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LETTER REGARDING REGULATOR RESPONSE TO COMMENTS FOR THE DRAFT
RECORD OF DECISION FOR OPERABLE UNIT 1 (OU 1) NTC ORLANDO FL
11/30/1997
ABB ENVIRONMENTAL

ABB

05.01.01.0003

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November 12, 1997

Commanding Officer
Southern Division
Naval Facilities Engineering Command
ATTN: Ms. Barbara Nwokike, Code 187300
P.O. Box 190010
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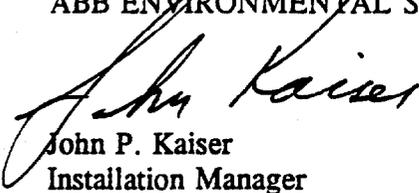
Subject: Operable Unit 1, (OU1)
Final Record of Decision (Revised)
NTC, Orlando, Orlando, Florida
Contract; N62467-89-D-0317/CTO 107

Dear Barbara:

Enclosed is the Revised 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 revision was necessary since it incorporates recent comments by the USEPA that were received in October. These comments and associated responses are attached. We ask that you append this to your copy of the original "Response to Comments" dated July 30, 1997.

If you have any questions or comments regarding this deliverable, please do not hesitate to call me at (407) 895-8845.

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)
B. Cohose (Bechtel)
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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

The following comments were received from the USEPA in October 1997 and document changes required prior to the issuance of a concurrence letter.

1. Pg. 1-1, Section 1.2, The word "Pollution" is missing from the second sentence of this paragraph, between the words Substances and Contingency.

Further, this section should include language which states that "Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Record of Decision (ROD), may present an imminent and substantial endangerment to public health, welfare, or the environment."

Please delete the following phrase from this paragraph: "the Navy's Installation Restoration (IR) Program, which mirrors guidance provided under."

Section 1.2 was revised in accordance with the above comments.

2. Pg. 1-1, Section 1.3, This section does not describe the role of the remedy selected for this operable unit, in the overall site strategy.

Section 1.3 was not revised. In discussions with the USEPA and the Navy it was determined that section 1.3, entitled "Description of the Selected Remedy," contains wording that demonstrates how the various remedial actions will satisfy the final remedy for OU1 (the site). The last sentence of that section also states the role of the remedy which is to..." control current and future risks associated with contaminants present at OU1." Additionally, section 2.4 entitled, "Scope and Role of Remedial Actions Selected for OU1," describes in more detail how the remedy fits into the overall site strategy.

3. Pg. 1-2, Section 1.4, The ROD is missing the statutory language needed for a section which should be labeled "STATUTORY DETERMINATIONS" and contain the following:

The selected remedy is protective of human health and the environment, complies with Federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. However, because treatment of the groundwater was not found to be practicable, this remedy does not satisfy the statutory preference for treatment as a principle element.

Because this remedy will result in hazardous substances remaining on-site above health-based levels, a review will be conducted within five years after commencement of the remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

Section 1.4 was revised to include the wording described above. The title of that section however, was not changed. This same wording found in section 1.4 was instead also included in section 2.10 which is entitled, "STATUTORY DETERMINATIONS."

Otherwise, this ROD seems to meet the statutory requirements for a final ground-water action.