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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO PROPOSED PLAN FOR
OPERABLE UNIT 2 (OU 2) NTC ORLANDO FL
2/23/2007
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 23, 2007

BRAC PMOSE

Attn: Mrs. Barbara Nwokike
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

125-102-81

RE: Proposed Plan for Operable Unit 2, Former Naval Training Center Orlando,
Orlando, Florida.

Dear Mrs. Nwokike:

I have completed my review of the revised Proposed Plan for Operable Unit 2, Former Naval Training Center Orlando, dated November 2006. I have the following comments:

- (1) In the Site Characteristics section discussing the interim remedial action on the southern portion of the golf course, please explain that the excavations conducted were to clean up the golf course portion of Operable Unit 2 to levels protective of the golf course worker, but not to levels deemed by FDEP to be protective for residential use.
- (2) On page 5, the Remedial Action Objective 3 which is crossed out should be reinserted. This Remedial Action Objective (RAO) concerns protecting human health from risks associated with surface and subsurface soil. This RAO is applicable because soil contamination remains on the golf course above residential soil cleanup target levels (SCTLs) and because some of the fill used for additional cover on the southern portion did not meet residential SCTLs.
- (3) On page 5, the RAO 4 that is crossed out may remain crossed out. There is no evidence that contamination is leaching from soil to groundwater.
- (4) On page 5, second column, in the section called Summary of Remedial Alternatives, first sentence, please add soil contamination to the media of concern.
- (5) On page 5, for Alternative N-2, it says that soil cover will be inspected for erosion and maintenance needs on a quarterly basis. Please add that when

erosion is detected or it is determined that maintenance is required, that the required work to repair the landfill cover will be conducted.

- (6) On page 7, in the section called Proposed Plan, please add that the plan addresses potential risk from contaminated soil as well as from buried landfill material and groundwater contamination.
- (7) On page 11, in the section called Proposed Plan, please add that Land Use Controls (LUCs) will include restrictions to prohibit residential use on the northern part of the Operable Unit covered by the golf course. The LUCs stated for the southern portion of the site, or at least the southern groundwater plume, correctly have the residential prohibition.
- (8) On page 12, first column, bottom of the page, please change it to read "protect the public health and welfare and the environment ..."
- (9) Please add the soil contaminants arsenic and polynuclear aromatic hydrocarbons to the list of chemicals of concern as they are the soil contaminants either remaining in soils on the golf course above residential SCTLs or were the contaminants in some of the fill used for additional soil cover in the southern portion of Operable Unit 2.
- (10) Please add a short discussion on soil contamination and the need for non-residential LUCs to the section on page 12 titled Reasons for Selection of the Recommended Remedy.

If you have any concerns regarding this letter, please contact me at (850) 245-8997

Sincerely,



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

CC: Greg Fraley, EPA Region 4
Sam Naik, CH2M Hill, Atlanta
Steve McCoy, Tetra Tech NUS, Oak Ridge

