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LETTER REGARDING REGULATORY REVIEW AND COMMENT ON FINAL DRAFT SITE  
SCREENING REPORT FOR STUDY AREA 40 NTC ORLANDO FL  
2/16/2000  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush  
Governor

# Department of Environmental Protection

09.01.40.0002

00347

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

David B. Struhs  
Secretary

February 16, 2000

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

RE: Final Draft, Environmental Site Screening Report, Study Area  
40, Naval Training Center, Orlando, Florida

Dear Mr. Hansel:

I have completed my review of the Final Draft Environmental Site Screening Report for Study Area 40, dated November 1999 (received November 5, 1999), prepared and submitted by Harding Lawson Associates. I cannot concur that the property be reclassified to 4/Dark Green or that the property is suitable for transfer for its intended use at this time. I have the following comments on the report as well as subsequent discussions held concerning this site:

- (1) Based upon analyses of confirmatory samples taken at the edge of the soil excavation conducted by the Charleston Environmental Detachment, soils were left on site that exceed FDEP's Soil Cleanup Target Level (SCTL) for arsenic for residential use of the property. Confirmatory samples 40S023, 40S003, 99SPORT0172-11, 40S008, 40S009, 99SPORT0172-12, 99SPORT0172-14 and SA40S034 contained arsenic at concentrations of 1.6, 1.8, 2.12, 1.6, 1.1, 1.89, 1.7, and 1.5 mg/kg, respectively. This exceeds the reference concentration of 1.0 mg/kg for arsenic at the Main Base. Sample 40S001 exceeded the residential SCTL for dibenzo(a,h)anthracene.
- (2) The Interim Remedial Action Workplans, Fact Sheets and Final Decision Documents all specify that soils were to be removed that had concentrations greater than residential SCTLs for PAHs and the reference concentration for arsenic. My review comments to the Interim Remedial Action Workplan, dated April 20, 1999, also support this decision. Apparently, the work plan objectives were not attained.
- (3) Discussions have occurred at Orlando Partnering Team (OPT) meetings since the issuance of the Draft Environmental Site

Screening Report for Study Area 40. Options have been proposed by the Navy in order to avoid further investigative or remediation work on the site.

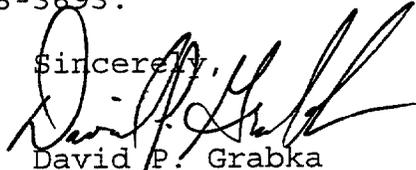
- (4) The first option proposed was calculating the 95% Upper Confidence Level on the mean concentration of arsenic at the site. This method was determined by FDEP as inappropriate for this site using the data collected during initial site screening and during confirmation sampling after excavation, because the calculation assumed a residential exposure over the entire eight to ten acres of the study area. This is contrary to draft guidance provided to the OPT which states that for the residential exposure scenario, exposure areas should not be greater than 0.5 acres.
- (5) The second option proposed was calculating a site specific SCTL based upon the OPTs understanding that the property was to be used for multi-family housing. A renter scenario was calculated by Tetra Tech NUS to be 3.0 mg/kg for arsenic based upon an 8 year exposure duration. This calculation was reviewed by FDEP contracted risk assessors and found to be incorrect. Their calculation has 2.1 mg/kg arsenic to be protective for the renter scenario. The use of this SCTL would be predicated upon restricting the area to having rental units only, and that rental agreements be no more than 8 years in duration. This option presupposes that the developer, Orlando Partners, will accept the property with those restrictions. FDEP's concurrence that the property is suitable for transfer would be conditional upon acceptable language being incorporated into the deed implementing those restrictions and the Navy's resolve in enforcing them.
- (6) The third option proposed by the Navy is to acknowledge that FDEP does not concur that the property is suitable for transfer, then transfer the property despite FDEP objections. This option essentially disregards FDEP's role in the partnering and BRAC process. As a non-National Priority List site, it is my understanding that the Navy is required to obtain state concurrence that the property is suitable for its intended use prior to property transfer.
- (7) I propose that further site investigation and remediation take place at Study Area 40 to remediate the site to the concentration levels as previously agreed to by the OPT in work plans, fact sheets and decision documents. The remedial goal would be to remediate soils with arsenic concentrations greater than 1.0 mg/kg and PAH concentrations greater than their respective residential SCTLs.
- (8) There appears to be an error on Figure 3-1 of the report. The chem box for sample 40S01001 is associated with sample

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location 40S00101. Sample location 40S01001 is located approximately 100 feet south of sample location 40S00101. The summary of analytical results in Appendix F lists sample 40S01001 as containing benzo(a)pyrene at a level exceeding its residential SCTL. However, sample location 40S00101 is shown as being excavated by the Charleston Environmental Detachment and sample location 40S01001 as having not been excavated. There is a question as to whether soil in the vicinity of 40S01001 contains PAHs that were inadvertently left out of the interim remedial action work conducted by the Charleston Environmental Detachment. This discrepancy needs to be resolved.

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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