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LETTER REGARDING INTERIM REMOVAL ACTION FOR STUDY AREA 52 NTC ORLANDO
FL
5/14/1997
ABB ENVIRONMENTAL SERVICES, INC

May 14, 1997

ABB



8545.328

Environmental Detachment Charleston
1899 North Hobson Avenue
North Charleston, SC 29405-2106

ATTN: Ms. Terry Lewis

SUBJECT: Interim Removal Action for Study Area (SA) 52
Naval Training Center (NTC), Orlando, Florida
Contract No. N62467-89-D-0317/107

Dear Terry:

This letter summarizes your conversation this morning with Marc Hawes, Shannon Gleason and Jennifer Curtin concerning the management of contaminated soils at Study Area 52 (SA52) and Operable Unit 3 (OU3).

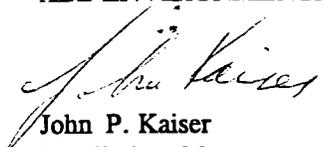
The Resource Conservation and Recovery Act (RCRA) guidance material states that if the source of the contamination cannot be determined from facility records/interviews, then the lead agency, not the generator, must make the final determination about whether a waste listing applies. Although the soil to be removed at OU 3 is a listed hazardous waste because we have historical information that provides evidence of storage and disposal practices at this site, we do not possess similar information for SA52. At this time, we only have information that Building 7261 was a former entomology laboratory. Our search for records to indicate when the building was demolished and the site practices of the laboratory has been unsuccessful to date. Therefore, because of the lack of historical information, ABB-ES does not support the conclusion that the soil is a listed waste.

If a waste is not a listed waste under RCRA, then a waste characterization is performed to determine whether the waste contains hazardous characteristics, using the Toxicity Characteristic Leaching Procedure (TCLP). If the leaching analysis for this waste is below regulatory requirements, the waste is classified as not hazardous. Sample 52S04401 was submitted for TCLP pesticide analysis in December, 1996; the analytical results did not indicate that the sample was a RCRA characteristic waste.

Because the decision of whether or not to classify this waste as hazardous will effect the disposal costs, ABB-ES would recommend that this information be sent to the lead agency and that they be asked to make the listing determination. It is our intent to discuss these results at the next scheduled OPT meeting. If you have any questions or comments regarding this matter, please call Shannon Gleason at (703) 769-8145 or Marc at (407) 895 - 8845.

Very Truly Yours,

ABB ENVIRONMENTAL SERVICES, INC.


John P. Kaiser
Installation Manager


Marc Hawes
Engineer

JPK/MH

cc: W. Hansel (SDIV)
N. Rodriguez (USEPA)
J. Mitchell (FDEP)

Lt. G. Whipple (NTC, ORL)
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