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LETTER REGARDING REGULATORY REVIEW AND CONDITIONAL APPROVAL ON SITE  
ASSESSMENT ADDENDUM BUILDING 369 NTC ORLANDO FL  
4/13/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

April 13, 1999

Mr. Nick Ugolini  
Code 184 (PVC)  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report Addendum, Building 369, Main Base,  
Naval Training Center, Orlando, Florida

Dear Mr. Ugolini:

I have completed my review of the Site Assessment Report Addendum (SARA) and No Further Action (NFA) Proposal for Building 369, Main Base, dated February 17, 1999 (received February 19, 1999). Because of the presence of TRPH in subsurface soils at levels exceeding the Department's residential soil cleanup target level (SCTL), NFA for this site would require conditions on the site that would need to be met before an NFA Approval Order could be issued. The following three options are available for this site:

(1) NFA with institutional controls is pursued. Institutional controls would include deed restrictions prohibiting the bringing of contaminated soil to the surface where people may be exposed to the contaminants. The deed restrictions would also require the proper disposal of the contaminated soil if excavated. Deed restrictions are required to be applied prior to an NFA Approval Order's issuance. The deed, with the required restrictions, would become an attachment to the NFA Approval Order.

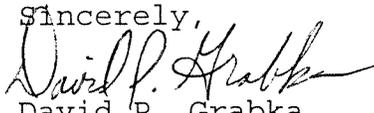
(2) The subsurface contaminated soil can be treated or excavated and properly disposed. This option could clean up the site where NFA without conditions could be approved.

(3) The low levels of TRPH detected may not all be from the C8-C10 aromatic hydrocarbon chain grouping. I have enclosed a copy of a memo (not finalized) concerning two methods that can be used to quantify petroleum fractions. The Total Petroleum Hydrocarbon Criteria Working Group Method is preferred as that method generates fractions directly comparable to the TRPH classes that SCTLs have been calculated for. I have enclosed a copy of Appendix C: Technical Basis for the TRPH Soil Cleanup Target Levels which identifies specific SCTLs for various aromatic and

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aliphatic hydrocarbon groups. This method may be used to determine that TRPH concentrations in the subsurface soil do not pose an unacceptable risk and that the site qualifies for NFA without conditions.

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: Wayne Hansel, Navy SouthDiv  
Lt. Gary Whipple, NTC Orlando  
Barbara Nwokike, Navy SouthDiv  
Nancy Rodriguez, USEPA Region 4  
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TJB



JJC



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