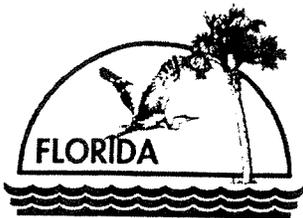


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LETTER REGARDING REGULATORY REVIEW AND NONCONCURRENCE ON SOURCE
REMOVAL FOR BUILDING 109 NTC ORLANDO FL
4/14/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 14, 2003

David Twedell
Nodarse & Associates, Inc.
1030 North Orlando Avenue
Suite A
Winter Park, Florida 32789

RE: Source Removal Report, Building 109, Former Orlando Naval
Training Center, Orange County, Florida, FDEP ID No.
488841262

Dear Mr. Twedell:

I have completed my review of the Source Removal Report, Building 109, Former Orlando Naval Training Center, dated February 4, 2003 (received February 5, 2003), prepared and submitted by Nodarse & Associates, Inc. This report describes the excavation and treatment of 2,257 tons of petroleum contaminated soil and the pumping, treatment and discharging of 2.95 million gallons of petroleum contaminated groundwater at Building 109, former Orlando Naval Training Center. This work was conducted in accordance with the Revised Source Removal/Interim Measures Plan approved by the Department on August 2, 2002. The Source Removal Report requests that the facility be considered for No Further Action status. While I commend Nodarse & Associates for the aggressive work to remove petroleum contamination at this site, the Department cannot concur with the request for No Further Action at this time for some reasons that will be explained below.

Although not stated in the text of the report, I infer that groundwater extraction was discontinued on or about September 30, 2002 based upon RA - Table 3 in the Appendices of the report, as that was the last date for which influent/effluent contaminant analyses on the groundwater treatment system were reported. On that date, contaminated groundwater that significantly exceeded the Department's groundwater cleanup target levels (GCTLs) was still being extracted, thus indicating that contaminated groundwater still existed beneath the site. While analyses of groundwater samples collected from temporary extraction wells RW-1, RW-3 and RW-5 would indicate that the site has been cleaned up

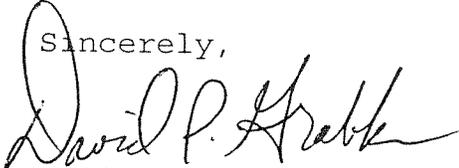
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. David Twedell
April 14, 2003
Source Removal Report
Building 109
Former Naval Training Center, Orlando
Page 2

and No Further Action required, these wells were all shallow wells that intersected the water table. I suspect that the contaminants detected in the extracted groundwater, at least those detected near the end of the pumping, were being pulled from deeper within the surficial aquifer. That there are vertical downward gradients that can induce contaminant migration deeper within the surficial aquifer has been indicated by studies conducted at Study Area 36, NTC Orlando, located immediately to the east of this site.

While I would ordinarily require that Nodarse & Associates install vertical extent wells at Building 109 to determine whether whether deeper sections of the surfical aquifer had been impacted, the Navy's CLEAN contractor, Tetra Tech NUS Inc., has already submitted a draft work plan for Study Area 36 that does just that. Tetra Tech's work plan involves the collection of groundwater samples from deeper within the surficial aquifer using a DPT rig (later to confirmed by installing monitoring wells), some of those samples to be collected in the Building 109 area recently excavated and pumped by Nodarse & Associates. This work plan was required to investigate the source of benzene detected in some deep wells upgradient of Study Area 36. I suspect that the benzene detected in those Study Area 36 wells may have migrated from the Building 109 site. If that turns out to be the case, Nodarse has apparently eliminated the source of groundwater contamination detected at Study Area 36 and has also contributed to the reduction of groundwater contamination located at both Building 109 and Study Area 36. If the work conducted by Tetra Tech determines that groundwater deeper within the surficial aquifer beneath the Building 109 site has not been adversely impacted so as to exceed the Department's GCTLs, the site will be reevaluated to determine whether No Further Action status is acceptable.

If I can be of any further assistance with this matter, please contact me at (850)245-8997.

Sincerely,

David P. Grabka, P.G.
Remedial Project Manager

Mr. David Twedell
April 14, 2003
Source Removal Report
Building 109
Former Naval Training Center, Orlando
Page 3

cc: Barbara Nwokike, Navy SouthDiv
Greg Fraley, USEPA Region 4
Steve McCoy, Tetra Tech NUS, Oak Ridge
Bill Bostwick, FDEP Central District

TJB

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