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LETTER REGARDING REGULATORY REVIEW COMMENTS ON INTERIM REMEDIAL
ACTION FOR STUDY AREAS 17, 18, 23, 35, 37, 40, 42 AND OPERABLE UNIT 3 (OU 3) AND
OPERABLE UNIT 4 (OU 4) NTC ORLANDO FL

4/20/1999

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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

David B. Struhs
Secretary

April 20, 1999

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

RE: Interim Remedial Action for SA 17, 18, 23, 35, 37, 40, 42 & OU3 and OU4, Naval Training Center & McCoy Annex, Orlando, FL

Dear Mr. Hansel:

I have completed my review of the Interim Remedial Action Workplan for SA 17, 18, 23, 35, 37, 40, 42 & OU3 and OU4, Naval Training Center & McCoy Annex, dated April 8, 1999 (received April 12, 1999) prepared and submitted by the Environmental Detachment Charleston. I concur with the proposed actions, including the removal of PAH and arsenic contaminated soils from SA 40 for use as cover material on the McCoy Annex landfill. Concentrations of arsenic and PAHs in the excavated material from SA 40 should meet industrial soil cleanup target levels (SCTLs) and may meet residential SCTLs after inadvertent mixing during the excavation process. I do have the following comments concerning the work plan:

(1) The second figure in Section A incorrectly shows the area to be excavated. The area to be excavated is within the dashed area, not the hatched area. The text of the report correctly states the area to be excavated.

(2) The work plan objective for SA 40 should not be to excavate and dispose of soil contaminated with PAHs at concentrations greater than 100 micrograms per kilogram. This is overly conservative. Rather the objective should be to excavate all soil contaminated with PAHs and arsenic at concentrations exceeding their residential SCTLs or reference concentrations.

(3) For OU3 SA 8, I do not understand why samples will be taken from each side wall and tested for pesticide at Sample Point 08S035. This location is shown as only containing arsenic.

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IRA Workplan
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Also, the excavation area about this point is not described in the work plan implementation section.

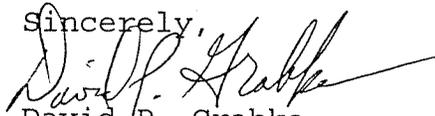
(4) The first figure in Section H does not show the correct area of excavation. The hatched areas about 08S044 and 08S025 are correct for the excavation of pesticide contaminated soil. However, as is stated in the text, the area within the fence line is to be excavated.

(5) The area to be investigated inside the fence at OU3 SA 8 contaminated with arsenic would not appear to be characteristically hazardous based upon total arsenic concentrations. However, it is the Navy's responsibility to determine whether that waste is hazardous. It may be necessary to conduct TCLP testing upon the excavated material prior to a landfill's acceptance of the material.

(6) While the date and concentrations used are correct, the residential and industrial screening values are SCTLs, not SCGs as is stated in the workplan.

If I can be of any further assistance with this matter, please contact me at (850)488-3693.

Sincerely,


David P. Grabka
Remedial Project Manager

cc: Lt. Gary Whipple, NTC Orlando
Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge
Robin Manning, Bechtel, Knoxville
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