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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON SITE ASSESSMENT
ADDENDUM BUILDING 129 NTC ORLANDO FL
6/17/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 17, 1999

Mr. Nick Ugolini
Code 1843 (UST RPM)
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report, Building 129, Main Base, Naval
Training Center, Orlando, FL

Dear Mr. Ugolini:

I have completed my review of the Site Assessment Report (SAR) for Building 129, Main Base, NTC Orlando, dated June 1, 1999 (received June 3, 1999), prepared and submitted by Harding Lawson Associates (HLA). I have the following comments that should be responded to in a SAR Addendum:

(1) I cannot reconcile the description of oil/water separator formerly located on site with the two oil/water separators described in the oil/water separator assessment report for Building 129 which received approval for No Further Action in 1997. The SAR has a former oil/water separator receiving spent antifreeze. The oil/water assessment report has two oil/water separators (grease traps) receiving fluids from maintenance activities conducted around an outside hydraulic lift and from floor drains located within vehicle maintenance bays of Building 129. It is likely that substances other than antifreeze were discharged to the oil/water separators. A diagram showing the location of the former oil/water separators and previous sampling locations would help in determining those areas that have previously been investigated and found not contaminated.

(2) The groundwater flow direction reported in the Building 129 oil/water assessment report has groundwater flowing from the southwest toward the northeast. The groundwater flow direction in the SAR shows groundwater flowing mainly from the southeast toward the west-northwest. It may be that there are seasonal fluctuations in groundwater flow direction or groundwater may be influenced by nearby irrigation wells.

(3) A diagram should be included in the SAR Addendum showing the location of the irrigation wells identified in Section 3.4 of the

SAR. Also, the depths at which these wells are screened should be specified if that information is available.

(4) The body of the report, including Table 4-3 on page 4-6, does not indicate that mercury was detected in groundwater at concentrations exceeding Florida primary drinking water standards. Groundwater analytical reports in the Appendices indicate mercury exceedances in MW-1 and MW-3. This needs to be corrected.

(5) Three parameters were noted in the water sampling logs located in the Appendices that may help to explain metals exceedances in groundwater in monitoring wells MW-1 and MW-3, and why metals were not detected in MW-2.

(a) Based upon the water sampling logs in the Appendices, groundwater was not purged in MW-1 and MW-3 using the quiescent sampling technique specified in Chapter 62-770, Florida Administrative Code. MW-2 appears to have been purged at a rate in conformance with quiescent sampling.

(b) It was noted that purged groundwater in monitoring wells MW-1 and MW-3 remained acidic throughout the purging. Purged groundwater in MW-2 became more neutral after approximately 3.5 well volumes had been purged.

(c) Turbidity in MW-1 and MW-3 was greater than 200 NTUs throughout the well purging. MW-2 had turbidities ranging between 84 and 168.5, ending with 141.3 NTUs.

(6) The footnotes to Table 4-3 on page 4-6 has "DL" denoting a sample that was diluted to quantify polynuclear aromatic hydrocarbons. As PAHs were not detected in any of the samples, I believed that DL actually should denote a duplicate sample.

(7) Bis(2-ethylhexyl)phthalate was detected at 15 µg/l in what is assumed to be the duplicate groundwater sample taken from monitoring well MW-1. This exceeds Florida primary drinking water standards. This well will need to be resampled and analyzed to confirm the contaminant's presence.

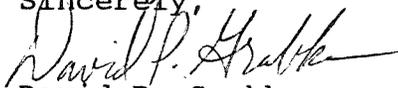
(8) Monitoring wells MW-1, MW-2 and MW-3 should be resampled and filtered and unfiltered groundwater analyzed for the eight RCRA metals, TDS and TSS. Purging of the monitoring wells should be performed with the quiescent sampling technique. Also, periodic measurements of pH, temperature, specific conductivity and turbidity should taken during purging. Prior to purging the wells, water level elevation measurements should be taken from existing monitoring wells and piezometers. If contaminant concentrations above groundwater cleanup target levels are confirmed by resampling the wells, the horizontal and vertical extent of groundwater contamination will need to be delineated.

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(9) As contaminants associated with petroleum (BTEX, PAHs and TRPH) were not detected during the initial site assessment, it may be that metals contamination in groundwater is from other site activities rather than from the used oil tank. Depending upon what is found from additional site assessment activities, it may be necessary to remove this site from the petroleum program and list it as an Installation Restoration Program site.

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
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge
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TJB

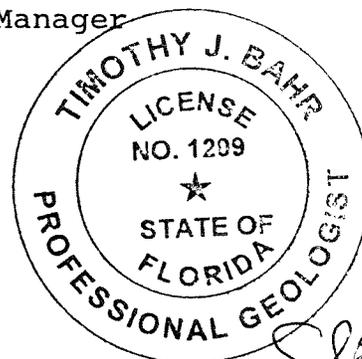
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