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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON LANDFARMING OF  
BUILDING 7174 NTC ORLANDO FL  
6/30/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

00820

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

June 30, 1997

Mr. Nick Ugolini  
Code 184 (PVC)  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Landfarm, Building 7174, McCoy Annex, NTC Orlando  
FDEP #488840202

Dear Mr. Ugolini:

I have recently learned information that landfarming of excessively contaminated soils from Building 7174 is occurring. I was informed that:

- approximately 1900 cubic yards of petroleum contaminated soil has been excavated and placed into two landfarm cells;
- soils in each cell are 20 inches deep which exceeds the 6 to 12-inch limit specified in the Department's guidance;
- one of the cells does not have a berm/hay bale retainer on one side potentially allowing contaminated leachate or runoff to drain from the cell in an uncontrolled manner; and
- the cells are not being covered prior to and after tilling.

If these facts are true, then this operation is out of compliance with Chapter 62-770, F.A.C. Based on the above information, I request you to immediately:

- correct any variations in the operations of the landfarms that are not conforming to the Department's guidance;
- assure that the operation is secure from any potential migration of contamination to other soils, surface water, or groundwater. Possible ways of assuring this are, but not limited to: surrounding the perimeter of the cells with a berm to eliminate run-off and placing an impermeable liner under and cover over each cell; and
- Landfarming "is generally appropriate for limited quantities of soil." An Alternative Procedure is required for excavation and treatment of excessively contaminated soil quantities greater than 1500 cubic yards as IRAs. The Navy should have obtained an Alternative Procedure prior to excavating soil at Building 7174 as an IRA and is therefore technically out of compliance with Chapter 62-770, F.A.C. The Orlando Partnering

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Team must discuss at the next opportunity how we can avoid future occurrences similar to this incident.

I am requesting the Navy to take these actions to protect the Navy from being potentially liable for contaminating clean soil, surface water, and groundwater at the landfarm, or continuing to be out-of-compliance. We will discuss this further at the Orlando Partnering Team Meeting on July 16, 1997.

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: Wayne Hansel, Navy SouthDiv  
John Kaiser, ABB Orlando  
Bob Cohose, Bechtel  
Nancy Rodriguez, USEPA Region IV  
Gary Whipple, NTC Orlando  
Steve McCoy, Brown and Root, Oak Ridge  
Bill Bostwick, FDEP Central District

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