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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FOURTH QUARTER  
2004 GROUNDWATER SAMPLING FOR STUDY AREA 36 NW NTC ORLANDO FL  
5/6/2005  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

JED BUSH  
Governor

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

Colleen M. Castille  
Secretary

May 6, 2005

Commanding Officer  
Attn: Barbara Nwokike, RPM  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Fourth Quarter 2004, Groundwater Sampling - Study Area 36 NW  
- Main Base, Naval Training Center, Orlando, Florida

Dear Mrs. Nwokike:

I have reviewed the Fourth Quarter 2004, Groundwater Sampling - Study Area 36 NW - Main Base, Naval Training Center, dated April 2005 (received April 14, 2005), prepared by Terraine, Inc. I have the following comments on the report:

- (1) Effective April 17, 2005, the groundwater cleanup target levels (GCTLs) in Chapter 62-777, Florida Administrative Code, have changed. For the contaminants detected on this site, the relevant changes are that the GCTL for naphthalene has changed from 20 µg/L to 14 µg/L and the GCTL for methyl tert-butyl ether has changed from 50 µg/L to 20 µg/L.
- (2) In the Evaluation of Natural Attenuation in Section 3.3, it says that the December 2004 groundwater results for Study Area 36NW indicate potential for biodegradation due to (1) negative Oxygen Reduction Potential (ORP) which is indicative of reducing conditions, (2) low nitrate levels which indicate that nitrate reduction should not interfere with reductive dechlorination and (3) hydrogen levels greater than 1 nM/L which indicate that reductive dechlorination is possible. These observations are not supportive of biological degradation of the petroleum compounds detected in groundwater at this site. Rather, they would support the argument for the reductive dechlorination of the trichlorethene detected in groundwater at Study Area 36, which is located somewhat downgradient of this site.

*"More Protection, Less Process."*

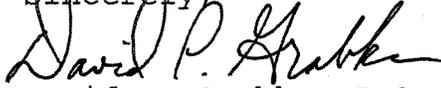
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Mrs. Barbara Nwokike  
Naval Training Center, Orlando  
May 6, 2005  
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- (3) I concur that quarterly groundwater monitoring should continue until a final remedy is selected for this site.

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

cc: Greg Fraley, EPA Region 4  
Steve Tsangaris, CH2M Hill, Tampa  
Steve McCoy, Tetra Tech NUS, Oak Ridge  
Jim Young, Terraine

JJC



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