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FINAL DECISION DOCUMENT FOR STUDY AREA (SA) 54 WITH TRANSMITTAL LETTER  
NTC ORLANDO FL  
05/01/2012  
TETRA TECH



June 29, 2012

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

Reference: CLEAN Contract No. N62470-08-D-1001  
Contract Task Order No. JM15

Subject: Final Decision Document for Study Area 54  
Naval Training Center, Orlando, Florida

Dear Mr. Sanford:

Please find enclosed the signed Final Decision Document for Study Area 54 at NTC Orlando for your use in hardcopy and CD formats. Copies have been distributed to the Orlando Partnering Team and the USAR as indicated below.

If you have any questions, please contact me at (865) 220-4701.

Sincerely,

A handwritten signature in blue ink that reads 'Teresa K. Grayson'.

Teresa K. Grayson  
Task Order Manager

Enclosure

c:  
Mr. David Grabka, FDEP  
Mr. Mark Davidson, BRAC PMO SE  
Mr. Tim Riordan, NAVFAC Atlantic  
Ms. Lidia S. Bonilla, USAR (2)  
File/470512001

**DECISION DOCUMENT**

**STUDY AREA 54**

**NAVAL TRAINING CENTER  
ORLANDO, FLORIDA**

**Contract No. N62470-08-D-1001  
Contract Task Order JM15**

**Prepared by:**

**Tetra Tech  
234 Mall Boulevard, Suite 260  
King of Prussia, Pennsylvania 19406**

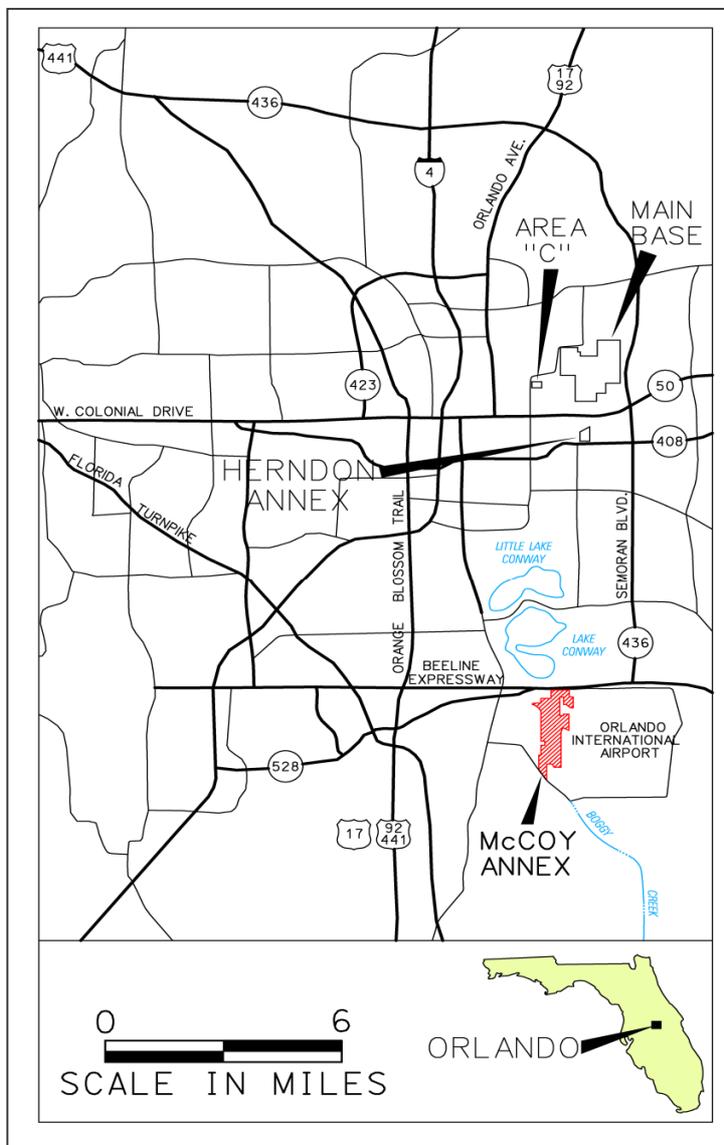
**Prepared for:**

**BRAC Program Management Office Southeast  
4130 Faber Place Drive  
North Charleston, South Carolina 29405**

