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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW AND COMMENTS ON WORK PLAN ADDENDUM INTERIM SOURCE REMOVAL  
ACTION SOIL EXCAVATION AND REMOVAL AT AREA C SOUTHWEST NTC ORLANDO FL  
11/26/2013  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER  
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RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

November 26, 2013

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

RE: Work Plan Addendum, Interim Source Removal Action, Soil Excavation and Removal at Area C Southwest, Former Naval Training Center Orlando, Orlando, Florida

Dear Mr. Sanford:

I have completed my review of the Work Plan Addendum, Interim Source Removal Action, Soil Excavation and Removal at Area C Southwest, Former Naval Training Center Orlando, dated October 2013 (received by e-mail August 30, 2013), prepared by AGVIQ-CH2M HILL Constructors, Inc. Joint Venture III. I have the following comments on the Work Plan Addendum:

- (1) Section 2.1.5, Backfill and Site Restoration, states that the site is to be backfilled with clean fill and hydroseeded. In discussions with the City of Orlando, I believe their representatives indicated that they would prefer the site to be restored to a condition more suitable for its intended use as a park. I believe they also asked that topsoil be used to finish off the filling of the site. Please coordinate with City of Orlando representatives to ensure that the finished product, after soil excavation and site restoration has been completed, meets their requirements.
- (2) Section 2.1.5 also discusses wetland restoration, including possible requirements to replace excavated soils in the wetland with hydric soils and the planting of wetlands species. Please refer in this section to the Environmental Resource Permit, which will spell out the specific requirements for excavating soils in the wetland area and the requirements for site restoration in those areas.
- (3) Please provide a description of the methodology for which the soil excavations are based. For each area to be excavated (for example area R6A from Figure 2-3) please state whether all soils with benzo(a)pyrene concentrations above its residential soil cleanup target level of 0.1 mg/kg are to be excavated or whether a 95% UCL calculation was used to determine the limits of the excavation. Please then provide the calculated 95% UCL number and reference the worksheet used for the calculation located in Appendix A. Lastly, the worksheets for the 95% UCL calculation for every area that required such a calculation to be conducted should be located in Appendix A. The worksheets should

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reference for which areas the calculations were conducted and it should correspond to Figures 2-3 and 2-4.

- (4) Figure 2-5 does not indicate how the subsurface soil excavation boundaries were derived or show where subsurface soil samples were collected. The methodology used in deriving the subsurface soil excavation boundaries is also not explained in the text of the Work Plan.

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

Sincerely,



David P. Grabka, P.G.  
Remedial Project Manager  
DoD and Brownfields Partnerships  
Waste Cleanup Program

ec: Marianne Sweeney, AECOM, Orlando  
Amy Twitty, CH2M Hill, Pensacola

KAW 