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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT SITE
INVESTIGATION FOR STUDY AREA 36 NTC ORLANDO FL
1/2/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

January 2, 2003
OFFICIAL CORRESPONDENCE

Commanding Officer
attn: Mrs. Barbara Nwokike, Code ES333
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, SC 29419-9010

Dear Mrs. Nwokike:

I have completed my review of the Draft Site Investigation Report for Study Area 36, Main Base, Orlando Naval Training Center, dated September 16, 2002 (received September 18, 2002), prepared and submitted by Tetra Tech NUS, Inc. While the overall report is quite thorough, I have the following additions and comments that should be addressed in the final report:

- (1) On page 4-29, second paragraph, it incorrectly states that "Historically, benzene has not been detected in any other well at the site." It is correct to state that while benzene has been detected, it has been detected below its GCTL of 1 µg/L.
- (2) On page 4-29, bottom of the page, it says the TCE concentrations observed and reported in Appendix D indicate that the lateral extent of the plume has decreased since December 2001. Appendix D does not contain any data from sampling events since the October 2001 sampling event. Furthermore, data from sampling events since October 2001, especially from the replacement wells installed by Nodarse & Associates, could not be found in the report.
- (3) On page 4-30, last paragraph, it briefly discusses some of the data from the replacement wells. I could not find the mention of the previous discussion concerning the presence of benzene and MTBE in upgradient well 23CR which is said to be in Section 4.3.1. Also, some other chemicals of concern are mentioned, 1,2-dibromo-3-chloropropane and 1,1,2,2-tetrachloroethane are mentioned as having been detected, but it does not mention in which well(s), at what concentrations they were detected, or whether the contaminants were detected at concentrations exceeding their GCTLs.
- (4) Please provide a figure showing the replacement wells installed by Nodarse & Associates in relation to the previously installed monitoring wells.
- (5) Please provide a figure with chem.-boxes showing the concentrations detected in the replacement wells installed by Nodarse & Associates.
- (6) The detection of benzene in 37C, benzene and MTBE in well 23CR and PCE in 23C, all deep wells upgradient of the TCE contaminant plume and outside of the Study Area 36 site boundary, strongly suggests that there may be an undiscovered upgradient source for these contaminants. These detections warrant further site assessment in order to determine the origin of these contaminants and their horizontal and vertical extent. I suggest that this investigation be associated with a separate site which should be given its own unique site name and identifier.

Please make the changes mentioned above in the final report.

This electronic message is being sent in lieu of regular mail. If you have any questions concerning this review, please contact me at (850)245-8997.

Sincerely,

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