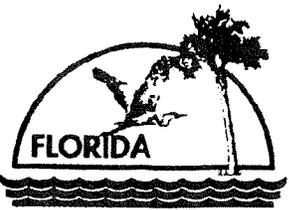


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LETTER REGARDING REGULATORY REVIEW AND NONCURRENCE OF GROUNDWATER  
QUARTERLY MONITORING AND ANNUAL STATUS FOR BUILDING 7174 NTC ORLANDO  
FL  
4/4/2001  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

April 4, 2001

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

RE: Groundwater Quarterly Monitoring Report and Annual Status  
Report, Building 7174, McCoy Annex  
Naval Training Center Orlando  
Orlando, Florida

Dear Mr. Ugolini:

I have completed my review of the Groundwater Quarterly Monitoring Report and Annual Status Report for Building 7174, McCoy Annex, Orlando Naval Training Center, dated March 13, 2001 (received March 13, 2001), prepared and submitted by CH2MHILL Constructors, Inc. I cannot concur that groundwater at the site has attained all the Groundwater Cleanup Target Levels (GCTLs) as specified in Chapter 62-770, Florida Administrative Code (F.A.C.). Apparently, methyl tert-butyl ether (MTBE) has been detected in monitoring well OLD-7174-28 consistently above its GCTL during the period of operation of the biosparge system. However, the concentrations of MTBE detected have been less than its natural attenuation default source concentration. That MTBE has not been identified as a contaminant of concern or discussed in the text portion of the quarterly groundwater monitoring reports is apparently an oversight.

While the Department is not adverse to discontinuing the operation of the biosparge system and monitoring the site for natural attenuation, the Navy should evaluate whether continued operation of the biosparge system may lead to a more expedited site cleanup. At such time as groundwater at the site attains the GCTLs for all petroleum constituents, please submit a Post Active Remediation Monitoring Plan in accordance with F.A.C. Section 62-770.750. Please note that the monitoring plan require that a minimum of two wells be monitored and that monitoring shall be quarterly for a minimum of one year.

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

Mr. Nick Ugolini  
Building 7174  
Naval Training Center, Orlando  
April 4, 2001  
Page two

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  
Steve Tsangaris, CH2M Hill, Tampa

TJB B      JJC JJC      ESN ESN