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LETTER REGARDING FINAL DRAFT SITE SCREENING REPORT FOR SITE 18 NTC ORLANDO FL
7/16/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Jeb Bush
Governor

Department of Environmental Protec

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

David B. Struhs
Secretary

July 16, 1999

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

RE: Final Draft, Base Realignment And Closure, Environmental Site Screening Report, Study Area 18, Naval Training Center, Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the Final Draft BRAC Environmental Site Screening Report for Study Area 18, Naval Training Center, Orlando, dated June 1999 (received June 28, 1999). I have the following comments that should be addressed in the final report:

(1) The report should include groundwater elevation measurements and the consultant's interpretation of groundwater flow direction.

(2) On Figure 3, the correct units in the chem-box for soil sample 18S01100 should be µg/kg for the results for arochlor-1260 and benzo(a)pyrene and mg/kg for beryllium. The units specified in the chem-box are for a groundwater sample.

(3) The residential SCTL for beryllium is 120 mg/kg. Section 1.3.1.1 incorrectly states that beryllium was detected in soil at a concentration that exceeded the residential SCTL.

(4) In Section 1.3.2, the industrial SCTL for benzo(a)pyrene is 500 µg/kg.

(5) In Section 1.4.1, the last part of the section should read, "Therefore, the soil medium no longer poses risks that exceed State or Federal risk target levels for industrial use. However, as contaminants are to be left in place at concentrations exceeding residential SCTLs, land use controls will be necessary to ensure that residential development is not allowed on the property unless further remedial actions are undertaken." As this property is slated to be transferred in the future to the Greater Orlando Aviation Authority (GOAA) for transportation and

multimodal purposes, cleanup to industrial use criteria is appropriate.

(6) I do not concur with the statement that there have been no known site activities that may have contributed to exceedances of secondary standards for aluminum and iron. In Section 1.1, it was stated that a building on site had been previously used for battery maintenance. Discharges of sulfuric acid from batteries at other sites in the state have caused exceedances of aluminum and iron due to the dissolution of aluminum and iron naturally present in soils. However, as battery maintenance activities were only associated with Building 7179 and iron and aluminum exceedances in groundwater were distributed across the site, it is unlikely, but nevertheless possible, that concentrations of aluminum and iron in groundwater were the result of site activities.

(6) I concur with the consultant's recommendation that further delineation and evaluation of contaminants in groundwater will be necessary. The groundwater elevation measurements requested in comment (1) should help in the placement of monitoring wells.

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: Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
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