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LETTER REGARDING LOCAL REDEVELOPMENT AUTHORITY'S CONCERNS REGARDING  
INSTITUTIONAL CONTROLS AS PART OF THE RECORD OF DECISION FOR OPERABLE  
UNIT 1 (OU 1) NTC ORLANDO FL  
6/13/1997  
CITY OF ORLANDO



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## City of Orlando

**OFFICE OF THE MAYOR**  
400 SOUTH ORANGE AVENUE  
ORLANDO, FLORIDA 32801-3302

NAVAL TRAINING CENTER  
COMMUNITY REDEVELOPMENT AGENCY

(407) 246-3093  
FAX (407) 246-3164

June 13, 1997

Lieutenant Robert S. Mehal  
Public Affairs Officer  
Naval Training Center  
4551 Kitty Hawk Street  
Orlando, FL 32813-8360

Dear Lieutenant Mehal:

The City of Orlando, as the Local Redevelopment Authority, is concerned about the institutional controls proposed as part of the Record of Decision (ROD) for Operable Unit 1, the North Grinder Landfill. We are particularly concerned about the boundary for the proposed Groundwater Use Restriction Area. The boundary appears excessive, and not based on scientific data.

First, let me point out that the CRA is not opposed to the Groundwater Use Restriction Zone in concept. Since the inception of planning for NTC reuse, it has always been clear that in addition to use restrictions on the landfill itself, a buffer zone around the landfill would have to be established to ensure that any nearby residential development is at a safe distance. It is also clear that the scientific rationale for such a buffer zone rests in the potential for groundwater contamination from the landfill itself.

However, until the publication of the Proposed Plan for Operable Unit 1, on May 22, 1997, the true nature and extent of such a buffer zone were not known. Upon reviewing the Proposed Plan, it is our opinion that any Groundwater Use Restriction Area boundary included in the ROD, will permanently establish the "safe distance" from the landfill required for residential development and many other potential uses of the site. The area will contain a deed restriction, which must be passed to any future home buyers, which will serve as a clear warning of the potential for landfill-related groundwater contamination. Such a deed restriction surely will render residential development infeasible within this area.

Because of the impact of this Groundwater Use Restriction Area, we believe it is critical that the boundary established in the ROD be based on clear scientific evidence of landfill-related groundwater contamination. Such evidence is not presented in the Proposed Plan for Operable

Lieutenant Robert S. Mehal

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Unit 1, and the Groundwater Use Restriction Area boundary shown in Figure 2 of the plan appears to be an arbitrary rectangle. Furthermore, because the groundwater flow direction in the vicinity of the landfill is from the southwest, it seems unsupportable for the boundary to extend as far south of the landfill as it does north and northeast of the landfill.

The CRA asks that the NTC environmental team re-evaluate the proposed Groundwater Use Restriction Area boundary, and present a revised boundary for public comment prior to the adoption of the ROD for Operable Unit 1. To assist in this re-evaluation, the CRA submits for your consideration Exhibit 1, which we recommend as an appropriate revised boundary. Please note that all existing and proposed monitoring wells and piezometers are included within our recommended boundary.

Thank you for this opportunity to comment on the Proposed Plan for Operable Unit 1. If I can be of any further assistance in this matter, please do not hesitate to call me at 407-246-3093.

Sincerely,

*K. Brooks*  
*for*

Debra A. Braga  
Assistant Director/Special Counsel

Attachment

xc: Thomas R. Kohler  
Tom Lothrop  
CAPT Gregg Southgate  
CAPT Doug Yesensky  
LT Gary Whipple  
Wayne Hansel  
Bruce Hossfield  
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# EXHIBIT 1

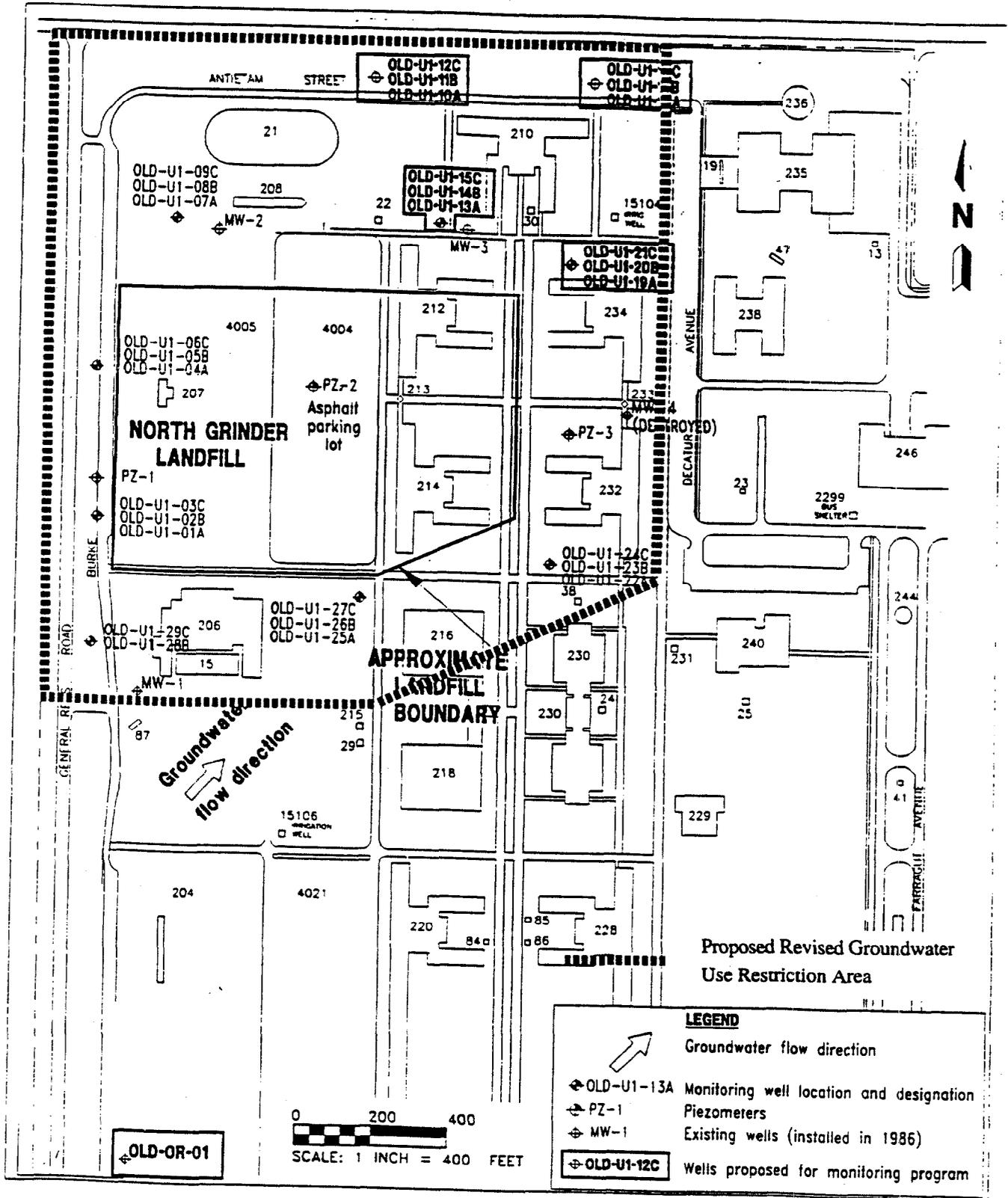


Figure 3: Existing Monitoring Wells and Monitoring Well Locations for the groundwater Sampling Program