**May 2012**

**Introduction**

An environmental investigation has been completed at Study Area (SA) 54 at the McCoy Annex of the former Naval Training Center (NTC), Orlando, Florida. The results of the investigation and the actions selected by the Orlando Partnering Team (OPT) to clean up environmental contamination associated with the site are described in this Final Decision. The OPT, which was assembled to address environmental issues at NTC Orlando, consists of representatives from the Navy and its contractors, the Florida Department of Environmental Protection (FDEP), and previously the U.S. Environmental Protection Agency (USEPA). SA 54 consists of two non-contiguous areas (western area and northeastern area), within a 20.391-acre parcel of land transferred on December 1, 1997 from the Navy to the U.S. Army Reserve (USAR) Command for non-residential use.



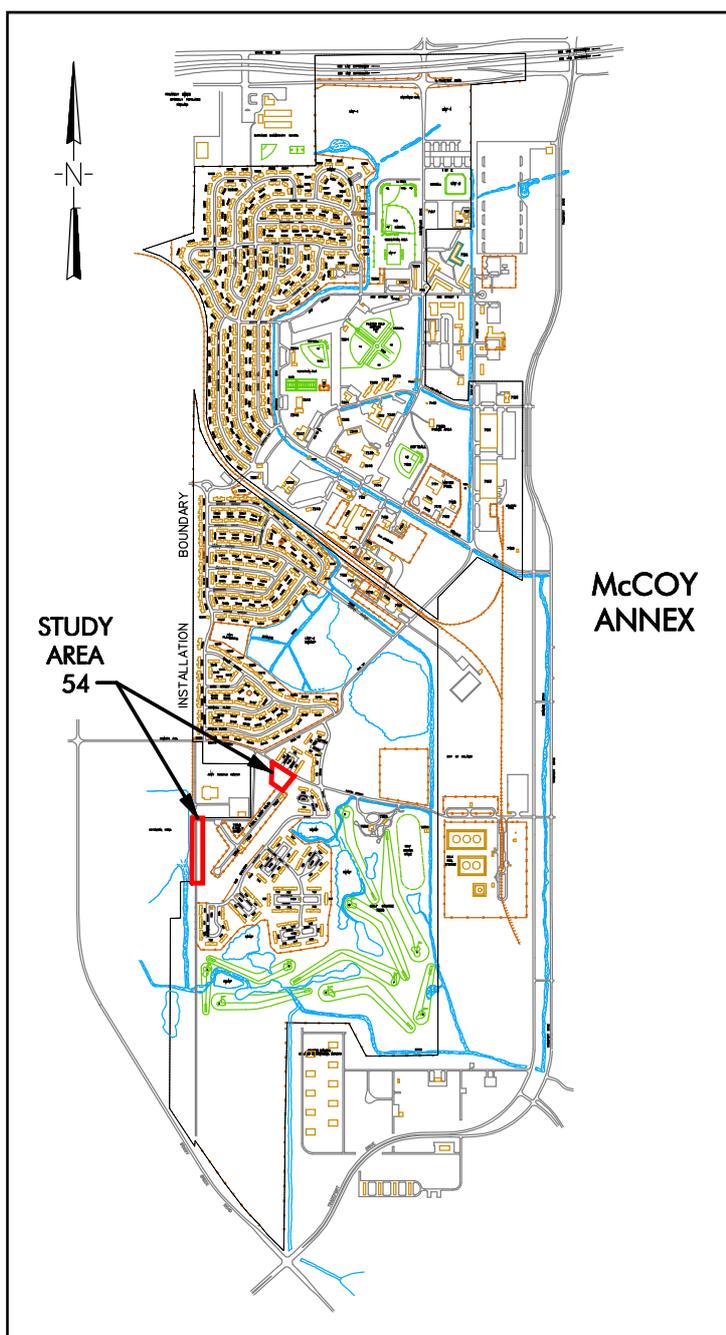
**Figure 1. McCoy Annex Location**

**Site Background**

McCoy Annex is one of four facilities that comprise NTC Orlando (Figure 1). The other three facilities are the Main Base, Area C, and Herndon Annex. McCoy Annex is located approximately 8 miles south of the Main Base and immediately west of the Orlando International Airport. The Beeline Expressway lies north of the Annex, and most development near the expressway consists of motels, restaurants, and other businesses related to air travel. The area west of McCoy Annex is zoned for industrial use but is sparsely developed. Undeveloped woodlands lie south of the Annex.

