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LETTER REGARDING REGULATOR REVIEW AND COMMENTS FOR DRAFT AND FINAL WORK PLAN FOR GROUNDWATER SAMPLING OPERABLE UNIT 2 (OU 2) NTC ORLANDO FL

4/2/2002

U S EPA REGION IV

00509
08.01.02.0005

April 2, 2002

4WD-FFB

Ms. Barbara Nwokike
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
Charleston, SC 29419-9010

SUBJ: Draft and Final Work Plan for Groundwater Sampling, Operable Unit 2, Former Naval Training Center Orlando, Orlando, Florida, February 2002.

Dear Ms. Nwokike:

The United States Environmental Protection Agency (EPA) has completed its review of the subject documents.

GENERAL COMMENTS

1. **With the exception of the suggestions listed below for dealing with historically high turbidity wells, this Work Plan is acceptable for its intended purpose.**

2. **Our reviewer has some specific experience with the occurrence of higher turbidity wells in the west ramp area of the McCoy Annex. During the drilling of wells and soil borings in this area, very fine grained layers with high percentages of organic matter were often encountered. This is not surprising if one reviews old topographic maps which show this general area as one of a swampy low lands. Additionally, the high organic soils are often visible in the construction activities around the Orlando Airport.**

   In order to improve the chances for success, it is recommended that the procedure for selection of sand pack and well screen slot size, found in Section 6.6.4 of the EPA Environmental Investigations Standard Operating Procedures and Quality Assurance Manual, November 2001, be followed. This document is available on the web at http://www.epa.gov/region4/sesd/eisopqam/eisopqam.html. The use of dual stage sand pack wells with the use of pre-packed well screens is recommended in this document as providing a better chance of success in excessively fine-grained settings. Even after the evaluation of the grain size of the native materials and the selection of the finest well construction materials generally available (slot size 0.006 inches and size 100 sand pack),

some wells still had high enough turbidity as to call into question the occurrence of false positives for inorganic and some pesticide and PCB compounds.

If you have any questions, please call me at (404) 562-8544.

Sincerely,

Gregory D. Fraley
Senior Remedial Project Manager

cc:
David Grabka, FDEP