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LETTER REGARDING REGULATORY COMMENTS ON SITE INVESTIGATION FOR STUDY
AREA 2 NTC ORLANDO FL
11/10/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

JEB BUSH
Governor

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

Colleen M. Castille
Secretary

November 10, 2005

Mrs. Barbara Nwokike
Code ES33
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Site Investigation Report for Study Area 2, Former Naval
Training Center Orlando, Orlando, Florida

Dear Mrs. Nwokike:

I have completed my review of the Site Investigation Report for Study Area 2, Former Naval Training Center Orlando, dated October 2005 (received October 31, 2005), prepared and submitted by Tetra Tech NUS, Inc. The report adequately describes the recent investigations of groundwater contamination associated with Study Area 2. The report also adequately demonstrates that contamination, primarily perchloroethylene, is migrating onto Herndon Annex from the Orlando Executive Airport property to the south of Herndon Annex. I also concur with the following recommendations:

- (1) Continue ongoing groundwater monitoring to include key well locations within Herndon Annex, south of the annex on Orlando Executive Airport property and within the Azalea Park neighborhood,
- (2) Begin monitoring surface water in the drainage ditch along the eastern side of Herndon Annex and along the shore of Lake Barton,
- (3) Establish a Temporary Point(s) of Compliance in the Azalea Park neighborhood,
- (4) Conduct the approved full-scale Interim Remedial Action groundwater remediation using PHOSTer®,
- (5) Establish temporary Groundwater Use Restriction Institutional Controls to prevent use of groundwater beneath Herndon Annex until remedial actions have restored the surficial aquifer to meet GCTLs, and

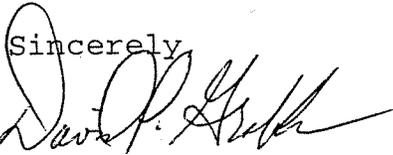
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- (6) Conduct a risk assessment to establish alternate GCTLs that are protective of human health (current and future site users and downgradient users beyond institutional control boundary) and the environment (drainage ditch and Lake Barton).

It is proposed that upon successful completion of the above that the Navy would submit a request for a Risk Management Option Level II No Further Action with institutional controls for the site. I cannot at this point commit to the Department agreeing with No Further Action with institutional controls upon completing the above tasks, mainly because of the off-site contamination both upgradient and downgradient of the site. However, as conditions change, I am not prepared to completely rule it out.

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: Tom Lubozynski, FDEP Central District
Greg Fraley, USEPA Region 4
Steve McCoy, Tetra Tech NUS, Oak Ridge TN
Steve Tsangaris, CH2M Hill, Tampa

JJC



ESN