Prior to acquisition by the Army in 1941, McCoy Annex was undeveloped. From 1941 through 1973 it was used as an Army Air Force Base and as a municipal airport by the City of Orlando. The Navy acquired the property in 1973 although the City of Orlando retained title to the runways and large hangars formerly used by the Air Force and incorporated them into the Orlando International Airport. NTC Orlando was closed in April 1999 as part of the Defense Base Realignment and Closure (BRAC) Act of 1990.

SA 54 is located near the former Family Camp in the southwest portion of McCoy Annex (Figure 2). The Family Camp was once a small airstrip operated in the 1950s with an aircraft hangar and several other associated buildings. SA 54 is comprised of two small areas (western and northeastern) that surround surface sampling locations selected for the NTC background study (ABB-ES, 1995<sup>1</sup>). Since property transfer in December 1997, the U.S. Army has expanded their Reserve Center in the western portion of SA 54 with tree removal, regrading, stormwater control, and the construction of two buildings with an asphalt parking lot.



**Figure 2. Study Area 54 Site Location Map**

<sup>1</sup> ABB-ES (ABB Environmental Services, Inc.), 1995. *Background Sampling Report at the Naval Training Center in Orlando, Orange County, Florida.*

## **Investigation Summary**

**Site Screening.** Polynuclear aromatic hydrocarbons (PAHs) were identified at concentrations exceeding residential and industrial screening criteria in two locations originally sampled in October 1994 during the background sampling study. These locations were resampled in December 1996 to verify the initial results. Based on the confirmed PAH exceedances, a site screening investigation was conducted in 1997 and 1998. Soil sampling conducted as part of the site screening investigation employed a combination of semiquantitative immunoassay field tests and submission of selected soil samples from the northeastern and western areas to a laboratory. The results indicated that concentrations of PAHs in the soil exceeded both residential and industrial screening criteria in several sample locations at each of the two areas, but the extent of the contamination was not defined. The results of the site screening investigation are documented in the *Base Realignment and Closure Environmental Site Screening Report* (HLA, 1999<sup>2</sup>).

**Additional Site Investigation.** The objectives of the additional investigation at SA 54 were to delineate the extent of PAHs in the soil at concentrations exceeding screening criteria, investigate the potential leaching of PAHs to groundwater, and determine the volume of soil to be excavated and replaced to meet the requirements for nonresidential reuse. The subsequent site investigation began in September 1999 and continued in several phases through August 2001. The results of the investigation were documented in the *Site Investigation Report for Study Area 54, Naval Training Center, Orlando, Florida* (Tetra Tech NUS, Inc., May 2003).

**Extent of Soil Contamination.** Analytical results of samples collected from the western area indicated that PAH exceedances occurred adjacent to an unpaved road while samples collected away from the road did not exceed screening criteria. The OPT concluded that the PAH exceedances were due to vehicular traffic along the road, not past site activities; thus, further investigation and remediation of the western area was not required. Additional sampling at the northeastern area was conducted in April, June, and December 2000, and August 2001, until the limits of the contamination were determined.

To evaluate the variation of PAH contamination with depth, samples were collected at five depths ranging from 6 to 30 inches below ground surface at the two locations in the northeastern area with the highest PAH concentrations. Analyses showed PAH exceedances at all five sample depths at both locations. The highest concentrations were present in samples obtained from depths of 6 and 12 inches.

