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TRANSMITTAL LETTER REGARDING FINAL RECORD OF DECISION OPERABLE UNIT 1
(OU1) WITH RESPONSE TO REGULATOR COMMENTS NTC ORLANDO FL
7/30/1997
ABB ENVIRONMENTAL SERVICES, INC



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July 30, 1997

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Commanding Officer
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Naval Facilities Engineering Command
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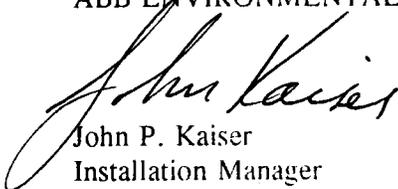
Subject: Operable Unit 1, (OU1)
Final Record of Decision
NTC, Orlando, Orlando, Florida
Contract; N62467-89-D-0317/CTO 107

Dear Barbara:

Enclosed is the Final Record of Decision (ROD) for OU 1 for your usage. The ROD documents the remedial actions chosen to address contamination at OU 1, and includes the responsiveness summary, which is the response to comments received from the community during the public meeting and comment period. This document also contains all required changes based on USEPA and Florida DEP comments (see attached).

If you have any questions or comments, please do not hesitate to call me at (407) 895-8845 or Shannon Gleason at (703) 769-8181.

Very Truly Yours,
ABB ENVIRONMENTAL SERVICES, INC.



John P. Kaiser
Installation Manager

JK/cp

cc: W. Hansel (SDIV)
G. Whipple (NTC, Orlando)
J. Mitchell (FDEP)
N. Rodriguez (EPA)
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RESPONSE TO COMMENTS
Draft Record of Decision
Operable Unit 1
Naval Training Center, Orlando

U.S. Environmental Protection Agency (USEPA) Comments
Nancy Rodriguez

GENERAL COMMENT

The ROD is inappropriately labeled as a no action ROD. In fact, groundwater monitoring and institutional controls which restrict residential use, restrict intrusive activities, landfill cover inspections, and prohibit groundwater consumption, are considered "actions" under EPA's "Guidance on Preparing Superfund Documents."

The Record of Decision (ROD) for Operable Unit (OU) 1 was completed in accordance with EPA guidance on preparing RODs. The guidance used in preparing the ROD are listed in the reference section.

The ROD for OU 1 is not considered a "no action" ROD; as such, the first sentence of the second paragraph in Section 1.2 has been restated as follows: "The purpose of remedial action at OU 1 is to monitor contamination at the site via a groundwater monitoring program and site inspections, and evaluate whether or not additional remedial actions are necessary."

SPECIFIC COMMENTS

1. **Pg. 1-1, Section 1.2, The word methods should be replaced on each appearance in these two paragraphs, with the works action/actions, as is appropriate. Concomitantly, "(t)his decision is based on the administrative record for this site" is missing.**

The phrase "remedial method(s)" has been replaced with "remedial action(s)" throughout the document.

The sentence "The remedial actions were chosen based on the administrative record for the site." was added to Section 1.2 of the ROD.

2. **Pg. 1-1, Section 1.3, See comments in perfunctory paragraph of these comments. The description of the selected remedy is not in concert with a "NO-ACTION ROD."**

Refer to response to general comment.

3. **Pg. 1-2, Section 1.4, The declaration statement is similarly incompatible with a "NO-ACTION ROD."**

Refer to response to general comment.

4. **Pg. 1-1, next to last ".", Please include gamma under radionuclide parameters. A gamma "spec" is needed to not only help identify any progeny from radium or uranium, but also other potential contaminants that aren't medical short-lived isotopes.**

Also, the gross alpha and beta measurements are intended for screening. Any measurements resulting in levels greater than 15 Pci/L for gross alpha, and 50 Pci/L for gross beta, should be required for isotopic analysis, just like referenced in 40 CFR 141.

A gamma spec will not be included in the groundwater monitoring for OU 1. However, total dissolved solids analysis will be added. Further discussion of this comment will occur at a conference call scheduled for Friday, July 11, 1997.

