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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT INTERIM  
RECORD OF DECISION AT OPERABLE UNIT 3 (OU 3) NTC ORLANDO FL  
6/13/2000  
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

June 13, 2000

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

RE: Draft, Interim Record of Decision, Operable Unit 3, Naval Training Center Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the Draft Interim Record of Decision, Operable Unit 3, Naval Training Center Orlando, dated April 2000 (received April 26, 2000). Overall, I found the report to be well written. The purpose of this Interim Record of Decision is to implement land and groundwater use restrictions, specifically authorize further monitoring of groundwater at the site, the installation of well points in Lake Baldwin and to propose further work to be conducting in evaluating alternative G-2 (Permeable Treatment Walls) as an effective technique for remediating the site. I do have the following comments that should be addressed in the Final Interim Record of Decision:

- (1) Page 1-3, Third Bullet on page. The prohibition on the issuance of permits for the installation of potable water wells, irrigation wells, or dewatering wells for construction projects screened within the surficial aquifer is not an attainable institutional control at this site. Rather, while the property remains with the Navy, the Navy will disallow the installation of the above-mentioned wells on their property. After the property has been transferred, groundwater use restrictions shall be enacted in the deed(s) through a Restrictive Covenant granting a perpetual conservation easement to the Department.
- (2) Page 1-3, Fifth Bullet on page. A five year site review is not required to be a part of this Interim Record of Decision. When a final decision is made on the selected remedy for this site, a five year site review will be a required component of the Record of Decision. Because of this, please also remove the first bullet on page 2-10.

- (3) Page 1-3, Groundwater Monitoring Section, Second Bullet. Groundwater also needs to be analyzed for iron, lead, antimony and manganese as those compounds have previously been detected above primary standards, secondary standards and base specific reference concentrations.
- (4) Page 1-3, Groundwater Monitoring Section, Fourth Bullet. It should be noted that contaminants in drive point wells and downgradient wells next to Lake Baldwin would need to be compared to surface water quality standards in order to evaluate whether some parameters could be discontinued.
- (5) Page 2-8, Second Paragraph, Last Sentence. The last sentence should say "are such parcels."
- (6) Page 2-8, Third Paragraph, Second Sentence. The sentence should end after future exposure to contaminated groundwater. This IROD does nothing to reduce further contamination migration through groundwater.
- (7) Page 2-8, Fourth Paragraph. This should be rewritten as "While further study of cleanup alternatives is undertaken, and in consideration . . ."
- (8) Page 2-8, Fourth Paragraph, Second Bullet. Are institutional controls to restrict land use to non-residential (recreational) to be applied over the entire site or only over portions of the site where contaminants remain at concentrations that exceed the residential SCTLs?
- (9) Page 2-8, Fourth Paragraph, Third Bullet. This sentence should be rewritten as "Monitoring of contaminated groundwater to track restoration and ensure the continued protection of human health and the environment as site use and conditions change with time."
- (10) Page 2-8, Fifth Paragraph, Second Sentence. Insert ROD before selected remedy.
- (11) Page 2-8, Sixth Paragraph, Second Sentence. Remove references to the maintenance of soil cover and unauthorized digging activities. The periodic inspections will help assure that no unauthorized residential development has occurred and that no wells have been installed within the area of groundwater restriction.
- (12) Page 2-9, Fourth Bullet. See comment (1).
- (13) Page 2-9, Fifth Bullet. Please insert "written" between annual and reminders.

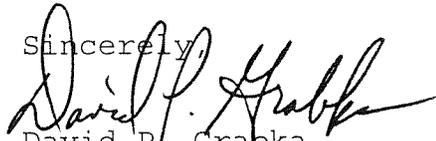
- (14) Page 2-14, Top of Page. It should say that "The Navy, FDEP and EPA will evaluate the data and will make a decision as to whether or not active remediation is necessary to prevent shallow groundwater beneath SA 8 from reaching Lake Baldwin."
- (15) Page 2-14, Third Paragraph. It should say Florida surface water quality standard instead of guidance concentration. In the same paragraph, it should state that "groundwater samples from intermediate wells at SA '9' each . . ."
- (16) The chem box data in Figures 2-5 and 2-6 for the January 2000 sampling event should be properly bolded to indicate exceedances.
- (17) It should be explicitly stated that the human health risk summary numbers explained in the text and listed in Tables 2-3 and 2-4 are for data collected from the Remedial Investigation. Since that time, Interim Removal Measures have reduced risk from surface soils to levels protective for potential future users such as recreational, trespasser, and commercial users. When a final remedy is selected and the Final Record of Decision is prepared, the risk numbers should be recalculated based upon current data, both soil and groundwater.
- (18) Page 2-33, Table 2-7. The list of selected contaminants of concern is not complete. Antimony, manganese, iron and several pesticides have been detected during the current groundwater monitoring effort and should be included on the table.
- (19) Page 2-33, Second Paragraph. It is stated that while pump and treat is a proven technique for removing contamination, experience has shown that attainment of drinking water standards may be technically impractical. What experience has shown this? This needs to be further clarified.
- (20) Page 2-33, Section 2.8.1.2, Second Paragraph, Bottom of page. It is stated that alternatives G-1 and G-2 may achieve action levels only after a sufficient period of time. "Sufficient" is too ambiguous a word. The estimated length of time predicted for those alternatives should be specified.
- (21) Page 2-38, Groundwater Monitoring, Second Bullet, First Bullet on page. See comment (3).
- (22) Page 2-44, Table 2-10, State Guidance Materials. Soil Cleanup Target Levels and Groundwater Cleanup Target Levels

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are now listed in Chapter 62-777, Florida Administrative Code.

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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