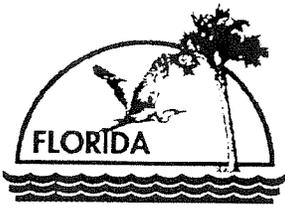


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LETTER REGARDING REGULATORY REVIEW AND COMMENTS FOR SITE ASSESSMENT  
FOR BUILDING 7175 NTC ORLANDO FL  
10/27/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

October 27, 1999

Mr. Nick Ugolini  
Code 1843 (UST RPM)  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report, Building 7175, McCoy Annex, Naval Training Center, Orlando, Florida

Dear Mr. Ugolini:

I have completed the review of the Site Assessment Report (SAR) and request for Monitoring Only for Natural Attenuation for Building 7175, McCoy Annex, NTC Orlando, dated September 21, 1999 (received September 22, 1999), prepared and submitted by Harding Lawson Associates. I have the following comments that should be addressed in a Site Assessment Report Addendum:

- (1) While the initial information provided in the SAR would indicate that Monitoring Only for Natural Attenuation will most likely be an acceptable remedy for this site, further delineation of the plume is required to refine a Monitoring Only Plan.
- (2) Microwell MC-2, proposed as a downgradient well for monitoring, is not directly downgradient of monitoring well MW-4, the well where most contamination was detected. Monitoring wells should be installed to further refine the shape of the groundwater plume migrating from the tank pit area that was excavated.
- (3) Monitoring well MW-4, proposed as a source well, is apparently a compliance well installed for the purpose of release detection for the USTs that were closed in 1993. Because the construction of this well is in doubt, it may not be suitable for monitoring as the results from the well may not be directly comparable to other wells installed on site. Either this well should be investigated to determine its suitability for monitoring or it should be replaced with a standard monitoring well. Monitoring well MW-3, although not proposed as a well to be monitored, should likewise be

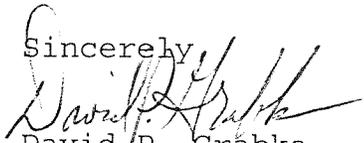
Mr. Nick Ugolini  
UST 7175  
Naval Training Center, Orlando  
October 27, 1999  
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investigated to determine the reliability of data from that well.

- (4) Monitoring wells MW-3 and MW-4 (or their replacements), MW-5, MC-2 and those monitoring wells requested above should be sampled and analyzed for volatiles and PAHs. Microwell MC-2 should also be sampled using the quiescent sampling technique to reduce turbidity and analyzed for lead. If turbidity cannot be reduced using the quiescent sampling technique, filtered and unfiltered samples may be collected for lead analyses.
- (5) Tetra Tech NUS apparently collected five preburn analytical samples from the site prior to excavation activities. The analytical results are reported in Appendix B to the SAR. As four of the five samples had contaminant concentrations greater than the Department's Soil Cleanup Target Levels for leachability, it may be useful to know where those samples were collected in relation to the soil excavation and monitoring wells.

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: Bill Bostwick, FDEP Central District Office  
Rick Allen, Harding Lawson Associates, Jacksonville  
Wayne Hansel, U.S. Navy, Southern Division  
Nancy Rodriguez, USEPA, Region 4  
Steve McCoy, Tetra Tech NUS, Oak Ridge, TN  
Alan Aiken, CH2M Hill, Orlando

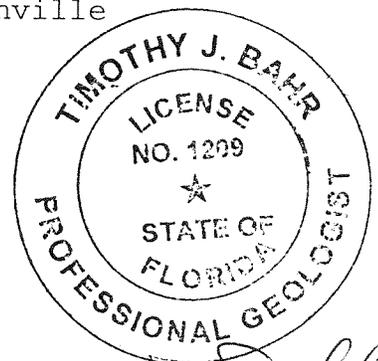
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