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NTC ORLANDO  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON TECHNICAL  
MEMORANDUM FOCUSED RISK ASSESSMENT STUDY AREA 23 NTC ORLANDO FL  
7/10/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of  
Environmental Protection

09.01.23.0001

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Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 10, 1998

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

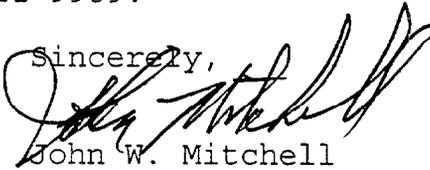
Re: Technical Memorandum, Focused Risk Assessment: SA 23  
Surface Soil, NTC Orlando.

Dear Mr. Hansel:

I have completed the technical review of the above referenced document dated May 18, 1998 (received May 26, 1998). Please address the comments in the attached memorandum from David Grabka.

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  
Nancy Rodriguez, USEPA Region 4  
Richard Allen, ABB, Jacksonville  
Steve McCoy, Brown and Root, Oak Ridge  
Bob Cohose, Bechtel  
Bill Bostwick, FDEP Central District

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# Memorandum

# Florida Department of Environmental Protection

**TO:** John Mitchell, E.S. III, Remedial Project Manager

**THROUGH:** Tim Bahr, P.G. Supervisor, Technical Review Section *TB*

**FROM:** David P. Grabka, E.S. I, Technical Review Section *DPG*

**DATE:** June 9, 1998

**SUBJECT:** Technical Memorandum, Focused Risk Assessment: SA 23 Surface Soil, NTC Orlando, Florida, May 18, 1998

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I have completed my review of the Technical Memorandum for the Focused Risk Assessment of Study Area 23 Surface Soil. I have the following comments that should be addressed:

- (1) Chapter 62-785, Florida Administrative Code, Soil Cleanup Target Levels (SCTLs) should have been used for screening for Chemicals of Potential Concern (CPCs) instead of the Soil Cleanup Goals (SCGs) for Florida, dated January 19, 1996. These SCTLs represent the Department's latest calculated risk-based cleanup numbers.
- (2) Screening against the SCTLs would add copper and vanadium to the list of CPCs. The revised residential cleanup numbers for both copper and vanadium are based upon acute toxicity considerations for a small child during a one time soil pica event. These SCTLs are applicable for both the current recreational scenario (ball park) or a future residential scenario.
- (3) As inorganics were analyzed for only in one sample (23S00501), it is unknown if there are unacceptable risks associated with inorganics in surface soil at other locations within the study area. I feel surface soil should be sampled and analyzed for inorganics to determine its extent.
- (4) Unacceptable risks for Polynuclear Aromatic Hydrocarbons in surface soil appear to be confined to the 23S00501 area. Removal of soil from this area appears warranted. However, it may be prudent to delay remedial activities until the extent of soils contaminated by inorganics (arsenic, copper, vanadium) has been delineated.
- (5) The Department does not accept risk based on central tendency (CT) in making remedial decisions. Remediation of the site should reduce risks to  $1 \times 10^{-6}$  based on reasonable maximum exposure (RME) for the selected land use scenario.