

N65928.AR.002736  
NTC ORLANDO  
5090.3a

LETTER REGARDING SITE ASSESSMENT ADDENDUM FOR BUILDING 369 MAIN BASE  
WITH ATTACHMENTS NTC ORLANDO FL  
2/17/1999  
HARDING LAWSON ASSOCIATES



February 17, 1999

Document No. 02530.087

Mr. David Grabka  
Remedial Project Manager  
State of Florida  
Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

**Subject: Naval Training Center, Orlando, Florida  
Building 369, Main Base  
Site Assessment Report Addendum  
CTO 137, Contract No.: N62467-89-D-0317**

Dear Mr. Grabka:

A site assessment report (SAR) was submitted for Building 369 on April 28, 1998. The SAR recommended a no further action (NFA) for the site. During the Florida Department of Environmental Protection (FDEP) review, Mr. John Mitchell requested that the soil laboratory analytical results be presented in milligrams per liter (mg/l) because the results were reported incorrectly in the SAR. The soil analytical results for U.S. Environmental Protection Agency (USEPA) Method 1312, synthetic precipitation leaching procedures should be reported in mg/l and should be compared to the State of Florida's groundwater target cleanup levels. Harding Lawson Associates (HLA) supplied the soil laboratory analytical results in a letter dated June 3, 1998. On October 20, 1998, FDEP provided a response to the SAR and supplemental information, and requested additional soil sampling in order to better evaluate the NFA request for the site. FDEP requested that "at a minimum, a soil sample from 0 to 2 feet should be collected outside the area excavated during tank closure, and confirmatory soil samples be taken at the same locations and depths as SS-1 and SS-2." A copy of the October 20, 1998, FDEP letter is in Attachment A.

On December 10, 1998, HLA collected soil samples as requested by FDEP. Soil sample SS-1 was collected at a depth ranging from 4 to 6 feet below land surface (bls) from the area where SB-1 was advanced during the site assessment, and SS-2 was collected at a depth of 4 to 6 feet bls from the area where SB-4 was advanced. In addition, soil sample SS-3 was collected from 0 to 2 feet bls at soil boring SB-14 location. Figure 1 in Attachment B shows the soil boring locations.

Soil samples collected were shipped to Savannah Laboratories of Savannah, Georgia, to be analyzed using USEPA Methods 8020 (purgeable aromatics), 8310 (polynuclear aromatics), and total recoverable petroleum hydrocarbons (TRPH) using the Florida-Petroleum Residual Organic. Laboratory analytical results for soil sample SS-1 show TRPH at 660 milligrams per kilogram (mg/kg), which exceeds the State of Florida's soil cleanup target level (SCTL) for residential exposure (350 mg/kg), but is below the SCTL for industrial

exposure. The rest of the other parameters tested in SS-1 were reported as below standard laboratory detection limits. Laboratory analytical results for SS-2 were reported as below laboratory standard detection limits. Benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene were reported at 0.0062 mg/kg, 0.0074 mg/kg, and 0.012 mg/kg, respectively, in soil sample SS-3 collected at SB-14 from 0 to 2 feet bls. In addition, benzo(k)fluoranthene was reported at 0.0097 mg/kg, fluoranthene at 0.016 mg/kg, and pyrene at 0.015 mg/kg. All the reported values above are below the State of Florida's SCTL. The rest of the parameters tested for were reported as below standard laboratory detection limits. Table 1 in Attachment B presents the soil analytical results, and the laboratory analytical reports are in Attachment C.

On December 10, 1998, water-level measurements were obtained from the site's monitoring wells and piezometers. In addition, the monitoring wells and piezometers were inspected for the presence of free-floating petroleum product or visual signs of petroleum. No petroleum product was found during the water-level measurements.

Based on the information provided in the SAR dated April 28, 1998, supplemental information provided on June 3, 1998, and laboratory analytical results of soil samples collected on December 10, 1998, HLA recommends an NFA Proposal for the site.

Should you have any questions regarding this data, please call the undersigned at (407) 895-8845.