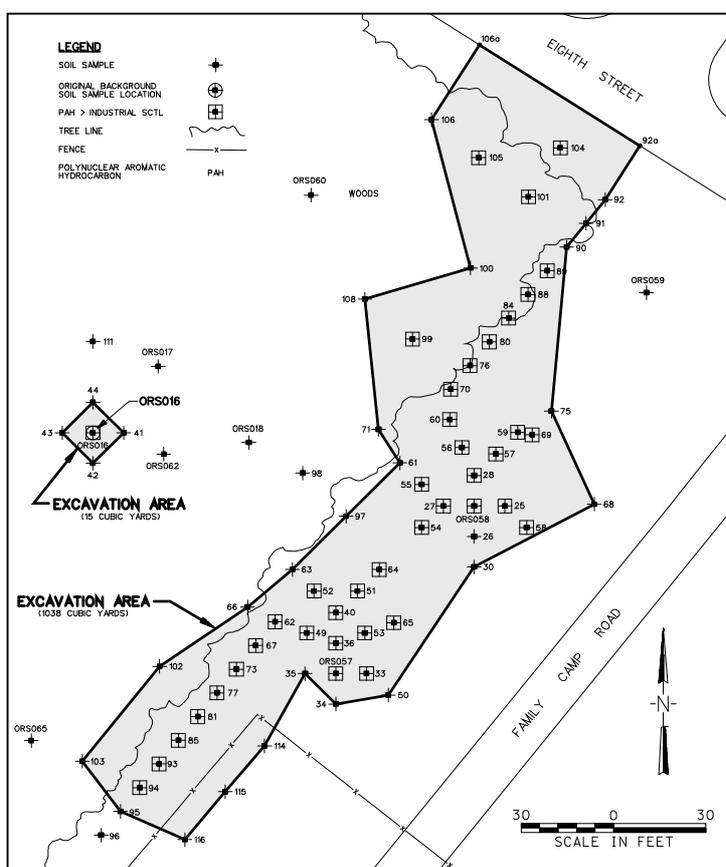
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<sup>2</sup> HLA (Harding Lawson Associates), 1999. *Base Realignment and Closure Environmental Site Screening Report, Study Area 54, Naval Training Center in Orlando, Orange County, Florida, August.*

**Potential Leaching of PAHs.** To evaluate the potential for leaching of PAHs from soil into the groundwater at SA 54, a temporary 2-inch well was installed in May 2001, at the location with the highest detected PAH concentrations in soil. A groundwater sample was collected from the temporary monitoring well, and a soil sample was collected at the same location. The samples were analyzed for PAHs, and the soil sample was subjected to the Synthetic Precipitation Leaching Procedure to determine the potential for leaching of PAHs. All parameters analyzed were below detection limits in the groundwater and leachate samples, with the exception of fluoranthene which was well below its Groundwater Cleanup Target Level. From these results, the OPT determined that leaching of PAHs from soil does not pose a significant risk to groundwater at SA 54.

### **Soil Removal**

In March and April 2002, CH2M Hill excavated two areas of contaminated surface soil in the northeastern portion of SA 54 where PAH concentrations exceeded the Florida commercial/industrial Soil Cleanup Target Levels (SCTLs). Areas with PAH concentrations in soil greater than the residential SCTLs but less than industrial SCTLs were not remediated. In addition, subsurface soil exhibiting PAH contaminant concentrations greater than commercial/industrial SCTLs was left in place. The approximate boundaries of the two excavation areas are shown in Figure 3. The soil was excavated to a depth of 2 feet and replaced with clean fill to remediate the contaminated areas. A total of approximately 1,086 tons of soil was removed and transported to a licensed disposal site. Details of the soil remediation are documented in the *Technical Memorandum, Summary of Soil Removal Activities and Results, Study Area 54, Naval Training Center Orlando, Florida* (CH2M Hill, 2002<sup>3</sup>).



**Figure 3. Study Area 54 Excavation Areas**

<sup>3</sup> CH2M Hill (CH2M Hill Constructors, Inc.), 2002. *Technical Memorandum, Summary of Soil Removal Activities and Results, Study Area 54, Naval Training Center Orlando, Florida*, December.

### **Current Conditions**

All soil removal is complete, and remaining PAH contamination will be left in place. SA 54 is currently federal property occupied by the USAR and is expected to remain so for the foreseeable future. Both the northeastern and western areas that comprise SA 54, where PAH contamination remains, are undeveloped, grassy parcels. The western zone also includes the now unused dirt roadway. All parties (Navy, USAR, and the FDEP) are aware of the soil contamination left in place and have signed a Memorandum of Agreement documenting this dated February 9, 2011. The signed Memorandum of Agreement is included as an attachment to this decision document.

