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LETTER REGARDING REGULATORY REVIEW COMMENTS ON EVALUATION APPROACH TAKEN AT STUDY AREAS 16, 17, 21, 26, 27, 39, 40, 50 NTC ORLANDO FL
2/4/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Department of Environmental Protection

Lawton Chiles
Governor

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

February 4, 1997

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

RE: Approach to Evaluation of Study Areas 16, 17, 21, 23, 26, 27, 39, 40, and 50 with PAH Concentrations Greater than Screening Criteria, NTC Orlando.

Dear Mr. Hansel:

I have completed the review of the above referenced approach dated December 20, 1996 (received December 23, 1996) and provide the following comments.

1. Under Field Investigation on page 2, it states that risks related to PAH concentrations will be based on "average" conditions at a Study Area (SA). What is meant by the word "average." Risk should be based on the 95% UCL or the maximum concentration detected, whichever is lowest.

   Also, the second paragraph indicates directing additional sampling broadly around the site rather then concentrating in areas where contamination was previously detected. I realize this is a method to gain enough samples to perform a preliminary risk assessment, but this should be performed on a case-by-case basis for each SA. Some areas may be better evaluated by delineating a hot spot sampling area.

2. Under Risk Characterization on page 3, it indicates that "exposure point concentrations will be represented by the arithmetic average of all samples." According to USEPA Region IV RAGS, arithmetic averaging is only appropriate for hot spot samples, not all samples. Using all samples requires using the 95% UCL or maximum concentration detected, whichever is less.

3. Further assessment is proposed for Study Area 16 under the IR Program. I thought it was agreed that this study area was to be transferred to the petroleum program as all contamination in this area appears to be petroleum related. However, as TCL/TAL analytical results indicated the PAH contamination, further investigation under the petroleum

program should use TCL laboratory analysis, not analysis from a Flame Ionization Detector (F.I.D.).

4. Under Study Area 17 on page 5, subsurface soil samples are compared to surface soil screening criteria. This should be compared to the leachability criteria.

   I also do not agree with all the proposed additional sampling locations for this SA. A large number of surface soil samples have already been analyzed across the site without exceeding surface soil screening criteria. Some additional broadly spaced samples would be appropriate. However, I believe additional samples should also be focused around previous sampling location 17B035 which had PAH exceedences above the industrial cleanup goals.

5. At Study Area 21 on page 5, only 1 sample in 9 slightly exceeded the industrial soil cleanup goals. However, this SA primarily needed further evaluation based on arsenic exceedences in soil, not PAHs. I suggest one additional sampling location, and a resampling of the lone PAH exceedence location to resolve the PAH issue. However, this will still not resolve the arsenic issue. Any further assessment should include arsenic in the analysis.

6. Under Study Areas 39 and 40 on page 7, I agree with further assessment and delineation of PAHs in surface soil. However, I do not agree with the discussion on industrial deed restrictions as this area is designated for both commercial and residential use. Any evaluation needs to be based on residential risks. PAHs appear to be the only problem in surface soil and some form of interim soil removal may be necessary after PAH delineation is complete. PCE and TCE contamination in groundwater at Study Area 39 will have to be further assessed. A Remedial Investigation report will likely be needed for this SA.

7. It was agreed at a previous OPT meeting that Study Area 50 required no further investigation as the area would be restricted to industrial use. There was no contamination which exceeded industrial soil cleanup goals and the intended reuse of this study area is multi-modal (i.e., industrial).

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: Lt. Gary Whipple, NTC Orlando
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