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LETTER REGARDING REGULATORY REVIEW COMMENTS ON DRAFT FINDING OF
SUITABILITY TO TRANSFER AND ENVIRONMENTAL BASELINE SURVEY FOR STUDY
AREA 2 WITH TRANSMITTAL LETTER NTC ORLANDO FL
9/23/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.02.0002

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Jeb Bush
Governor

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

David B. Struhs
Secretary

September 23, 1999

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

RE: Draft, Finding of Suitability to Transfer and Environmental
Baseline Survey for Transfer for Herndon Annex, Naval
Training Center Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the Finding of Suitability to Transfer (FOST) and Environmental Baseline Survey for Transfer (EBST), Herndon Annex, Naval Training Center Orlando, dated July 13, 1999 (received July 16, 1999). I do not concur that this property is suitable for deed transfer to the City of Orlando at this time because the remedial action proposed to address the benzene plume has not been implemented and demonstrated to be effective. While the Department has accepted an interim action of quarterly monitoring for natural attenuation for a period of one year, this has not been accepted as the final remedy as it has not been proven. The property should be categorized as 5/Yellow until such time as a final remedy has been chosen and proven effective. I have the following comments that should be addressed in the FOST and EBST in the future when the property is ready for transfer:

- (1) The areas where groundwater and land use restrictions are to be enacted should be surveyed and reported in the FOST and EBST. Also, the aerial extent of groundwater contamination that has migrated off property should likewise be surveyed and reported in the FOST and EBST. Site diagrams delineating the areas where groundwater and land use restrictions are to be implemented should be attached to the FOST and EBST.
- (2) The FOST should mention that the benzene plume has migrated off the Herndon Annex property under an adjacent neighborhood at levels exceeding Florida primary drinking water standards.

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- (3) Section 5.3, Paragraph 6 of the EBST should state that "concentrations of hazardous substances found in surface soils, including the cover over the landfill areas, were within acceptable EPA and FDEP risk ranges for the potential future site worker."
- (4) Section 5.3, Paragraph 7 of the EBST should mention that although no potable wells were discovered during a well survey, a number of irrigation wells were found. The number and location of the irrigation wells, within one quarter of one mile of the site, should be specified in the EBST.
- (5) Section 5.3 of the EBST should better describe the distribution of the benzene plume, including that it has migrated off the Herndon Annex property under the Azalea Park neighborhood.
- (6) Section 4.2 of the EBST should discuss the site specific hydrology including groundwater flow directions and gradients (horizontal and vertical), surface water bodies, recharge and discharge areas, etc. The hydrology description is too general.
- (7) The figure in Appendix I does not show locations of wetlands at Herndon Annex in enough detail.
- (8) The agreed upon mechanisms for implementing land and groundwater use restrictions should be specified in the FOST and EBST. The agreed upon mechanism is a Restrictive Covenant granting a perpetual conservation easement to the FDEP that may be enforced by the Department through injunctive relief.

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

Sincerely,



David B. Grabka
Remedial Project Manager

cc: Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge

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Al Aikens, CH2M Hill, Orlando
Bill Bostwick, FDEP Central District

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