Very Truly Yours,  
**HARDING LAWSON ASSOCIATES**

  
John P. Kaiser  
Installation Manager

  
Manuel Alonso, P.G.  
Senior Geologist  
P.G. # 0001256  
2/17/99

cc: Wayne Hansel, Southern Division  
Nick Ugolini, Southern Division  
Lt. Gary Whipple, NTC, Orlando  
Rick Allen, HLA

**ATTACHMENT A**

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW LETTER, OCTOBER 20, 1998**

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wether  
Secretary

October 20, 1998 

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

RE: Site Assessment Report, Building 369, Main Base, NTC  
Orlando, Florida, April 27, 1998

Dear Mr. Hansel:

I have completed my review of the Site Assessment Report (SAR) and No Further Action Proposal (NFAP) for Building 369, Main Base, NTC Orlando, prepared and submitted by ABB Environmental Services, Inc. (now Harding Lawson Associates). I have also reviewed the supplemental information provided in a June 3, 1998 letter concerning SPLP soil laboratory analytical results. I have the following comments that should be addressed before a decision is made on the appropriateness of the No Further Action Proposal:

(1) There appears to be little correlation between OVA headspace readings and soil laboratory analyticals in determining contaminated soils. The soil sample at location SB-1, taken from 4 to 6 feet below land surface, had a Total Hydrocarbon reading by OVA of 5 ppm. The confirmatory laboratory soil sample SS-1 taken at the same location and depth had a concentration of TRPH in exceedance of the Residential Direct Exposure Soil Cleanup Target Level. The soil sample at location SB-4, taken from 4 to 6 feet below land surface, had a Total Hydrocarbon reading by OVA of less than 1 ppm. The confirmatory soil sample taken for laboratory analysis (SS-2) from the same location and depth, had an exceedance of the Residential Direct Exposure Soil Cleanup Target Level for Benzo(a)anthracene. Also, the detection limit for Benzo(a)pyrene in soil sample SS-2 exceeded its Residential Direct Exposure Soil Cleanup Target Level. The detection limit for Dibenzo(a,h)anthracene in soil sample SS-2 exceeded both its Residential and Industrial Direct Exposure Soil Cleanup Target Level. Therefore, additional soil sampling for laboratory analysis is needed to establish the degree and extent of soil contamination. At a minimum, a soil sample from 0 to 2 feet should be collected outside the area excavated during tank closure, and confirmatory soil samples should be taken at the same locations and depths as SS-1 and SS-2. Additional soil assessment should be performed if contamination is detected in

Mr. Wayne Hansel  
October 20, 1998  
Building 369, Main Base  
Page 2 -

the requested sampling. Depending upon the analytical results, this site may qualify for No Further Action or No Further Action with one of the following institutional controls:

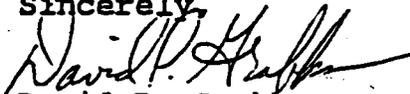
(a) Deed restriction to industrial/commercial use.

(b) Deed restriction requiring appropriate testing and possibly disposal of subsurface soils if they should be excavated.

(2) The summary of soil analytical results included in the supplemental information provided in the June 3, 1998 letter incorrectly compares SPLP leachate concentrations to Chapter 62-770, Florida Administrative Code Leachability Based Soil Target Cleanup Levels. The leachate concentrations should be compared to Groundwater Cleanup Target Levels. As the leachate concentrations do not exceed Groundwater Cleanup Target Levels, it is not necessary to revise the summary table.

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: Lt. Gary Whipple, NTC Orlando  
Barbara Nwokike, Navy SouthDiv  
Nancy Rodriguez, USEPA Region 4  
Richard Allen, HLA, Jacksonville  
Steve McCoy, Brown and Root, Oak Ridge  
Bob Cohose, Bechtel, Knoxville  
Bill Bostwick, FDEP Central District

