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LETTER REGARDING REGULATOR REVIEW AND COMMENTS FOR DRAFT PROPOSED  
PLAN, OPERABLE UNIT 1 (OU 1) NTC ORLANDO FL  
4/24/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

09.1.01.0004

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Lawton Chiles  
Governor

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

Virginia B. Wren  
Secretary

April 24, 1997

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

RE: Draft Proposed Plan, Operable Unit (OU) 1, NTC Orlando.

Dear Mr. Hansel:

I have completed the technical review of the above referenced document dated April 1997 (received April 4, 1997) and provide the following comments. Also, please note the attached memorandum from Greg Brown, P.E.

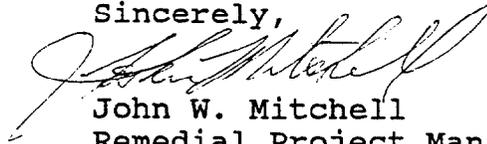
1. On page 1, in the Public Meeting Box, it indicates the public comment period as starting on May 14 while on pages 2 and 10 the document indicates a start date of May 15. Please correct accordingly.
2. On page 5, under the section RI Findings, the last paragraph should indicate that the soil cover sufficiently protects human health and the environment through the restrictive use of the property for recreational use only.
3. On page 6, in the third paragraph under the section Characterize the Risks, delete the phrase "very small cancer risk" and state that a cancer risk could exist for humans if they resided on the site. Also, the fourth paragraph needs to be rewritten to reflect that based on the proposed reuse of the property (recreational), that risk greater than 1 in a million should not exist and that the property will be restricted to this usage.
4. Related to Section 4.0, subsection Groundwater Monitoring, I discussed with Greg Brown the wells he proposed for monitoring in his memorandum. We agree that only two additional well clusters (OLD-U1-13A; OLD-U1-14B; OLD-U1-15C; and OLD-U1-19A; OLD-U1-20B; OLD-U1-21C) need to be included in the groundwater monitoring program.

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5. Under Section 5.0, the fourth bullet should also indicate that land use will be restricted to recreational use.

If I can be of any further assistance with this matter, please contact me at (904) 921-9989.

Sincerely,



John W. Mitchell  
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando  
Barbara Nwokike, Navy SouthDiv  
Oscar "Mac" McNeil, Bechtel  
Nancy Rodriguez, USEPA Region 4  
Steve McCoy, Brown and Root, Oak Ridge  
Bill Bostwick, FDEP Central District  
John Kaiser, ABB, Orlando  
Patricia Kingcade, OGC/Trustee File

TJB B

JJC JJC

ESN ESN

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**TO:** John Mitchell, Remedial Project Manager, Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section <sup>B</sup>

**FROM:** Greg Brown, P.E., Professional Engineer II, <sup>AB..</sup>  
Technical Review Section

**DATE:** April 15, 1997

**SUBJECT:** Draft Proposed Plan, Operable Unit 1, Naval Training Center Orlando, FL.

I reviewed the subject document dated April 1997 (received April 4, 1997). I agree with the general conclusions and recommendations reported in the document. It is adequate for its intent. I have a question, however, about the choice of wells for long-term monitoring. I do not have detailed data for groundwater hydrology or extent of contamination. The document implies that groundwater contamination is limited to the landfill extent. Proposed monitoring wells appear to be in narrow proximity to each other about 500 feet downgradient from the landfill boundary near the transfer parcel boundary.

I suggest that closer well clusters be considered. Specifically, I recommend: 09C, 08B, & 07A; 15C, 14B, & 13A; 21C, 20B, & 17A; and 24C, 23B, & 22A. Their proximate locations to the landfill will detect contamination migration before it passes the transfer parcel boundary. Additionally, these clusters cover the full downgradient portions of the landfill. This configuration is less vulnerable to monitoring errors caused by seasonal or long-term groundwater flow variations. These suggestions are based on the limited hydrology data presented in the proposed plan and are made for your casual consideration. If you have any questions, call me at (904) 488-3935.