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NTC ORLANDO  
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LETTER REGARDING RESPONSES TO REGULATORY COMMENTS ON ENVIRONMENTAL  
SITE SCREENING REPORT AT STUDY AREA 52 NTC ORLANDO FL  
3/12/1999  
HARDING LAWSON ASSOCIATES

March 12, 1999

Commanding Officer  
SOUTHNAVFACENCOM  
2155 Eagle Drive  
North Charleston, SC 29419-9010

ATTN: Ms. Barbara Nwokike, Code 187300

Subject: **BRAC Environmental Site Screening Report**  
**Study Area 52**  
**Response to Comments**  
**NTC, Orlando**  
**Contract: N62467-89-D-0317**

Dear Barbara:

Attached are our responses to the FDEP comments to the Final Draft BRAC Environmental Site Screening Report, Study Area 52. We hope to discuss these responses in the OPT meeting in Orlando on March 17 and 18.

If you have any questions or need additional information, please call me at (904) 269-7012.

Very Truly Yours,

**Harding Lawson Associates**

Richard P. Allen  
Project Technical Lead

#### Attachments

cc: Wayne Hansel, Southern Division  
Nancy Rodriguez, USEPA Region IV  
David Grabka, FDEP  
Lt. G. Whipple, NTC-Public Works Officer  
Robin Manning, BEI  
Steve McCoy, Tetra Tech/NUS  
Al Aikens, CH2M Hill  
John Kaiser, HLA  
file

## PROJECT REVIEW COMMENTS

**NTC, Orlando Study Area 52  
NTC Orlando  
Final Draft BRAC Environmental Site Screening Report**

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**Florida Department of Environmental Protection - David Grabka (2/10/99)**

1. **Confirmatory sample 052S0005 had appreciable levels of 4,4'-DDD, 4,4'-DDT and dieldrin above the residential and leaching SCTLs at a depth of 2 to 2.5 feet. Figure 4-1 shows this sample location was excavated to 2 feet below land surface, but was outside the area excavated to 4 feet deep. Is the figure incorrect, or was contaminated soil left deeper than 2 feet below surface in this area? Was the water table located at approximately 2 feet below land surface?**

Sample 052S0005 was taken at a depth of approximately 4 feet below land surface, which is the approximate depth of the water table at the time of the IRA. Figure 4-1 and Table B-2 have been revised to reflect this.

2. **The report states in Section 4.1.1.2 that additional immunoassay soil screening was used to screen the soil for further pesticide delineation and to test soil samples collected along the floor of the excavation to determine where additional soil needed to be removed. The locations where additional immunoassay soil screening was conducted should be provided in a figure and the results provided in a table.**

The Environmental Detachment Charleston used immunoassay screening kits to guide excavation activities in the field. After each portion of the excavation was completed, IA test kits were used to confirm that sufficient soil had been removed from the floor of the excavation to meet surface soil screening criteria for chlorinated pesticides. If the IA results exceeded screening criteria, additional soil was removed. If the IA results were below screening criteria, a sample was collected along the floor of the excavation and sent to an offsite laboratory to confirm IA screening results. Thus, the map provided in Figure 4-1 serves to verify that sufficient soil was excavated to meet (residential) surface soil screening criteria, with the exception of samples 052S0005, 052S0007 and 052S0010. These samples were located in an area where soil had been excavated to a depth of approximately four feet, the depth of the water table during the IRA soil removal.

3. **The report incorrectly states the leachability SCTL, based on groundwater criteria, for dieldrin as 8 µg/kg. Per Chapter 62-785, Florida Administrative Code, the leachability SCTL is 5 µg/kg.**

The report has been corrected to reflect the dieldrin leachability SCTL.

4. **Figure 3-1 has two sampling locations labeled 52S002. One of these locations is presumed to be sampling location 52S005, which is missing from the figure. This figure should be corrected.**

PROJECT REVIEW COMMENTS (Continued)

NTC, Orlando Study Area 52  
Orlando, Florida  
Final Draft BRAC Environmental Site Screening Report

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Florida Department of Environmental Protection (Continued)

The figure will be corrected.

5. **The report states that 1,300 tons of soil were removed from the site and hauled by rail to the Michigan Disposal Waste Treatment Plant. Was the soil characterized as hazardous waste? Documentation should be provided in the report to verify proper disposal of the excavated soil.**

The soil was characterized as hazardous waste and the waste characterization report will be included in the final report as Appendix G.

6. **The recommendation that no further soil investigations be conducted will be evaluated based upon the response to the comments above. I concur with the recommendation that a groundwater monitoring program continue, consisting of a source well and a downgradient well. I also concur with the recommendation that Study Area 52 remain classified as 5/Yellow until the groundwater monitoring program demonstrates that contaminants are no longer present at concentrations exceeding GCTLs.**

In accordance with discussions at the February OPT meeting, HLA will finalize the SA 52 report with the recommendation that a groundwater restriction be implemented around monitoring well OLD-52-10 for a radius of 50 feet in the shallow aquifer until dieldrin concentrations decrease below the GCTL. HLA will also recommend that the property be reclassified to 4/Dark Green and be made eligible for transfer. This is consistent with the manner in which Study Area 3 on the Main Base was dealt with when it was made eligible for transfer.