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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON INTERIM REMEDIAL
WORK PLANS FOR STUDY AREA 35 NTC ORLANDO FL
1/22/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.35.0001

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Jeb Bush
Governor

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

Kirby B. Green, III
Secretary

January 22, 1999

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

RE: Final Draft, Base Realignment and Closure Interim Remedial
Workplans, Study Area 35, Naval Training Center, Orlando, FL

Dear Mr. Hansel:

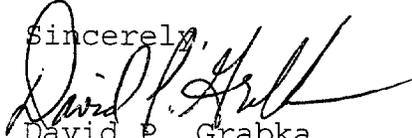
I have completed my review of the BRAC Work Plan For Interim Remedial Action for Study Area 35 (SA 35), dated September 1998 (received September 21, 1998), prepared and submitted by Harding Lawson Associates. I have the following comments on this Workplan:

- (1) Excavation Area B is proposed to extend to a depth of two feet below grade. However, arsenic was detected in subsurface soil at OLD-35-02 at levels that exceed the Department's residential soil cleanup target levels (SCTLs) and the basewide reference concentration of 1.0 mg/kg.
- (2) The removal areas specified in the report do not appear to have included all soil sampling areas where exceedances of the Department's residential soil cleanup target levels (SCTLs) were located. Specifically, surface and some subsurface soil locations at 35S00701, 35S00801, 35S00901, OLD-35-01, and OLD-35-03 had exceedances of arsenic above the Department's residential SCTL and the basewide reference concentration. These locations are not within the five removal areas specified in the report.
- (3) Confirmatory samples taken from sidewalls and the bottoms of excavations should be analyzed for TRPH and arsenic where arsenic above the Department's SCTL was detected.
- (4) While the actions specified in the Workplan are suitable to remove gross contamination detected on the site, the removal actions as specified will not completely remediate the site to a point where either residential or industrial use will be approvable by the Department.

Mr. Wayne Hansel
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If I can be of any further assistance with this matter,
please contact me at (850)488-3693.

Sincerely,



David P. Grabka
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, Brown & Root, Oak Ridge
Robert Cohose, Bechtel, Knoxville
Bill Bostwick, FDEP Central District

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