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EMAIL REGARDING REGULATORY REVIEW AND COMMENTS ON REMEDIAL INVESTIGATION WORK PLAN AT OPERABLE UNIT 4 (OU 4) NTC ORLANDO FL
9/25/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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From: John Mitchell TAL 850/488-3935
To: Steve McCoy; WAYNE HANSEL; NANCY RODRIGUEZ; JOHN KAISER; Gary Whipple; BOB COHOSE; BARBARA NWOKIKE; MARK SALVETTI
Subject: OU 4 RI Work Plan
Date: Thursday, September 25, 1997 5:06PM

Following are my OU 4 RI WORKPLAN COMMENTS

1. On page 2-15 (2nd par.) it states there are no published surface water quality standards for cis-DCE or VC. The standard is they must meet minimum criteria, which in this case is the detection limit.

2. Last paragraph page 2-23, change northwest to northeast.

3. Page 3-10 (third bullet on page), see comment No. 1.

4. Page 3-14 (2nd full par.), no matter the current conditions at the site, the groundwater is still classified as G-II and is therefore potentially potable and must be considered as such. It is also usable for irrigation.

5. Page 3-21, the 2nd par. states the CPCs are organic at the site. Antimony is also a CPC at the eastern portion of the site.

6. Figure 4-1. I suggest a microwell be installed near the SE corner of Building 1066.

7. Figure 4-2, I suggest additional surface soil samples be taken in SA 14, and an additional sample be taken in SA 12 midway between wells OLD12-01A and 13A.

8. Page 4-13 (1st par.) indicates a 6-foot screen for the microwell. They should be 9 feet (3/3-ft sections).

9. Page 6-2 (last bullet), shows potential exposure from irrigation. This is a G-11 aquifer and must be evaluated for potable use.

10. Page 6-3 (1st par.), DEP is not opposed to ABB running Central Tendency, but the state only accepts RME; not CT.

11. Page 6-7: It states that ERA Assessment and Measurement Endpoints will be listed in the ERA and examples are provided. These endpoints must be determined now to determine what and if any toxicity tests will need to be performed as part of the RI. The first 2 bullet examples are acceptable as assessment endpoints. However the 3rd bullet is too general. It should be growth and survival of benthic macroinvertebrates and fish. The use of literature derived measurement endpoints may or may not be adequate. We may need to perform actual laboratory or in situ bio-assays/toxicity tests.

12. Page 6-9: Selection of ERA EPCs should also use Florida Surface Water Quality Standards and Federal Ambient Water Quality Criteria.

13. Page 6-13: Again, literature derived measurements may be adequate, but the possible need for toxicity testing (terrestrial and aquatic) may be necessary.

14. Tables A-1 and A-2 (pages A-1 - A-3): Surface and subsurface soil also need to be screened against the states leachability SCGs which should be included in the tables.