was agreed by the partnering team in the January 1995 meeting that 1 composite sample per acre (99 acres) would be analyzed. This was agreed upon by all parties and must be incorporated into the document.
2. Comment 4 - As stated previously, the state does not accept Remedial Goal Options higher than 1E-6. However, including the USEPA range of 1E-4 to 1E-6 for the purposes of evaluating the ability for a remedial alternative to achieve a specific risk factor is acceptable. If no remedial alternatives can achieve 1E-6 then other risk management decisions (e.g., deed restrictions; institutional controls; etc.) can be made which will achieve 1E-6. The last paragraph of this section should indicate that the state does not except a cancer risk of greater than 1E-6.
3. Comment 5 - Appendix A should also include the "To be Considered" (TBC) guidelines: Region III Soil RBCs; Florida Soil Cleanup Goals (SCG); Region IV Sediment Screening Values (SSV); and the Florida Sediment Quality Assessment Guidelines (SQAG).

I have some additional comments which were not submitted by the previous remedial project manner that have come to my attention upon my review of the document.

4. In Section 3.4.1 (Surface Soil Sampling), the last paragraph indicates pesticide levels will be compared to background.

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This is inappropriate. Organic or anthropogenic constituents are not to be compared to background unless it can be established that elevated concentrations detected at a site are part of an area wide situation that is being addressed as a separate site or under a separate program.

5. Section 5.1.1 (Hazard Identification) also needs to include Applicable Relevant and Appropriate Requirements (ARARs) for identification of Chemicals of Potential Concern (CPCs).

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell
Remedial Project Manager

cc: LCDR Catherine Ballinger, NTC Orlando
Barbara Nwokike, Navy SouthDiv
Oscar "Mac" McNeil, Bechtel
Nancy Rodriguez, USEPA Region 4
Bill Bostwick, FDEP Central District
John Kaiser, ABB, Orlando
Patricia Kingcade, OGC/Trustee File

TJB

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Memorandum

Florida Department of Environmental Protection

TO: John Mitchell, Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section ^B

FROM: Greg Brown, P.E., Professional Engineer II, ^{JE}
Technical Review Section _{JE}

DATE: June 20, 1996

SUBJECT: Responses to Comments; Draft Remedial Investigation and Feasibility Study (RI/FS) Workplan; Operable Unit 2; McCoy Annex Landfill; NTC Orlando; January 1995.

I reviewed the responses to comments for the subject document dated May 7, 1996 (received May 9, 1996). My original comments on the subject document had been given to the Navy about a year ago in a memorandum dated May 5, 1995. I am glad to report that the intervening period was well spent since the responses are adequate for their intent. Please call me if you have any comments.