

N65928.AR.001357
NTC ORLANDO
5090.3a

LETTER REGARDING REGULATOR COMMENTS ON DRAFT FEASIBILITY STUDY DRAFT
PROPOSED PLAN AND DRAFT RECORD OF DECISION FOR OPERABLE UNIT 2 (OU 2)
NTC ORLANDO FL
3/7/2003
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

61 Forsyth Street
Atlanta, Georgia 30303-3104

March 7, 2003

4WD-FFB

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

SUBJ: Draft Feasibility Study, Proposed Plan and Record Of Decision for Operable Unit 2,
Orlando Naval Training Center, Orlando, Florida

Dear Ms. Nwokike:

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

These documents are well produced and presents a reasonable case for the alternatives presented.

The approval of the drafts of the Proposed Plan and the Record of Decision are, of course, inextricably linked to the acceptance of the Draft Feasibility Study. Consequently, the comments offered below apply specifically to the Draft Feasibility Study and affect the other two documents proportionately. Also, any remedy that includes any type of institutional control (i.e. land use control) as part of the solution cannot be approved at this time.

Comments

The presence of mercury in all media causes some concern. Mercury was detected in the ponds on site, in the groundwater and in the sediment and surface water of the adjacent canals. The ecological habitat was dismissed as being of low quality and the majority of the mercury detections were below the screening criteria. However, mercury does not attenuate naturally and would be expected to be detected at lower concentrations only through dilution. It is requested that mercury be monitored in both the surface water and sediment of the adjacent canals so as to detect any further migration towards off-site areas.

In Table 6-2, there is some confusion regarding the language for environmental protection for Alternative S-2. The table says that natural attenuation might prevent migration

of groundwater. As the suggested remedy for the southern plume, this language not provide sufficient assurance that the environment will be protected. Other than controlling access to the groundwater under the site, this alternative does no more to remediate the groundwater than the No Action alternative. This feasibility study needs to more firmly demonstrate that Alternative S-2 will protect the environment, specifically, off-site groundwater and surface water, before EPA can agree to the selection of this alternative.

Upon review of the items in this row, there are uncertainties that are unacceptable to EPA. Alternative S-3 is claimed to prevent the migration of groundwater when perhaps it meant to say that it would prevent the migration of contaminated groundwater. Additionally, the three other alternatives all infer a lack of source control in stating that the landfill might continue to release contaminants. None of this language provides a level of certainty which will allow EPA to select one of the alternatives, as currently presented.

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

Sincerely,



Gregory D. Fraley
Senior RPM

cc:

David Grabka, FDEP