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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON SITE
SCREENING REPORT AT STUDY AREA 40 NTC ORLANDO FL
4/2/2002
U S EPA REGION IV

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01.01.40.0001

April 2, 2002

4WD-FFB

Ms. Barbara Nwokike
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
Charleston, SC 29419-9010

SUBJ: Draft Site Screening Report for Study Area 40, Naval Training Center, Orlando, Florida.

Dear Ms. Nwokike:

The United States Environmental Protection Agency (EPA) has completed its review of the subject document.

General Comments

1. The objective of the *Draft Site Screening Report* investigation "was to determine whether or not environmental media have been impacted from current or historical land uses," and ultimately reclassify the Study Area as "4/Dark Green" for future use. The report adequately details the delineation and removal of contaminated surface soil. However, one of the historical land uses of Study Area 40 was a landfill, identified as the "Bottle Landfill". Landfills typically also contribute contamination to both surface and subsurface soils. It does not appear that subsurface soil has been adequately characterized. Section 4.2 recommends classifying the area as "4/Dark Green" to signify all remedial action necessary have been undertaken, and the site has no restriction for future use. Only two subsurface soil samples were collected during the field investigations. One subsurface soil sample was collected from monitoring well OLD-40-01, which the text claims to be within the "Bottle Landfill". However, monitoring well boring logs did not reveal any waste material. No restrictions on future use would allow residential use of the Study Area. While residential use usually only considers soil 2 feet below ground surface, the site at its present state is undeveloped. Residential use of the site would require construction and excavation of the site for

residential housing. This construction and excavation could mix surface and subsurface soil and expose residents to subsurface soil. Section 4.2 also states the Study Area may still be underlain by landfill material and "if landfill materials are unearthed that may be hazardous in nature, the Navy should be notified so that they may, at their discretion, inspect the materials." The inspection and visual identification of waste does not adequately characterize any contamination that may be present in subsurface soil underlying the landfill material. At the least, the field investigations should have collected subsurface soil samples at the same locations of surface soil samples. Based upon the information provided in the *Draft Site Screening Report*, the recommendation that Study Area 40 be classified as "4/Dark Green" is not substantiated and should not occur at this time. If the Study Area is to remain as a recreational area, industrial area, or any future residential use of the site would not involve subsurface excavation, then the recommended classification of "4/Dark Green" would be satisfactory.

Specific Comments

1. **Page 2-5, Section 2.1.4., 2nd paragraph.** The text states that sample 40B00102, collected from monitoring OLD-40-01, was collected in the immediate vicinity of the "Bottle Landfill". However, this statement is not supported by the soil boring logs provided in Appendix A. The soil boring log does not reveal any waste material or evidence of landfill activities. Please provide justification for this statement and the proposed area of the "Bottle Landfill". In addition, all appropriate figures should delineate the proposed area of the "Bottle Landfill".
2. **Page 3- 5, Section 3.1.6 and Appendix E.** The Region III RBC screening values presented for non-carcinogens are not divided by 10 to account for additive effects. Please revise the text and the screening values presented in Appendix E. As a result, antimony also exceeds the Region III RBC for tap water.
3. **Page 4-1, Section 4.1.3.** This section states that groundwater is not a concern because it is unlikely that the antimony detected in one groundwater sample is indicative groundwater contamination. In addition, antimony was not detected in down-gradient wells. However, the text states that batteries disposed within the landfill cannot be discounted as a source of the antimony. As stated in General Comment #1, it does not appear that monitoring well OLD-40-01 was completed within the limits of the "Bottle Landfill". It could be possible that levels of antimony in

groundwater upgradient of monitoring well OLD-40-01 could be higher. Additional groundwater samples should be collected within the Study Area or additional justification given for discounting antimony in groundwater.

If you have any questions, please call me at (404) 562-8544.

Sincerely,

Gregory D. Fraley
Senior Remedial Project Manager

cc:

David Grabka, FDEP