### **Selected Remedy**

The remedy for contamination at SA 54 consists of institutional controls including restrictions prohibiting future residential use of the property. This remedy was selected because although concentrations of PAHs remaining in soil exceed the FDEP residential SCTLs, they do not present an unacceptable threat to human health or the environment allowing only future commercial or industrial uses at SA 54. The basis for the action to be taken is described below, and the institutional controls implemented at SA 54 are discussed further in the following section.

**Soil.** Land use shall be limited to nonresidential use for both the northeastern and western areas of SA 54 as shown on Figure 4, based on the following.

*Northeastern SA 54.* PAH contamination exceeding commercial/industrial SCTLs in the northeastern area was found in an area approximately 50 feet wide by 280 feet long which parallels Family Camp Road and in a small isolated area approximately 130 feet west of Family Camp Road. Contaminated soil was excavated to a depth of 2 feet and replaced with clean fill. Areas exhibiting PAHs at concentrations above residential SCTLs but below industrial SCTLs were not remediated. In addition, subsurface soil exhibiting PAH contaminant concentrations greater than commercial/industrial SCTLs was left in place.

*Western SA 54.* Site investigations documented PAHs in soil at concentrations greater than residential and industrial SCTLs. Soil removal was not performed in this zone because the OPT concluded that PAH contamination was due to vehicle traffic along the road, not the result of contaminant release, and that further investigation and remediation was not required.

**Groundwater.** No remediation is needed for groundwater. Contamination was not detected in groundwater at the study area, and the potential risk for leaching of PAHs into the groundwater is not significant.



Figure 4. Study Area 54 Site Boundaries

### **Institutional Controls**

SA 54 was transferred to the USAR in 1998. Institutional controls were finalized and documented in 2011 in the Memorandum of Agreement for Study Area 54 between the BRAC Program Management Office Southeast located in North Charleston, South Carolina for the Department of Navy (hereafter, Navy), the USAR, and FDEP. The goal of these institutional controls at SA 54 is to prevent unacceptable health risk from exposure to contaminated soil. Because soil contamination at SA 54 remains at concentrations that preclude unrestricted reuse; land use restrictions were implemented. These controls and restrictions consist of the following.

- Both the northeastern and western zones that comprise SA 54 are limited to non-residential use without prior written approval from the Navy and FDEP. Residential uses include, but are not limited to, residential, residential-like, and agricultural uses. Commercial or industrial uses of the zones are also prohibited if they expose workers to contaminated soils in excess of FDEP's worker exposure criteria. Uses incidental to an otherwise permissible commercial or industrial use that would cause exposure greater than the worker exposure criteria set forth by FDEP are prohibited.
- Activities, such as excavation, drilling, disturbance, or removal of soil, that expose workers to soils with contaminant concentrations greater than the applicable FDEP industrial SCTLs are prohibited unless prior written approval is obtained from the Navy and FDEP.
- Notice of contamination and LUCs are maintained with the property documentation at the 81<sup>st</sup> Regional Support Command Department of Public Works Headquarters, and a copy is kept at the facility in the Environmental Coordinator Office. In addition, warning signs are posted at the site in accordance with FDEP requirements to warn potential users that soil contamination is present.

LUCs will be maintained for as long as they are required to prevent unacceptable exposure to contaminated soil. The Navy will implement, maintain, monitor, and enforce the LUCs with the support and cooperation of the USAR. Although the Navy may transfer these procedural responsibilities to another party, the Navy shall retain ultimate responsibility for LUC enforcement, implementation, maintenance, and monitoring.

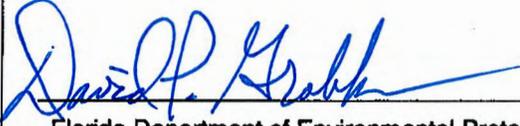
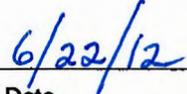
Should this land use restriction remedy fail, the Navy will ensure that appropriate actions are taken to reestablish its protectiveness and may initiate legal action to either compel action by a third party(ies) and/or to recover the Navy's costs for remedying any discovered land use restriction violation(s).

