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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON THE DRAFT PROPOSED PLAN FOR OPERABLE UNIT 3 (OU 3) NTC  
ORLANDO FL  
4/26/2012  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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April 26, 2012

BRAC PMO SE

Attn: Mr. Art Sanford  
4130 Faber Place Drive  
Suite 202  
North Charleston, SC 29405

RE: Draft Proposed Plan for Operable Unit 3, Former Naval Training Center Orlando, Orlando, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft Proposed Plan for Operable Unit 3, Former Naval Training Center Orlando, dated November 2011 (received November 18, 2011). I have the following comments on the Draft Proposed Plan:

- (1) Please review all instances where EPA is cited as having developed the preferred cleanup plan with the Navy or where EPA will consider comments on the Proposed Plan. As EPA is no longer an active Orlando Partnering Team (OPT) member, the public may understandably be misinformed as to EPA's input into the final remedy decision being proposed.
- (2) The Proposed Plan describes only the Navy's preferred remedy for groundwater contamination. Soil contamination remained after interim remedial actions such that land use controls were required at the time of property transfer prohibiting residential use of portions of both Study Areas 8 and 9. Study Area 8 was transferred by deed on April 29, 2005 and Study Area 9 was transferred July 15, 2005. At about that time, the Department issued new soil cleanup target levels. Also, a new rule, Chapter 62-780, Florida Administrative Code, was enacted that provided for a new methodology for assessing risks and conducting remediation at cleanup sites. A statement concerning whether the land use controls that have been implemented at Study Areas 8 and 9 are protective, adequate or no longer necessary is not made as only the groundwater remedy is really discussed.
- (3) In the Nature and Extent of Contamination at OU 3, it says that the OPT reclassified both Study Areas 8 and 9 from residential to recreational. This

should be reworded to say that based on the OPT's understanding of the future intended use of Study Areas 8 and 9 as open, undeveloped land between residential housing and Lake Baldwin, cleanup of soils at both sites was only conducted to be protective of that future intended use. Non-residential use restrictions were implemented via deed restrictions at the time the Navy transferred the properties to the City of Orlando.

- (4) The preferred remedial alternative in the Proposed Plan is G-2, In Situ Permeable Treatment Walls. This proposal essentially just formally chooses a remedy already implemented at OU 3 through the Treatability Study and subsequent groundwater monitoring. Therefore, the discussion in the Proposed Plan should be whether there is a need to conduct more active remediation in order to speed up cleanup, address groundwater contamination that is already past the treatment walls, address contamination other than arsenic that is not amenable for treatment by the treatment walls, address contamination that might migrate around the ends of the treatment walls, or to address contamination before it discharges to Lake Baldwin. In order to clearly discuss the various remedial options discussed in the Proposed Plan, first there needs to be a better discussion of how the interim remedial actions and the treatability study have affected groundwater contaminant concentrations. It says in the Proposed Plan that groundwater conditions have improved at both Study Areas 8 and 9 since the Remedial Investigation (RI) Report was written. How much has it improved? Lateral extent? Mass of contaminants/percent removal? Maximum concentrations? Have chemicals of concern been added or removed since the RI? Use this discussion as the base argument for the Navy either continuing as they have or whether something additional with regard to active remediation might be necessary or advisable.
- (5) On page 15, Table 1: OU 3 Groundwater PRGs, the GCTLs for  $\alpha$ -BHC and  $\beta$ -BHC are 0.006  $\mu\text{g}/\text{L}$  and 0.02  $\mu\text{g}/\text{L}$ , respectively. However, the target PQL for both pesticides is 0.05  $\mu\text{g}/\text{L}$ .
- (6) On page 16, in the discussion of Alternative G-1, Limited Action, the remedy is described as long-term groundwater sampling and monitoring to assess whether or not COC concentrations are reducing in time via natural attenuation. As groundwater has been monitored for quite a number of years at both Study Areas 8 and 9, there should already be enough data to evaluate whether or not COC concentrations are reducing in time via natural attenuation. There should be enough data to plot trends in COC concentrations in order to estimate how much time would be necessary to meet PRGs.

- (7) On page 18, left column, fifth line down from top, please replace the word "effectives" with "effectiveness".
- (8) On page 21, left column, second paragraph, I understand where it says that because the treatment walls have already been installed, initial capital expenditures have already occurred. However, I do not understand how this affects future expected costs. Also, the Treatment Walls were installed specifically to address arsenic concentrations in groundwater at a time when the Department's GCTL and EPA's MCL for arsenic was 50 µg/L. The arsenic cleanup number has since dropped to 10 µg/L. One could make the argument that the Treatment Walls may need to be extended or new ones installed in order to meet the new cleanup number.

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

Sincerely,



David P. Grabka, P.G.  
Remedial Project Manager  
Federal Programs Section  
Bureau of Waste Cleanup

Cc: Teresa Grayson, Tetra Tech NUS, Oak Ridge, TN

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