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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO WORK PLAN ADDENDUM ABBREVIATED WORK PLAN FOR ADDITIONAL REMEDIAL ACTION PRE-DESIGN ACTIVITIES, OPERABLE UNIT 2 (OU 2) NTC ORLANDO FL
12/8/2004
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

December 8, 2004

Commanding Officer
Attn: Barbara Nwokike, RPM
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Work Plan Addendum, Abbreviated Work Plan for Additional Remedial Action Pre-Design Activities, Operable Unit 2, Naval Training Center, Orlando, Florida

Dear Mrs. Nwokike:

The Department has reviewed the Work Plan Addendum, Abbreviated Work Plan for Additional Remedial Action Pre-Design Activities, Operable Unit 2, Orlando Naval Training Center, dated December 1, 2004 (received by e-mail December 1, 2004), prepared by CH2M Hill. The Department has the following comments on the Work Plan:

(1) The critical element for the Permeable Reactive Barrier (PRB) design appears to be the hydraulic conductivity of the underlying clay layer that begins at approximately 30 to 35 feet below land surface. The actual depths and hydraulic properties of this clay layer would seem to be necessary in determining the potential costs of installing the PRB and determining the potential for flow under the PRB. The Department suggests conducting a pump test with possibly some slug tests within the clay unit to determine the hydraulic properties of that layer. If pump and slug tests are not feasible because of the properties of the clay unit, split spoon or core samples could be collected from the unit and permeameter tests run on the samples to determine the clay unit's hydraulic conductivity.

(2) Given the potential costs of installing the PRB at Operable Unit 2, it may be beneficial to consider running a three-dimensional groundwater flow model to predict groundwater and contaminant flow through an installed PRB. The model may help determine if there are significant risks of either groundwater flow under the PRB or lateral "flow-around" the

PRB, as well as determining residence time for contaminated groundwater to be in contact with the PRB.

If I can be of any further assistance with this matter, please contact me at (850) 245-8997.

Sincerely,

David P. Grabka, P.G.
Remedial Project Manager

cc: Greg Fraley, EPA Region 4
Steve Tsangaris, CH2M Hill, Tampa
Steve McCoy, Tetra Tech NUS, Oak Ridge

JJC JJC ESN ESN