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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL DRAFT
REMEDIAL INVESTIGATION AT OPERABLE UNIT 3 (OU 3) NTC ORLANDO FL
9/15/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

09.01.03.0006

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

Virginia B. Wetherell
Secretary

September 15, 1998

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

RE: Final Draft Remedial Investigation Report, Operable Unit 3,
NTC Orlando, July 1998

Dear Mr. Hansel:

I have completed the review of the above referenced document dated July 1998 (received July 20, 1998) and provide the following comments:

- (1) For soils, the Department's September 29, 1995 Soil Cleanup Goals (SCGs) for Florida are used as possible screening criteria in the selection of Chemicals of Potential Concern (CPCs). These numbers are obsolete. The Soil Cleanup Target Levels (SCTLs) developed for Chapter 62-785, Florida Administrative Code (F.A.C.), finalized April 30, 1998, should be used instead as these represent the latest calculated risk-based levels. This will have an impact on several areas of the report as well as tables and appendices.
- (2) For groundwater, the Department's June 1994 Florida Groundwater Guidance Concentrations (FGGCs) are used as possible screening criteria in the selection of CPCs. These numbers have been updated as Groundwater Cleanup Target Levels (GCTLs) in Chapter 62-785, F.A.C. These GCTLs should be used instead of the FGGCs as they represent the latest calculated risk-based cleanup target levels. This also will have an impact on several areas of the report as well as tables and appendices.
- (3) The groundwater screening concentration of 50 µg/L for arsenic is incorrectly stated as a FGGC. The number is actually a primary drinking water standard for arsenic.
- (4) It is stated in the report that MCP (potassium (2-methyl-4-chlorophenoxy)propionate) does not have a FGGC. However, the GCTL for 2-methyl-(1,4-chlorophenoxy)propionic acid is

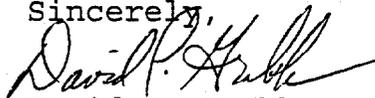
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listed as 7 µg/L. It may be that the two substances are essentially identical and have similar toxicities. This should be investigated to determine if sections and tables in the report should be revised.

- (5) Table 7-19 on page 7-64 states that the FDEP Class III Fresh Water Quality Standard for MCPA is not available. The standard is listed as 72 µg/L in Table 3b in the Technical Report: Development of Soil Cleanup Target Levels (SCTLs) for Chapter 62-785, F.A.C. Surface water standards for several of the other semivolatile organic compounds, pesticides and herbicides, stated as not available in Table 7-19, are also listed in Table 3b of the Technical Report.
- (6) In the Aquatic Receptors section on page 7-27, reproduction of the water flea (*Ceriodaphnia dubia*) in sample 08G01301 is incorrectly compared to sample 08G01601. These samples were not run concurrently. Also, the reproduction numbers are statistically different between the lab control samples that were run concurrently with the two samples.

If I can be of any further assistance with this matter, please contact me at (850) 488-3693.

Sincerely,



David P. Grabka
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando
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