**Community Acceptance**

Community acceptance of the selected remedy for SA 54 was evaluated beginning in 1997 during meetings of the facility's Restoration Advisory Board (RAB). RAB meetings were open to the public and their bimonthly meetings were publicized in *The Orlando Sentinel*. The public was given an opportunity to comment during presentations that discussed remedial options and gave status updates for NTC sites, and during annual reviews of the BRAC Business Plan. Comments and questions from the RAB and the general public about the SA 54 remedy were addressed at the RAB meetings.

**Declaration**

Based on the administrative record compiled for this corrective action, the Navy has determined that the remedy selected for SA 54 is appropriate and protective of human health and the environment and complies with Federal and State regulatory requirements. The OPT concurs with the selected remedy.

STUDY AREA 54	
 _____ Florida Department of Environmental Protection	 _____ Date
 _____ U.S. Department of the Navy	 _____ Date

ATTACHMENT  
MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT  
BETWEEN  
BASE REALIGNMENT AND CLOSURE PROGRAM MANAGEMENT OFFICE  
SOUTHEAST FOR THE DEPARTMENT OF THE NAVY,  
UNITED STATES ARMY RESERVE,  
AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**I. AUTHORITY**

This Memorandum of Agreement (MOA) is entered into by the Base Realignment and Closure Program Management Office Southeast (hereinafter BRAC PMO SE) located in North Charleston, South Carolina for the Department of the Navy (hereinafter NAVY), Florida Department of Environmental Protection, (hereinafter FDEP) located in Tallahassee, Florida, and United States Army Reserve (hereinafter USAR) located at the former McCoy Annex in Orlando, Florida (collectively referred to as “the parties”). The purpose of this MOA is to implement land use restrictions for Study Area (SA) 54 to prevent unacceptable risks from exposure to contaminated soil, in order to protect human health and the environment. Although SA 54 is not on the National Priorities List (NPL), the environmental restoration is in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) (Title 42 United States Code Section [§] 9601, et seq.), and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (Title 40 Code of Federal Regulations [C.F.R.] Part 300).

**II. BACKGROUND**

Pursuant to CERCLA, 42 U.S.C. §9620, cleanup of hazardous substances that have been released into the environment must be accomplished to a degree that is determined to be protective of human health and the environment. Where the release has contaminated a piece of land, how that land is used, both at present and in the future, impacts the remedy selection decision and determines the degree of protectiveness required as well as the extent of remediation that is necessary. The remedy selection decision may also incorporate Land Use Controls (LUCs) that, when implemented, will ensure that land use remains consistent with the level of protectiveness and maintains the integrity of the remedy selected.

SA 54 consists of two non-contiguous Land Use Restriction Zones (western zone and northeastern zone), within a 20.391-acre parcel of land transferred on December 1, 1997 from the NAVY to the USAR Command. The attached site map (Figure 1) shows the boundaries of both zones of SA 54, as well as the boundary of the 20.391-acre parcel that was transferred to the USAR.

The results of investigations conducted from 1994 to 2001 identified polynuclear aromatic hydrocarbons (PAHs) in soil at concentrations greater than residential and industrial screening criteria in both the western and northeastern zones of SA 54. Analytical data are documented in the Site Investigation Report for SA 54, Naval Training Center (NTC), Orlando, Florida (Tetra Tech NUS, Inc., May 2003). PAH-contaminated soil was removed from the northeastern zone in 2002 to a depth of 2 feet and replaced with clean fill. Areas with PAHs concentrations in soil greater than residential Soil Cleanup Target Levels (SCTLs) but less than industrial SCTLs were not remediated. In addition, subsurface soil exhibiting PAH contaminant concentrations greater than commercial/industrial SCTLs was left in place. Details of this effort can be found in the Technical Memorandum, Summary of Soil Removal Activities and Results, SA 54, NTC Orlando, Florida (CH2M Hill, December 2002). As a result of the surface soil removal, the northeastern zone of SA 54 was deemed suitable for non-residential land use.

The western zone of SA 54 includes an unimproved roadway along the western edge of SA 54. Site investigations documented PAHs in soil at concentrations greater than residential and industrial SCTLs. Soil removal was not performed in this zone because the Orlando Partnering Team (OPT) concluded that PAH contamination was due to vehicle traffic along the road, not the result of contaminant release, and that further investigation and remediation was not required.