TJB



JJC



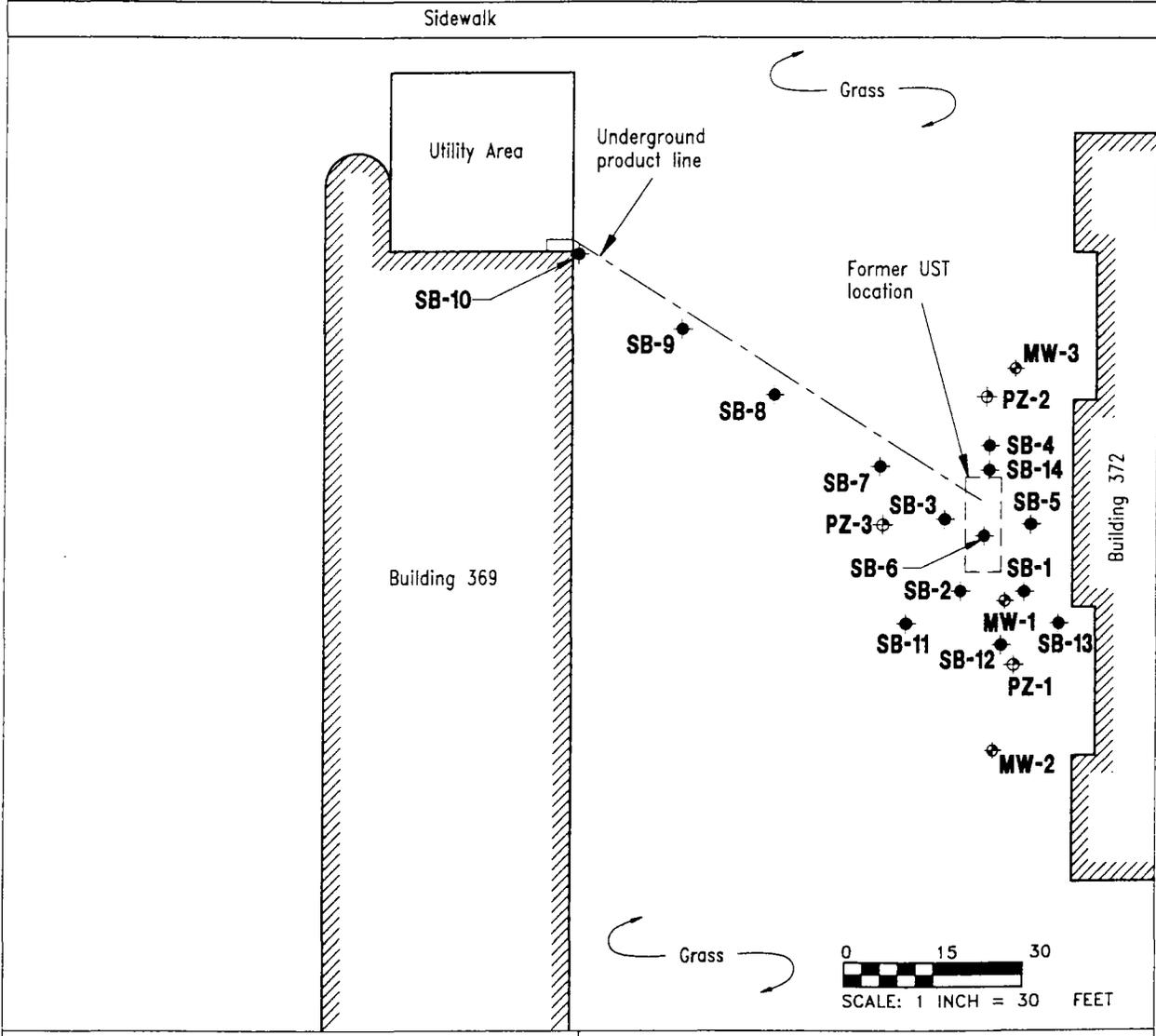
ESN



**ATTACHMENT B**  
**FIGURE AND TABLE**



LEGEND	
SB-1	◆ Soil boring location and designation
MW-1	⊕ Monitoring well location and designation
PZ-1	⊕ Piezometer location and designation
UST	Underground storage tank



**FIGURE 1**  
**SOIL BORING LOCATION PLAN**  
**DECEMBER 10, 1998**



**SITE ASSESSMENT REPORT**  
**ADDENDUM, BUILDING 369**  
**MAIN BASE**  
**NAVAL TRAINING CENTER**  
**ORLANDO, FLORIDA**

Table  
Summary of Soil Analytical Results (December 10, 1998)