5. **Pg. 2-1, Section 2.3 and Section 2.9.3, Update current information on the Proposed Plan and Public Meeting.**

Sections 2.3 and 2.9.3, in addition to Appendix A, have been updated to reflect the dates of the public comment period and public meeting.

6. **Pg. 2-9, Section 2.6.6, second sentence, "Several soil ga samples..." ... typo error.**

Comment was addressed as indicated.

7. **Pg. 2-10, fourth paragraph, It says "It is theorized that the mobilization of the radionuclides.." This should be changed to "It is theorized that the mobilization of the naturally occurring radionuclides..."**

Comment addressed as indicated.

8. **Pg. 2-10, Section 2.6.8, Agree with the assessment of the reasons for some elevated gross alpha and beta measurements, but should emphasize that these gross measurements should only be used for screening purposes, and the individual radionuclides should be analyzed for to determine if MCLs were exceeded or contamination is present above background.**

Comment noted; no changes were made to the text of the ROD. Further discussion of this comment will occur at a conference call scheduled for Friday, July 11, 1997.

9. **Pg. 2-19, Section 2.8.1, Change "appreciable changes" to "exceedances."**

Comment addressed as indicated.

RESPONSE TO COMMENTS
Draft Record of Decision
Operable Unit 1
Naval Training Center, Orlando

Florida Department of Environmental Protection (FDEP) Comments
John Mitchell

1. **Section 1.0 (Introduction) should not be a section, but should be the "Declaration of the Record of Decision."**

Section 1.0 will be retitled, "Declaration of the Record of Decision" in accordance with the USEPA Guidance Document entitled *A Guide to Developing Superfund Records of Decision* (USEPA, 1990).

2. **In the second paragraph of the Statement of Bases and the Purpose of the Declaration on page 1-1, change "restrict the residential use of the land" to "restrict the land to industrial or recreational use (non-residential)."**

The text of the referenced sections was changed to clarify the intent of the proposed institutional controls.

3. **On page 1-2 of the Declaration, under the subsection Institutional Controls, change the third bullet to read "restrict use of the area of the landfill to industry and recreation only."**

Also, on this page, the signatory of the Declaration should only be the Navy representative.

The text of the referenced sections was changed to clarify the intent of the proposed institutional controls. Also, the signatory of the Declaration was changed to reflect the Navy representative's signature, only.

4. **In the last paragraph of Section 2.7.1 (HHRA) on page 2-13, change the work "prohibit" to "restrict."**

Comment addressed as indicated.

5. **In Section 2.8.1 (Groundwater Monitoring) on page 2-18, decisions points related to the sampling frequency need to be better defined other than using the term "appreciable changes" or "appreciable increases." Any changes related to the monitoring and sampling program should be determined based on specific increases or decreases of the contaminant(s) of concern (e.g., gross alpha; gross beta) which exceed drinking water standards and background.**

The phrase "appreciable changes" or "appreciable increases" was changed to "exceedances" as per USEPA comment #9.

6. **In Section 2.8.3 (Institutional Controls) on page 2-21, I recommend the following:**

- a) **In the second sentence of the second paragraph, it should indicate that these chemicals are likely mobilized from the native soils rather than coming from the landfill.**

Comment addressed as indicated.

- b) **In the second bullet, change the work "prohibited" to "restricted."**

The referenced phrase was changed to clarify the intent of the proposed institutional control.

- c) **In the third bullet, delete the phrase "however, the levels at OU 1 are within the range of detected levels in uncontaminated aquifers...etc...(to end of sentence)." Also, change the next to last sentence to read: "Because of these concentrations, the surficial groundwater above the Hawthorn formation and within approximately 600 feet of the landfill boundary should not be used for consumption or irrigation."**

Comment addressed as indicated.

- d) **In the fourth bullet, change "may contain" to "contains." Also, incorporate the last sentence of this section into the fourth bullet. It should read: "Due to these concerns, the area within the landfill boundary will be restricted to industrial or recreational use."**

Comment addressed as indicated. Also, the text of the referenced bullet item was changed to clarify the intent of the proposed institutional control.

- e) **The last sentence of this section should read: "The property transfer documents and recorded deed will include the above restricted covenants."**

This statement was incorporated into the last sentence of the paragraph introducing the referenced bullet items.