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NTC ORLANDO
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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO THE FINAL OPERABLE
UNIT 2 (OU 2) REMEDIAL INVESTIGATION WORK PLAN NTC ORLANDO FL
3/4/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

09.01.02.0001

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Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 4, 1997

Mr. Wayne Hansel
Code 18B7
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Final Operable Unit 2 Remedial Investigation Work Plan, NTC
Orlando.

Dear Mr. Hansel:

I have completed the technical review of the above referenced document dated January 1997 (received January 23, 1997). The document cannot be approved as final until the following comments are addressed.

1. Under Section 1.1 (Regulatory Background), the last sentence of the second paragraph should indicate compliance with any state statutes or regulations. It should also state that the regulatory compliance is for the protection of human health and the environment; not just protection of natural and cultural resources.

Also under this section an additional bullet indicating the stage for the Proposed Plan and Record of Decision (ROD) should be inserted between the bullets for RI/FS and RD/RA.

2. Table 2-1 (Summary of Results of Groundwater Analysis) should include the dates of the sampling and analysis.
3. Under Section 2.6 (Approach Overview) on Page 2-12, the last sentence of the next to last full paragraph indicates doing a qualitative ecological risk evaluation. The document should state that an Ecological Risk Assessment will be performed. An ERA is required under CERCLA Guidance. The ERA may be qualitative or quantitative depending on the analytical results.
4. In Table 2-4 (Conceptual Site Model) lines/arrows are designated as either probable (large and bold) or potential (small) conditions. The following lines should be changed:
 - a. Dermal Contact/Incidental Ingestion of Landfill Material and Subsurface Soil is a probable condition for a Site

Maintenance Worker and a potential condition for a Recreational User.

- b. Dermal Contact/Incidental Ingestion of Surface Soil is a probable condition for Ecological biota.
 - c. Inhalation of air is probable for the Recreational User.
5. Under Section 2.7.1 (Conceptual Site Model) on page 2-15 for the four probable release mechanisms: item No. 1 should include the site maintenance worker as there are exposed materials in some areas and divers work in the golf course ponds; item No. 4 should also include recreational users.
- Also, on page 2-16 for the six potential release mechanisms, Item No. 4 (Gases released from landfill wastes) can be deleted as the recreation exposure is probable, as it is for the site maintenance worker, rather than potential.
6. Under Section 2.7.2.2.1 (Potential Receptors), the location of three irrigation wells mentioned in the second paragraph should be indicated in the text or on a figure. Also in this section, on page 2-18, the second bullet should be current and future recreational user; the third bullet should be current and future off-landfill resident; and the fourth bullet should also include fish and fish eating birds as ecological receptors.
 7. Under Section 2.7.2.2.2 (Potential Exposure Pathways) on page 2-18, inhalation needs to be included as an exposure pathway. On page 2-19, for the probable site condition exposure pathways, the first bullet should include the site maintenance worker, and the second bullet should include the recreational user. Also on page 2-19, for the potential exposure pathways, delete the first bullet as this is a probable pathway, and replace it with "dermal contact with or ingestion of landfill materials by a recreational user."
 8. Under Section 2.7.3.2 (Preliminary Remedial Action Objectives,) on page 2-29 the first sentence needs to be changed to reflect previous comments concerning probable exposure pathways.
 9. Section 2.7.3.3.1 (Institutional Controls) should state that institutional controls may also include restricted use of the groundwater.
 10. Under Section 2.8 (Summary of Data Needs), on page 2-24 the bullet for Soil indicates random sampling. However, soil samples are to be one per acre. On page 2-38, the bullet for Biota should state the information will support an ERA not just a qualitative evaluation. Qualitative or

quantitative will be determined by the data collected. Also, on page 2-38, the last paragraph indicates assessing background. NTC Orlando already has a background document for the McCoy Annex and Main Base and should be the reference source.

11. In Table 2-3 (Technology Performance Uncertainties) for Institutional Controls it states a potential deviation would be FDEP reclassifying the surface water body. This is not a likely or viable solution and should be removed from the table.
12. Under Section 3.1 (Geophysical Survey Program) on page 3-1 the second bullet concerning "hot spots" may also include trenching for more detailed analysis of the landfill. This should also be reflected in the last paragraph of this section on page 3-3.
13. Under Section 3.2 (Soil Gas Program), what is the specific passive gas technique to be employed? At Tyndall AFB, we have had success using GORE Sorbers. Also, the section should note that the soil gas survey can also be of benefit for monitoring well placement or DPT screening in downgradient locations.
14. Section 3.3.1 (Direct-Push Technology Sampling Program) and Section 3.3.2 (Cone Penetrometer Testing Program) only mention analyzing with a mobile field laboratory. This section should indicate that 10% - 20% of the samples will be verified through an approved off-site laboratory.
15. Under Section 3.4.2 (Surface Water and Sediment Sampling), on page 3-13, surface water and sediment samples should also be included in the golf course ponds; not just drainage ditches and downgradient areas.
16. Under Section 4.2 (Data Evaluation) on page 4-2 COCs should be COPCs (Chemicals of Potential Concern). In addition to comparison to background, frequency of detection, and extent of contamination for identifying COPCs, this section should also include comparison to groundwater MCLs, Florida Soil Cleanup Goals (SCGs), USEPA Region III RBCs; Florida Surface Water Quality Standards, Federal Ambient Water Quality Criteria, Florida Sediment Quality Assessment Guidelines (SQAGs), and Region IV Sediment Screening Values. Also, the last paragraph of this section should indicate that background comparison is for inorganic constituents only.
17. Section 5.1.1 (Hazard Identification) should also use To Be Considered (TBC) guidelines.

Mr. Wayne Hansel
March 4, 1997
Final RI Work Plan OU 2
Page 4

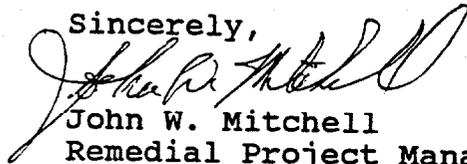
18. Under Section 5.1.3 (Exposure Assessment) on page 5-3, the second bullet should include recreational users.
19. Section 5.2 (Ecological Evaluation) should be titled Ecological Risk Assessment. This should also be reflected in the text of this section.
20. Under Section 5.2.1 (Problem Formulation), the first paragraph should include the information mentioned in Comment No. 16.
21. Section 7.0 (Remedial Investigation Report) should state that the final RI Report will be signed and sealed by a Florida Registered Professional Geologist with responsible charge for its preparation.
22. Appendix A (Synopsis of Potential Federal and State ARARs), on page A-7, indicates that the Florida SQAGs are cleanup goals. They are not cleanup goals, but are for screening purposes based on a weight of evidence for levels which may pose a threat to biota.

Although this was never a permitted landfill, Appendix A should also include as a TBC the Chapter 62-701, F.A.C., Solid Waste Management Facilities. In relation to any remedial action or potential monitoring at this site, we should attempt to meet the intent of the rule.

23. Prior to approval, this RI Work Plan must be signed and sealed by a Florida Registered Professional Geologist with responsible charge for its preparation.

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



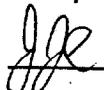
John W. Mitchell
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando
Barbara Nwokike, Navy SouthDiv
Oscar "Mac" McNeil, Bechtel
Nancy Rodriguez, USEPA Region 4
Bill Bostwick, FDEP Central District
John Kaiser, ABB, Orlando
Steve McCoy, Brown and Root, Oak Ridge
Patricia Kingcade, OGC/Trustee File

TJB



JJC



ESN

