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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON INTERIM REMEDIAL
ACTION PERFORMANCE MONITORING AND SAMPLING PLAN AT OPERABLE UNIT 4 (OU
4) NTC ORLANDO FL
6/3/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

09.01.04.0014

00313

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

David B. Struhs
Secretary

June 3, 1999

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

RE: Operable Unit 4 (OU 4) - Interim Remedial Action (IRA)
Performance Monitoring and Sampling Plan (PM&SP), Quarterly
Reports #2 and #3, Naval Training Center Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the PM&SP Second and Third Quarterly Reports for the IRA at OU 4, NTC Orlando, dated March 15, 1999 and May 28, 1999 respectively, prepared and submitted by Harding Lawson Associates. I have the following comments concerning the two reports:

(1) In the second Quarterly Report covering the period from March 15, 1998 to August 31, 1998, it was specified that following an unanticipated shutdown of the IRA remediation system from mid-March to mid-May the drive points and monitoring wells scheduled to be sampled were revised. Significant changes in the drive points and monitoring wells sampled during the second and third quarter were noted. The PM&SP specified that during the initial phase of operations three drive points and eight monitoring wells were to be sampled and analyzed on a fixed schedule. The PM&SP also specified that in order to evaluate the in situ groundwater treatment system's effects on the surficial aquifer, groundwater samples would be collected from an array of six drive points, 14 monitoring wells and that surface water and sediment samples were to also be collected. Apparently, three drive points, the additional monitoring wells, and the sediment and surface water samples were to be collected after evidence demonstrating the effectiveness of the treatment system was noted. During the second and third quarter, only two drive points and two monitoring wells were sampled and analyzed. This represents a significant change from the PM&SP that needs to be discussed in detail, including the rationale for the reduction in monitoring wells and drive points to be sampled and why, where and when this decision was made.

(2) The Conceptual Design and Performance Specification for the IRA at OU 4 defined the effluent discharge criteria for PCE as 8 µg/l, TCE as 80 µg/l and total 1,2-DCE as 70 µg/l. The discharge criteria for PCE and TCE were based upon surface water quality standards and for total 1,2-DCE upon primary drinking water standards for cis-1,2-DCE. The effluent discharge criteria for PCE and total 1,2-DCE at UVB-1 was exceeded during two of five sampling events during the second quarter. The effluent discharge criteria for total 1,2-DCE at UVB-1 was exceeded during the only sampling event in the third quarter. The groundwater treatment system is not consistently meeting its performance specifications. Comparing effluent discharge concentrations of PCE, TCE and cis-1,2-DCE to their primary drinking water standards, there were exceedances in five of six effluent samples taken during the second and third quarter at UVB-1 and two of five samples taken during the second quarter at UVB-2. An effluent sample was not collected during the third quarter at UVB-2. If recent modifications done on the recirculation well treatment system at UVB-1 do not show consistent attainment of effluent discharge criteria in the fourth quarter report, the system will need to be shut down and the system redesigned or abandoned.

(3) Graphs would be helpful in Appendix B plotting head differential vs. time for the various observation well clusters.

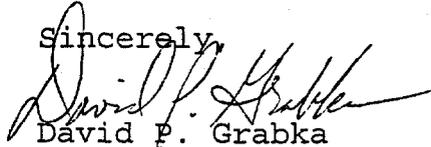
(4) While there have been reductions in contaminant concentrations in drive points DP-2 and DP-5, as of the September 29, 1998 sampling event, contaminant concentrations had not yet dropped to below surface water standards. Also, contaminant concentrations in monitoring wells OLD-13-09A and OLD-13-22B have not dropped below primary drinking water standards, although concentrations in OLD-13-09A have dropped to below surface water standards.

(5) The continual difficulties that have been encountered with the recirculation well treatment system, including the periods the system has been shut down for maintenance or modification, the exceedances of effluent discharge criteria, and failures in maintaining flow rates in the UVB wells; are creating doubts as to its long-term efficacy. Unless it can be shown that the system can be operated in accordance with its performance specifications for an extended period of time, this system would not be considered feasible as part of a long-term remedial action.

Mr. Wayne Hansel
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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
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
~~Steve McCoy~~, Brown & Root, Oak Ridge
Robin Manning, Bechtel, Oak Ridge
Bill Bostwick, FDEP Central District

TJB



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