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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON DRAFT AND
FINAL WORK PLANS FOR GROUNDWATER SAMPLING NTC ORLANDO FL
4/2/2002
U S EPA REGION IV

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April 2, 2002

4WD-FFB

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

SUBJ: Draft and Final Work Plan for Groundwater Sampling, Revision 4, Former Naval Training Center Orlando, Orlando, Florida, February 2002.

Dear Ms. Nwokike:

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

GENERAL COMMENTS

1. **There are subtle differences between some of the procedures listed in this Work Plan and the most current USEPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM)(November 2001). We would prefer that you follow the most current EPA procedures however, please include a statement in the Introduction chapter which states that the EISOPQAM is available for guidance as to details for procedures acceptable to USEPA, Region 4.**

SPECIFIC COMMENTS

1. **Page 4-1, Section 4.1. This section states that field test kits are sufficiently reliable for the measurement of Natural Attenuation parameters. Certainly, field tests have made considerable strides in reliability in the past years. However, there is no discussion of the precision and accuracy of the data generated. Please include a table of the possible test kits to be used and the expected precision and accuracy of the data to be generated. Only then could one be able to make informed decisions as to the appropriateness of the field test method to be employed.**
2. **Page R-1. Please revise the references section of this document to reflect the most**

recent version of the EISOPQAM, November 2001. Additionally, the guidelines for data validation of organic and inorganic compounds have been combined into one guidance document. Please revise the reference list to include the July 1999 Revision 2.1 version of the Functional Guidelines.

3. Pace C-1, Section 1.2. It is unclear if the Proposed Plan described in this section included land use controls for the groundwater media. If this is the case, please revise the document as appropriate.

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

Sincerely,

Gregory D. Fraley
Senior Remedial Project Manager

cc:

David Grabka, FDEP