Building 369, Main Base  
Naval Training Center  
Orlando, Florida

Parameter	Direct Exposure Soil * Cleanup Target Levels (mg/kg)		Soil Sample/Sample Date		
	Residential	Industrial	SS-1	SS-2	SS-3
			12/10/98	12/10/98	12/10/98
Benzene	1.1	1.5	<0.0063	<0.0055	<0.0053
Toluene	300	2000	<0.0063	<0.0055	<0.0053
Ethylbenzene	240	240	<0.0063	<0.0055	<0.0053
Total xylenes	290	290	<0.0063	<0.0055	<0.0053
MTBE	350	6100	<0.063	<0.055	<0.053
TRPH	350	2500	660	<10	<10
Acenaphthene	2300	22000	<0.053	<0.052	<0.050
Acenaphthylene	1100	11000	<0.021	<0.021	<0.020
Anthracene	19000	290000	<0.0042	<0.0042	<0.0040
Benzo(a)anthracene	1.4	5.1	<0.0042	<0.0042	0.0062
Benzo(a)pyrene	0.1	0.5	<0.0042	<0.0042	0.0074
Benzo(b)fluoranthene	1.4	5	<0.0042	<0.0042	0.012
Benzo(g,h,i)perylene	2300	45000	<0.010	<0.010	<0.010
Benzo(k)fluoranthene	15	52	<0.0042	<0.0042	0.0051
Chrysene	140	490	<0.0042	<0.0042	0.0097
Dibenzo(a,h)anthracene	0.1	0.5	0.0092J	<0.010	<0.010
Fluoranthene	2800	45000	<0.010	<0.010	0.016P
Fluorene	2100	24000	<0.010	<0.010	<0.010
Ideno(1,2,3-cd)pyrene	1.5	5.2	<0.010	<0.010	<0.010
Naphthalene	1000	8600	<0.021	<0.021	<0.020
Phenanthrene	1900	29000	<0.0042	<0.0042	<0.0040
Pyrene	2200	40000	<0.010	<0.010	0.015
1,2-dichloroethane	0.6	0.9	NA	NA	NA

\* Cleanup target levels for residential and industrial exposure as defined in Table IV of Chapter 62-770, FAC.

Notes: All concentrations in milligrams per kilogram (mg/kg).

FAC = Florida Administrative Code.

J = estimated value.

< = less than.

NA = not available.

MTBE = methyl tert-butyl ether.

P = Difference between GC and HPLC columns is greater than 25%. Lower value reported.

TRPH = Total recoverable petroleum hydrocarbons (by Florida petroleum residual organics analysis).

**ATTACHMENT C**  
**LABORATORY ANALYTICAL REPORTS**

# SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

5102 LaRoche Avenue • Savannah, GA 31404 • (912) 354-7858 • Fax (912) 352-0165

LOG NO: S8-87716  
 Received: 11 DEC 98  
 Reported: 28 DEC 98

Mr. Scott Donelick  
 Harding Lawson Associates  
 1080 Woodcock Road  
 Orlando, FL 32803

Client PO. No.: NE753107G

Requisition: RFP#ATQ97-031  
 Contract No.: N62467-89-D-0317  
 Project: NTC Orlando-354/2547-06/SDG#ABOR  
 Sampled By: Client  
 Code: 160781228

REPORT OF RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES	DATE/ TIME SAMPLED	SDG#	
87716-1	077SS103/369 SB-1	12-10-98/1000	ABOR28	
87716-2	077SS203/369 SB-4	12-10-98/1014	ABOR28	
87716-3	077SS301/369 SB-14	12-10-98/1022	ABOR28	
PARAMETER		87716-1	87716-2	87716-3
Purgeable Aromatics (8020)				
Benzene, ug/kg dw		6.3U	5.5U	5.3U
Toluene, ug/kg dw		6.3U	5.5U	5.3U
Ethylbenzene, ug/kg dw		6.3U	5.5U	5.3U
Total Xylenes, ug/kg dw		6.3U	5.5U	5.3U
Methyl tert-butyl ether (MTBE), ug/kg dw		63U	55U	53U
Surrogate - a,a,a-Trifluorotoluene		137 %	124 %	112 %
Date Analyzed		12.14.98	12.15.98	12.14.98
Dilution factor		1.0	1.0	1.0
Batch ID		1A1214	1A1215	1A1214

LOG NO: S8-87716  
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87716-2	077SS203/369 SB-4	12-10-98/1014	ABOR28
87716-3	077SS301/369 SB-14	12-10-98/1022	ABOR28
PARAMETER		87716-1	87716-2
Polynuclear Aromatics (8310)			87716-3
Acenaphthene, ug/kg dw		53U	50U
Acenaphthylene, ug/kg dw		21U	20U
Anthracene, ug/kg dw		4.2U	4.0U
Benzo(a)anthracene, ug/kg dw		4.2U	6.2
Benzo(a)pyrene, ug/kg dw		4.2U	7.4
Benzo(b)fluoranthene, ug/kg dw		4.2U	12
Benzo(g,h,i)perylene, ug/kg dw		10U	10U
Benzo(k)fluoranthene, ug/kg dw		4.2U	5.1
Chrysene, ug/kg dw		4.2U	9.7
Dibenzo(a,h)anthracene, ug/kg dw		9.2U	10U
Fluoranthene, ug/kg dw		10U	16P
Fluorene, ug/kg dw		10U	10U
Indeno(1,2,3-cd)pyrene, ug/kg dw		10U	10U
Naphthalene, ug/kg dw		21U	20U
Phenanthrene, ug/kg dw		4.2U	4.0U
Pyrene, ug/kg dw		10U	15
1-Methylnaphthalene, ug/kg dw		21U	20U
2-Methylnaphthalene, ug/kg dw		21U	20U
Surrogate - Terphenyl - d14		75 %	73 %
Date Extracted		12.16.98	12.16.98