SA 54 is currently federal property occupied by the USAR and is expected to remain so for the foreseeable future. The two zones of SA 54 are undeveloped, grassy parcels. The western zone also includes the now unused dirt roadway.

The parties are aware of the soil contamination left in place.

### **III. DEFINITIONS**

“LUC” means any restriction or control on real property or water resources, arising from the need to protect human health or the environment, that limits the present or prospective use of, or exposure to, any portion of real property or water resources. LUCs may include institutional controls such as site plan and/or Master Plan notices or restrictions, prohibitive installation directives (e.g. forbidding excavation work or drilling of wells), as well as site-based engineered controls such as barriers, fences, guard posts, warning signs, etc.

LUC Assurance Plan or “LUCAP” means a written installation wide plan that sets forth the procedures that will assure that LUCs remain effective over the long-term for all areas where they are required.

LUC Implementation Plan or "LUCIP" means a written plan identifying the objective of each LUC, and identifies how each LUC will be implemented and maintained.

#### **IV. RESTRICTIONS**

To prevent unacceptable risks from exposure to contaminated soil at SA 54, LUCs will be implemented as follows:

- Use of the zones shall be limited to nonresidential uses without prior written approval from the BRAC PMO SE and FDEP. Residential uses include, but are not limited to, residential, residential-like, and agricultural uses. Commercial or industrial uses of the zones are also prohibited if they expose workers to contaminated soils in excess of FDEP's worker exposure criteria. Uses incidental to an otherwise permissible commercial or industrial use that would cause exposure greater than the worker exposure criteria set forth by FDEP are prohibited.
- Activities, such as excavation, drilling, disturbance, or removal of soil, that expose workers to soils with contaminant concentrations greater than the applicable FDEP industrial SCTLs are prohibited unless prior written approval is obtained from the BRAC PMO SE and FDEP.
- Notice of contamination and LUCs will be maintained with the property documentation. This Memorandum of Agreement and associated map will be kept at the 81<sup>st</sup> Regional Support Command Department of Public Works Headquarters, and a copy will be kept at the facility in the Environmental Coordinator Office. In addition, USAR will post signs at the restricted zones. In the western restricted zone, signs will be posted along the fence. In the eastern restricted zone, signs will be posted on the north, south, east, and west edges of the field. In accordance with FDEP requirements, these warning signs will be at least 2 feet by 2 feet, made of durable weather-resistant material, and have lettering in a color which highly contrasts with the sign background. Lettering will be a minimum of one inch high. Warning signs will be unobstructed and mounted so that the center of the sign is approximately 56 inches above ground surface. Signs will be visible from at least 75 feet away from access locations. Warning signs will warn of danger, prohibit entry of unauthorized persons, contain information on site conditions, and include a telephone number to call for more information.
- LUCs will be maintained for as long as they are required to prevent unacceptable exposure to contaminated soil. The BRAC PMO SE will implement, maintain, monitor, and enforce the LUCs with the support and cooperation of the USAR. Although BRAC PMO SE may transfer these procedural responsibilities to another party, the NAVY shall retain ultimate responsibility for LUC enforcement, implementation, maintenance, and monitoring.

**V. LUCAP & LUCIP REQUIREMENTS**

A. BRAC PMO SE will undertake the following actions:

(i) Effective as of the date of this MOA, a site-specific LUCIP for SA 54 will be included in the NTC Orlando LUCAP. The LUCIP will identify the restricted zones, the LUC objectives for each zone, and the particular controls and mechanisms that will be used to achieve each LUC objective.

(ii) BRAC PMO SE will request sufficient funds for LUC enforcement, implementation, maintenance, and monitoring in each annual budget allocation request.

(iii) BRAC PMO SE, unless otherwise specified, will coordinate annual inspections with the USAR, ensure that LUCs are monitored annually for compliance with the LUCIP, and promptly report any non-compliance to FDEP along with an explanation of corrective action taken.

