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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL DRAFT  
INTERIM REMEDIAL WORK PLAN FOR STUDY AREA 37 NTC ORLANDO FL  
1/22/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush  
Governor

# Department of Environmental Protection

09.01.37.0001

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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 37, 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 37 (SA 37), dated September-1998 (received September 21, 1998), prepared and submitted by Harding Lawson Associates. I have the following comments on this Workplan:

(1) The consultant has incorrectly stated that the Department's Soil Cleanup Goals (SCGs) would be the remedial goal option for determination of site cleanup. The SCGs have been replaced with the Department's Soil Cleanup Target Levels (SCTLs) developed for Chapter 62-785, Florida Administrative Code. These SCTLs should be compared to confirmatory sample analyses results to determine the effectiveness of the site cleanup.

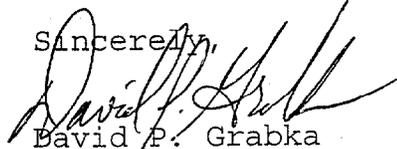
(2) It is stated that immunoassay test kits will be used to test soil samples collected from the floor of the 2 foot deep excavation to determine if additional soil should be excavated from the area. A confirmatory soil sample should be collected and analyzed in the laboratory for pesticides, PAHs and arsenic.

(3) Confirmatory soil samples should be taken on the side walls of the excavation to validate immunoassay test kit data and ensure that contamination above residential SCTLs is not left in place. Due to the small area being excavated, a composite sample of the four walls may be adequate. The sample should be analyzed for pesticides, PAHs and arsenic.

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

Mr. Wayne Hansel  
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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  
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