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87716-2	077SS203/369 SB-4	12-10-98/1014	ABOR28	
87716-3	077SS301/369 SB-14	12-10-98/1022	ABOR28	
PARAMETER		87716-1	87716-2	87716-3
Date Analyzed		12.19.98	12.19.98	12.19.98
Dilution factor		1.0	1.0	1.0
Batch ID		1216J	1216J	1216J
Instrument ID		LCAUV	LCAUV	LCAUV
Initial Volume/Weight		30.0	30.1	30.0
Final Extraction Volume (FV1)		1.0	1.0	1.0
Petroleum Range Organics (FL-PRO)				
Petroleum Range Organics (FL-PRO), mg/kg dw		660	10U	10U
Surrogate -- O-Terphenyl (OTP)		74 %	77 %	76 %
Dilution factor		5.0	1.0	1.0
Date Extracted		12.17.98	12.17.98	12.17.98
Date Analyzed		12.21.98	12.21.98	12.21.98
Batch ID		1217W	1217W	1217W
Initial Volume/Weight		30.0	30.0	30.0
Final Extraction Volume (FV1)		2.0	2.0	2.0
Percent Solids		95	96	99

Methods: EPA SW-846, Update III.

  
Linda A. Wolfe, Project Manager

# FedEx USA Airbill

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Form I.D. No.

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Date 12-10-98

Sender's Name SCOTT DWELICK Phone 407 1895-8845

Company LEADING LAWSON ASSOCIATES 58-87716

Address 1080 WOODCOCK ROAD SUITE 100  
Dept./Floor/Suite/Room

City ORLANDO State FL ZIP 32803

### 2 Your Internal Billing Reference Information

2547-06

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Recipient's Name LINDA WOLFE (SAMPLES) Phone 912 1354-7858

Company SAVANNAH LABS

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# SL SAVANNAH LABORATORIES & ENVIRONMENTAL SERVICES, INC.

5102 LaRoche Avenue • Savannah, GA 31404 • (912) 354-7858 • Fax (912) 352-0165

LOG NO: S8-ABOR28  
Received: 18 DEC 98  
Reported: 23 DEC 98

Mr. Scott Donelick  
Harding Lawson Associates  
1080 Woodcock Road  
Orlando, FL 32803

Client PO. No.: NE753107G

Requisition: RFP#ATQ97-031  
Contract No.: N62467-89-D-0317  
Project: NTC Orlando-354/2547-06/SDG#ABOR

Sampled By:  
Code: 161081228  
Page 1

## REPORT OF RESULTS

LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR SOLID/SEMISOLID	DATE/ TIME SAMPLED	SDG#
ABOR28-1	Method Blank		ABOR28
ABOR28-2	Lab Control Standard % Recovery		ABOR28
ABOR28-3	Method Blank		ABOR28
ABOR28-4	Lab Control Standard % Recovery		ABOR28

PARAMETER	ABOR28-1	ABOR28-2	ABOR28-3	ABOR28-4
Purgeable Aromatics (8020)				
Benzene, ug/kg dw	5.0U	111 %	5.0U	96 %
Toluene, ug/kg dw	5.0U	114 %	5.0U	98 %
Ethylbenzene, ug/kg dw	5.0U	---	5.0U	---
Total Xylenes, ug/kg dw	5.0U	---	5.0U	---
Methyl tert-butyl ether (MTBE), ug/kg dw	50U	---	50U	---
Surrogate - a,a,a-Trifluorotoluene	93 %	111 %	127 %	111 %
Date Analyzed	12.14.98	12.14.98	12.15.98	12.15.98
Dilution factor	1.0	1.0	1.0	1.0
Batch ID	1A1214	1A1214	1A1215	1A1215

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ABOR28-2	Lab Control Standard % Recovery		ABOR28
ABOR28-3	Method Blank		ABOR28
ABOR28-4	Lab Control Standard % Recovery		ABOR28

