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LETTER REGARDING REGULATOR REVIEW AND COMMENTS REGARDING DRAFT
RECORD OF DECISION OPERABLE UNIT 1 (OU 1) NTC ORLANDO FL
6/12/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

09.01.01.0008
00541

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherel
Secretary

June 12, 1997

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

RE: Draft Record of Decision, Operable Unit (OU) 1, NTC
Orlando.

Dear Mr. Hansel:

I have completed the technical review of the above referenced document dated May 1997 (received May 28, 1997) and provide the following comments.

1. Section 1.0 (Introduction) should not be a section, but should be the "Declaration of the Record of Decision."
2. In the second paragraph of the Statement of Basis and Purpose of the Declaration on page 1-1, change "restrict the residential use of the land" to "restrict the land to industrial or recreational use (non-residential)."
3. On page 1-2 of the Declaration, under the subsection Institutional Controls, change the third bullet to read "restrict use of the area of the landfill to industry and recreation only."

Also on this page, the signatory of the Declaration should only be the Navy representative.

4. In the last paragraph of Section 2.7.1 (HHRA) on page 2-13, change the word "prohibit" to "restrict."
5. In Section 2.8.1 (Groundwater Monitoring) on page 2-18, decisions points related to the sampling frequency need to be better defined other than using the term "appreciable changes" or "appreciable increases." Any changes related to the monitoring and sampling program should be determined based on specific increases or decreases of the contaminant(s) of concern (e.g., gross

Mr. Wayne Hansel
June 17, 1997
Draft OU 1 ROD
Page 2

alpha; gross beta) which exceed drinking water standards and background.

6. In Section 2.8.3 (Institutional Controls) on page 2-21, I recommend the following:
 - a. In the second sentence of the second paragraph, it should indicate that these chemicals are likely mobilized from the native soils rather than coming from the landfill.
 - b. In the second bullet, change the word "prohibited" to "restricted."
 - c. In the third bullet, delete the phrase "however, the levels at OU 1 are within the range of detected levels in uncontaminated aquifers.....etc." to end of sentence. Also, change the next to last sentence to read: "Because of these concentrations, the surficial groundwater above the Hawthorn formation and within approximately 600 feet of the landfill boundary should not be used for consumption or irrigation.
 - d. In the fourth bullet, change "may contain" to "contains." Also, incorporate the last sentence of this section into the fourth bullet. It should read: "Due to these concerns, the area within the landfill boundary will be restricted to industrial or recreational use."
 - e. The last sentence of this section should read: "The property transfer documents and recorded deed will include the above restricted covenants."

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