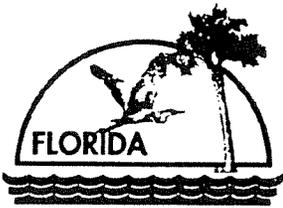


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LETTER REGARDING REGULATORY COMMENTS ON MONITORING ONLY PROPOSAL
BUILDING 200 NTC ORLANDO FL
2/11/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

Kirby B. Green, III
Secretary

February 11, 1999

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: Monitoring Only Proposal, Building 200, Main Base, NTC
Orlando, Florida
FDEP #488840202

Dear Mr. Ugolini:

I have completed the technical review of the Monitoring Only Proposal (MOP) dated January 8, 1999 (received January 11, 1999), submitted for Building 200. I found that the information provided warranted the continuation of monitoring at the site. However, I did not find the proposed monitoring scheme to be necessary. Harding Lawson Associates proposed that monitoring wells MW-2, MW-3, MW-6 and MW-8 be sampled quarterly and analyzed using EPA Methods 602 and 610 and Florida-Petroleum Residual Organics.

In an effort to find areas where environmental restoration dollars may be saved, I have looked at the monitoring scheme to determine if all the proposed wells need monitoring and if all the proposed contaminants need monitoring for. Of the proposed wells, I found that only MW-8 requires further sampling and analysis. Monitoring wells MW-2, MW-3 and MW-6 have not detected contaminants above groundwater cleanup target levels for two consecutive rounds. ✓

A monitoring well downgradient of MW-8 would also be required in a monitoring scheme to be sampled and analyzed. It is possible that MW-10, if this well still exists, could be used in that capacity. Groundwater flow maps from previous groundwater elevation measurements could be used to determine whether MW-10 would be acceptable as a downgradient well.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

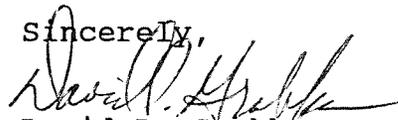
Mr. Nick Ugolini
Southern Division
Naval Facilities Engineering Command
Page two of two

I do not believe it will be necessary to analyze for volatile organics using EPA Method 602. While trace levels have been detected in monitoring wells, on only one occasion (February 3, 1997) did a volatile organic exceed its groundwater cleanup target level. At that time, xylenes were detected in monitoring well MW-3 at 20.2 µg/l, slightly exceeding its groundwater cleanup target level of 20 µg/l. Subsequent monitoring of MW-3 has detected xylenes, but at levels below its groundwater cleanup target level.

The consultant should revise and resubmit a monitoring plan for the site with the above considerations taken into account. If monitoring well MW-10 is selected as the downgradient well to MW-8, documentation should be provided that clearly shows that the well is downgradient and would capture any contaminants migrating from the MW-8 area.

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

Sincerely,



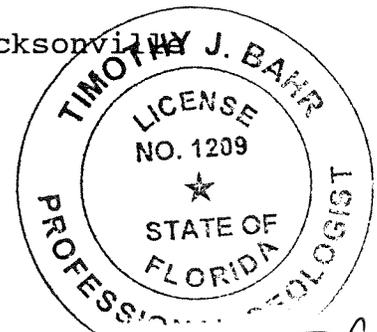
David P. Grabka
Remedial Project Manager

cc: Wayne Hansel, Navy SouthDiv
Rick Allen, Harding Lawson Associates, Jacksonville
Bob Cohose, Bechtel
Nancy Rodriguez, USEPA Region IV
Gary Whipple, NTC Orlando
Steve McCoy, TetraTech NUS, Oak Ridge
Bill Bostwick, FDEP Central District

TJB B

JJC JJC

ESN ESN



JJ Barr
2/12/99