PARAMETER	ABOR28-1	ABOR28-2	ABOR28-3	ABOR28-4
Polynuclear Aromatics (8310)				
Acenaphthene, ug/kg dw	50U	54 %	---	---
Acenaphthylene, ug/kg dw	20U	65 %	---	---
Anthracene, ug/kg dw	4.0U	85 %	---	---
Benzo(a)anthracene, ug/kg dw	4.0U	82 %	---	---
Benzo(a)pyrene, ug/kg dw	4.0U	70 %	---	---
Benzo(b)fluoranthene, ug/kg dw	4.0U	88 %	---	---
Benzo(g,h,i)perylene, ug/kg dw	10U	96 %	---	---
Benzo(k)fluoranthene, ug/kg dw	4.0U	90 %	---	---
Chrysene, ug/kg dw	4.0U	82 %	---	---
Dibenzo(a,h)anthracene, ug/kg dw	10U	82 %	---	---
Fluoranthene, ug/kg dw	10U	82 %	---	---
Fluorene, ug/kg dw	10U	70 %	---	---
Indeno(1,2,3-cd)pyrene, ug/kg dw	10U	76 %	---	---
Naphthalene, ug/kg dw	20U	55 %	---	---
Phenanthrene, ug/kg dw	4.0U	85 %	---	---
Pyrene, ug/kg dw	10U	88 %	---	---
Surrogate - Terphenyl - d14	88 %	102 %	---	---
Date Extracted	12.16.98	12.16.98	---	---
Date Analyzed	12.18.98	12.21.98	---	---

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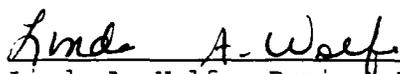
Sampled By:  
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Page 3

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LOG NO	SAMPLE DESCRIPTION , QC REPORT FOR SOLID/SEMISOLID	DATE/ TIME SAMPLED	SDG#
ABOR28-1	Method Blank		ABOR28
ABOR28-2	Lab Control Standard % Recovery		ABOR28
ABOR28-3	Method Blank		ABOR28
ABOR28-4	Lab Control Standard % Recovery		ABOR28

PARAMETER	ABOR28-1	ABOR28-2	ABOR28-3	ABOR28-4
Dilution factor	1.0	1.0	---	---
Batch ID	1216J	1216J	---	---
Instrument ID	LCAUV	LCAUV	---	---
Initial Volume/Weight	30.0	30.0	---	---
Final Extraction Volume (FV1)	1.0	1.0	---	---
2-Methylnaphthalene, ug/kg dw	20U	59 %	---	---
1-Methylnaphthalene, ug/kg dw	20U	59 %	---	---
Petroleum Range Organics (FL-PRO)				
Petroleum Range Organics (FL-PRO), mg/kg dw	10U	64 %	---	---
Surrogate - O-Terphenyl (OTP)	70 %	82 %	---	---
Dilution factor	1.0	1.0	---	---
Date Extracted	12.17.98	12.17.98	---	---
Date Analyzed	12.21.98	12.22.98	---	---
Batch ID	1217W	1217W	---	---
Initial Volume/Weight	30.0	30.0	---	---
Final Extraction Volume (FV1)	2.0	2.0	---	---

Methods: EPA SW-846, Update III.

  
Linda A. Wolfe, Project Manager

**SL SAVANNAH LABORATORIES**  
**& ENVIRONMENTAL SERVICES, INC.**

5102 LaRoche Avenue • Savannah, GA 31404 • (912) 354-7858 • Fax (912) 352-0165

Date - 12/28/98  
Time - 05:05PM

Electronic Data Deliverable Form

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Form 61514

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SL Division : Savannah, Georgia  
SL Project Manager : Linda A. Wolfe

Client Code : ABB-FL  
Customer : Harding Lawson Associates  
Contact : Mr. Scott Donelick  
Contact Phone : 407/895-8845

EDD Description : NTC Orlando-354/2547-06/SDG#ABOR  
EDD created by : John S. Cash  
LIMS EDD Program used : %VIA.ABB.BP

-----  
This EDD contains the following 2 PC data file(s):

S887716.TXT      README.TXT

-----  
This EDD was created using the following 1 order(s) from the SL LIMS:

Order Number	Recd Date	Rept Date	Project Name
=====	=====	=====	=====
S887716	12/11/98	12/28/98	NTC Orlando-354/2547-06/SDG#ABOR

-----  
If you have any questions or problems with this EDD please call  
Linda A. Wolfe at 912/354-7858.