(iv) BRAC PMO SE designates the following named employee as the point of contact for administering the LUCAP and monitoring, maintaining, and enforcing the LUCIP:

Mark E. Davidson  
BRAC Environmental Coordinator  
Base Realignment and Closure Program Management  
Office Southeast

B. The USAR will undertake the following actions:

(i) Except in emergency situations, the USAR will notify FDEP and BRAC PMO SE at least 60 days in advance of any changes in land use for SA 54. Each such notification will include: (a) an evaluation of the effect that the change in land use will have on risks to human health, the environment, and the effectiveness of the LUCs in the zones; (b) an evaluation of the need for any additional remedial action; and (c) if necessary, a proposal for any changes to the selected remedial actions.

(ii) The USAR will ensure that LUCs remain in compliance with the LUCIP and will participate in annual inspections and reporting as requested by BRAC PMO SE, unless otherwise specified.

(iii) The USAR designates the following named representative as the point of contact for all matters arising under the LUCIP:

Dan H. Thomas  
Environmental Branch Chief  
81<sup>st</sup> Regional Support Command  
Department of Public Works, Environmental Division

C. FDEP will undertake the following actions:

(i) FDEP will review the LUCIP and any other documents submitted by BRAC PMO SE in connection with the LUCIP within a reasonable time.

(ii) FDEP shall review any request for written approval submitted by the USAR to perform site activities that may temporarily compromise established LUCs and respond within a reasonable time.

(iii) FDEP agrees to provide oversight to ensure that site based LUCs are implemented, maintained, and remain protective of human health and the environment.

(iv) FDEP designates the following named representative as the point of contact for all matters arising under the LUCIP:

David P. Grabka  
Remedial Project Manager  
Florida Department of Environmental Protection

**VI. COVENANT OF AUTHORITY TO EXECUTE THIS AGREEMENT AND ANY MODIFICATION THERETO**

The signatories to this MOA covenant and warrant that they have authority to execute same. Any modification to this MOA shall be executed in writing and signed by an authorized representative of each party. Any modification that creates any additional commitment by BRAC PMO SE to this MOA must be signed by the original BRAC PMO SE signatory authority or successor, or a higher level BRAC PMO SE official possessing original or delegated authority.

**VII. TERM OF AGREEMENT AND RIGHT TO TERMINATION**

This MOA becomes effective on the date of the last signature of the parties and shall continue in effect until such time that the undersigned representatives or their successors terminate this MOA by mutual agreement. Alternatively, any party may unilaterally withdraw from and terminate this MOA for any reason upon 60 days written notice to the other parties, provided that should such termination result from a dispute, the terminating party shall first use its best efforts to resolve the dispute. Termination by the BRAC PMO SE or the USAR may trigger a reevaluation of the remedy for SA 54.

**VIII. ANTI-DEFICIENCY ACT**

Nothing in this MOA shall be construed as obligating BRAC PMO SE or USAR, their officers, employees, or agents to expend any funds in excess of appropriations authorized for such purposes in violation of the Anti-Deficiency Act, 31 U.S.C. §1341.

**IX. EXECUTION**

The parties do hereby execute this MOA by setting forth their signatures below:

For BRAC PMO Southeast



James E. Anderson  
Director  
BRAC Program Management Office Southeast  
North Charleston, South Carolina

4/11/11  
Date

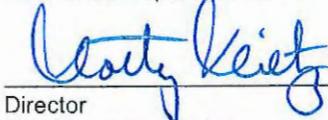
For United States Army Reserve



James P. Eggleston  
Chief of Staff  
81<sup>st</sup> Regional Support Command

2/10/11  
Date

For Florida Department of Environmental Protection



Director  
Division of Waste Management  
Florida Department of Environmental Protection  
Tallahassee, Florida

4/22/11  
Date



DRAWN BY S. PAXTON	DATE 08/18/10
CHECKED BY T. GRAYSON	DATE 08/20/10
REVISED BY	DATE
SCALE AS NOTED	



**SITE MAP**  
**TAFT US ARMY RESERVE CENTER - FAC ID FL023**  
**STUDY AREA 54**  
**NAVAL TRAINING CENTER**  
**ORLANDO, FLORIDA**

CONTRACT NUMBER CTO 0125	
APPROVED BY	DATE
APPROVED BY	DATE
FIGURE NO. FIGURE 1	REV 0