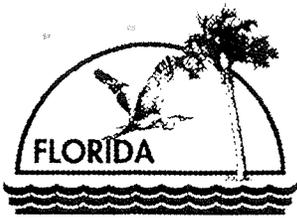


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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO THE PROPOSED PATH
FORWARD FOR HUMAN HEALTH RISK ASSESSMENT OPERABLE UNIT 2 (OU 2) MCCOY
ANNEX LANDFILL WITH ATTACHMENT NTC ORLANDO FL
2/4/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 4, 2000

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

RE: Proposed Path Forward for Human Health Risk Assessment,
Operable Unit 2 (OU-2), McCoy Annex, Naval Training Center,
Orlando, Florida

Dear Mr. Hansel:

The Department has completed its review of the document titled *Proposed Path Forward for Human Health Risk Assessment, OU-2, McCoy Annex, NTC Orlando*, received via e-mail January 10, 2000 from Tetra Tech NUS, Inc. I have attached comments from Stephen Roberts, Ph.D., University of Florida, that should be considered in the Human Health Risk Assessment portion of the Remedial Investigation Report for Operable Unit 2.

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: Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge
Steve Tsangaris, CH2M Hill, Tampa
Bill Bostwick, FDEP Central District

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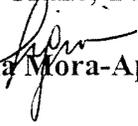
Florida Department of

Memorandum

Environmental Protection

TO: David Grabka, DOD Subsection, BWC

THROUGH: Jim Crane, Technical Review Section, BWC 

FROM: Ligia Mora-Applegate, Technical Review Section, BWC 

DATE: February 4, 2000

SUBJECT: Proposed Path Forward
Tetra Tech Responses on Human Health Risk Assessment
Ou2 McCoy Annex Landfill
NTC, Orlando, Orange County, Florida

I have reviewed the subject document and have read the comments submitted by Dr. Stephen M. Roberts (UF toxicologist on contract to FDEP). I concur with his comments and recommend that they be addressed. If the PRPs choose to do the justification for the FC term (of 0.1 versus 1.0) in the text, they will do so at the risk of it not been accepted if it is used to compensate for a poor estimate of the mean contaminant concentration at the site.



UNIVERSITY OF
FLORIDA

Center for Environmental & Human Toxicology

P.O. Box 110885
Gainesville, Florida 32611-0885
Tel.: (352) 392-4700, ext. 5500
Fax: (352) 392-4707

February 3, 2000

Ms. Ligia Mora-Applegate
Bureau of Waste Cleanup
Florida Department of Environmental Protection
Room 471 A, Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Ms. Mora-Applegate:

At your request, I have reviewed Tetra Tech's responses to our comments on the human health risk assessment for OU2 (McCoy annex landfill) at the Naval Training Center in Orlando, Florida. In conjunction, I also reviewed a document entitled *Proposed Path Forward for Human Health Risk Assessment, OU2, McCoy Annex, NTC Orlando*. I have previously provided comments to you on several documents pertaining to the human health risk assessment at OU2. Tetra Tech has for the most part adequately addressed and/or incorporated these comments into the human health risk assessment. However, there is still one outstanding item that requires further discussion.

I previously commented on the use of the FC term of 0.1 for carcinogenic PAHs at the McCoy Annex golf course. In my comment, I indicated that the FC value of 0.1 used by Tetra Tech was too low. In addition, I cautioned Tetra Tech that the use of the FC term must be carefully explained and justified. In response to this comment, Tetra Tech indicates that the FC of 0.1 will be retained and that additional justification will be provided in the text. At this point, I think that it is important to warn Tetra Tech that justification for an FC value less than 1 is not trivial, and is seldom done persuasively. This is particularly true when FC assumptions are used to compensate for what is, in reality, a poor estimate of the mean contaminant concentration on site. I encourage Tetra Tech to use instead a geostatistical approach to derive a better estimate of the site-wide mean concentration of PAHs in soil that could be contacted by site receptors.

I hope that you find these comments helpful. Should you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen M. Roberts".

Stephen M. Roberts, Ph.D.

cc: David Grabke