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LETTER REGARDING REGULATORY REVIEW AND COMMENTS INTERIM REMEDIAL  
ACTION PERFORMANCE MONITORING AND SAMPLING AT OPERABLE UNIT 4 (OU 4)  
NTC ORLANDO FL  
3/7/2000  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Jeb Bush  
Governor

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

David B. Struhs  
Secretary

March 7, 2000

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  
Report #4, Naval Training Center, Orlando, Florida

Dear Mr. Hansel:

I have completed my review of the PM&SP Fourth Quarter Report for the IRA at OU 4, NTC Orlando, dated September 15, 1999 (received September 22, 1999), prepared and submitted by Harding Lawson Associates. I have the following comments concerning the report:

- (1) As was stated in my June 3, 1999 letter that reviewed quarterly reports #2 and #3, the performance monitoring being conducted at this site is much less than what was agreed upon in the Final Remedial Work Plan, Bechtel (1997). Two wells and two drive points in Lake Druid do not constitute an adequate number of points with which to evaluate the performance of this interim remedial action. While the fact that concentrations of VOCs in drive points DP-2 and DP-5 in Lake Druid have finally dropped below surface water standards after one year of operating the system is somewhat encouraging, the overall lack of data since the first quarter of operating the recirculation wells makes it impossible to fairly evaluate its success or failure.
- (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 rationale for the effluent criteria were the surface water standards for PCE and TCE and the primary groundwater standard for cis-1,2-DCE, as 1,2-DCE had no surface water standard at the time. The effluent from UVB-1 sampled on January 20, 1999 failed to meet this criteria for PCE and cis-1,2-DCE. As was stated in my June 3, 1999 letter, "if recent modifications on the recirculation well treatment

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PM&SP 4<sup>th</sup> Quarter Report  
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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." As design specifications apparently cannot be met with the system as constructed, the system should be shut down and either redesigned or abandoned, regardless that some limited improvement has been noted in drive points in Lake Druid.

If I can be of any further assistance with this matter, please contact me at (850)488-3935.

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

TJB



JJC



ESN

