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LETTER WITH REGULATORY APPROVAL FOR FINAL ENVIRONMENTAL SITE SCREENING
AT STUDY AREA 2 NTC ORLANDO FL
4/5/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.02.0005

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Jeb Bush
Governor

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

David B. Struhs
Secretary

April 5, 1999

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

RE: BRAC Environmental Site Screening Report, Study Area 2,
Herndon Annex, Naval Training Center, Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the BRAC Environmental Site Screening Report for Study Area 2, Herndon Annex, Naval Training Center, Orlando, dated March 10, 1999 (received March 11, 1999). I concur with the recommendations that: (1) an evaluation of remedial options and a cost benefit analysis be performed, (2) quarterly monitoring of selected monitoring wells for a period of one year to evaluate natural attenuation of benzene in the surficial aquifer be conducted, (3) temporary groundwater use restrictions be imposed for the surficial aquifer, (4) groundwater-use advisory warnings be issued to local residents, (5) that the site be restricted to its intended industrial/commercial land use, (6) that institutional controls be applied limiting intrusive activities where landfilling has occurred, (7) that the site be made eligible for transfer, and (8) that the site be reclassified from 7/Gray to 2/Blue. I have the following comments that should be addressed:

(1) The monitoring plan has only been approved for a period of one year as an interim measure to determine the potential for natural attenuation to remediate the benzene plume in the surficial aquifer. Because the plume has migrated off site, the specific requirements of Chapter 62-770, Florida Administrative Code, must be met for final authorization that monitoring only for natural attenuation is the approved remedial action for the site.

(2) Because the benzene plume has migrated off site beneath a residential area where there are reportedly lawn watering wells, a focused risk assessment should be conducted to evaluate exposures via that route. Due to the low concentrations of contaminants detected in groundwater, the exposure and risk should be minimal. However, a focused risk assessment should be

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conducted to document the risk. The risk assessment should be included in the first quarter monitoring report.

(3) Lawn watering wells within the benzene plume should be sampled and analyzed during the one-year monitoring period.

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
Robin Manning, Bechtel, Oak Ridge
Bill Bostwick, FDEP Central District

TJB JRC
for

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