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NTC ORLANDO
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LETTER AND RESPONSE TO U S EPA COMMENTS TO INTERIM REMEDIAL ACTION
FOCUSED FIELD INVESTIGATION WORKPLAN OPERABLE UNIT 4 (OU4) NTC ORLANDO
FL
5/30/1996
ABB ENVIRONMENTAL SERVICES, INC

ABB



May 30, 1996

Document No.: 08519.425

Commanding Officer
Southern Division
Naval Facilities Engineering Command
Attn: Wayne Hansel, Code 18B7
2155 Eagle Drive
N. Charleston, SC 29406

FILE COPY

Subject: Operable Unit 4, Interim Remedial Action,
Focused Field Investigation Workplan;
Response to EPA Comments.
CTO 107, Contract No.: N62467-89-D-0317

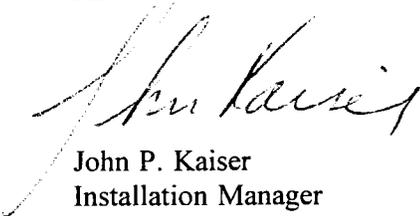
Dear Mr. Hansel:

Enclosed please find a copy of our response to EPA's comments dated May 6, 1996. All comments had been addressed in the Final Workplan which was issued April 30, 1996. The second comment will also be addressed during the OU4 RI/FS.

Should you have any questions or need further information please call me at (407) 895-8845.

Very truly yours,

ABB ENVIRONMENTAL SERVICES, INC.



John P. Kaiser
Installation Manager

JPK:lb
Attachment

cc: Barbara Nwokike (EIC)
LCDR Catherine Ballinger (NTC)
Nancy Rodriguez (USEPA)
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PROJECT REVIEW COMMENTS

OPERABLE UNIT 4, INTERIM REMEDIAL ACTION FOCUSED FIELD INVESTIGATION WORK PLAN NTC, ORLANDO

Comments from the U.S. Department of Environmental Protection
Nancy Rodriguez

1. **Section 1.2.3, p. 1-5. The investigators must be made aware that PCE breaks down into TCE, 1,2-DCE, and vinyl chloride (in that order). Some 1,1-DCE is also produced. 1,1,2-TCA and 1,2-DCA and CA are not produced in this process, and, if present, almost certainly come from a different source. Not taking this into account (two or more source areas) for the proposed sampling strategy will lead to flawed results.**

ABB-ES has considerable experience working with chlorinated solvent contamination, including EPA SITE Program projects to demonstrate in-situ bioremediation. References to TCA and DCA were in error, and the workplan has been revised. The only chlorinated compounds detected to date at OU 4 have been PCE, TCE, 1,2-DCE, some 1,1-DCE, and vinyl chloride. No saturated chlorinated compounds have been detected. At this time, there is no evidence to suggest a source other than the former dry cleaner, although releases have likely occurred at more than one location.

2. **Section 2.0, p. 2-1. The floor drains should be checked with dye to ensure a positive connection to the sanitary system exists.**

The workplan has been revised to better describe the floor drainage system. The drains are actually open trenches that can be traced visually to the discharge point. The focused field investigation is intended to concentrate on the area in the vicinity of Lake Druid rather than the laundry. A dye test may still be useful, but this will not be determined until the full remedial investigation is conducted at OU 4.

3. **Figure 2-1. VOC concentrations are not shown on Figure 2-1, as stated in the text.**

The reference to Figure 2-1 has been removed from the document. The text now directs the reader to Figure 1-1 of Attachment A (the Preliminary Risk Evaluation) for a summary of VOC concentrations.

4. **Section 3.2.2.1, p. 3-6. The delineation of the plume should be better defined. I recommend using the clean-up criteria for the various contaminants in conjunction with the capabilities of the mobile laboratory and derive a list of workable values that define the extent of contamination.**

The mobile laboratory should be capable of detecting contaminant concentrations as low as MCLs and Florida surface water standards. These values are being used as a starting point to define the extent of contamination. Actual sample locations and the extent of any necessary plume chasing will evolve as field data is collected. For this phase of the investigation, the plume will be considered delineated when the data is deemed sufficient to prepare a conceptual model of the interaction between groundwater and the lake with a confidence level high enough to propose remedial technologies.

PROJECT REVIEW COMMENTS

(Continued)

**OPERABLE UNIT 4, INTERIM REMEDIAL ACTION
FOCUSED FIELD INVESTIGATION WORK PLAN
NTC, ORLANDO**

Comments from the U.S. Department of Environmental Protection
Nancy Rodriguez

5. **Figure 1-2 and Attachment A, Figure 1-1. Examination of these two figures lends strong credence to the theory that significant discharge occurred/is occurring via the storm drain. Figure 1-2 shows the creek (or inlet) very nearly lined up with the culvert beneath Port Hueneme Avenue. Figure 1-1 of Attachment A shows that some of the highest reported contaminant values are found in this creek or inlet. This should be a focus of the investigation.**

Agreed. The investigation will begin in the area of the creek or inlet. Subsequent sampling locations will move away from the creek to the extent necessary to adequately delineate groundwater and lake contamination.