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LETTER REGARDING REGULATOR REVIEW AND COMMENTS TO RECOMMENDATIONS
FOR GEOTECHNICAL EXPLORATION FOR INDUSTRIAL DEVELOPMENTS 177 ACRE
FORMER NTC ORLANDO TRADEPORT SUITE OPERABLE UNIT 2 (OU 2) NTC ORLANDO

FL

8/10/2009

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 10, 2009

BRAC PMO SE
Attn: Mr. Art Sanford
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Recommendations for Geotechnical Exploration for Industrial Developments,
177-Acre Former NTC Orlando Tradeport Site, Operable Unit 2, Orlando, Florida

Dear Mr. Sanford:

I have completed my review of the Recommendations for Geotechnical Exploration for Industrial Developments, 177-Acre Former NTC Orlando Tradeport Site, Operable Unit 2, dated April 24, 2009 (received April 27, 2009), prepared and submitted by HSA Golden on behalf of Bogey Boggy Creek 08, LLC. As general guidelines for the geotechnical exploration of the property for potential use as an industrial site, the proposed work appears unremarkable and should be approvable. However, I have some minor points I would like to raise:

- (1) There is no explanation regarding the disposition of any buried landfill wastes that might be removed during the course of the investigation. If the waste removed is not regulated hazardous waste, I believe these wastes may be returned from whence they came and at least two feet of cover reappplied. However, if waste removed is hazardous waste, that waste may not be reburied on the site and must be handled and disposed in accordance with all regulations appropriate to that waste.
- (2) On page 4 of proposal, it says that personal protective equipment Level D is planned to be needed. As Operable Unit 2 was a landfill that was closed prior to regulations that would limit the type of wastes the landfill could receive, it is unknown what type of materials might be uncovered. The Navy might require that all site workers adhere to regulations for hazardous waste site workers (29 CFR 1910) during this exploration. This would be similar to what is required for excavation and construction work that would reach a depth below 12 inches within the landfill boundary of the Operable Unit 1 site, North Grinder landfill, located on the former Main Base.

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- (3) HSA Golden should be reminded that monitoring wells and remediation systems are not to be damaged or destroyed.
- (4) There should be communication between HSA Golden and the Navy regarding scheduled work periods to prevent the landowners contractor(s) and the Navy's contractors from interfering with each other's work.
- (5) The Navy should ask that the results of the proposed exploration be communicated to the Navy. These results may be used in determining whether a proposed development project on the property is acceptable to the Navy and is protective of human health and the environment.
- (6) Decontamination should be conducted between borings to prevent cross-contamination.

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: Art Sanford, BRAC PMO Southeast
Tom Lubozynski, FDEP Central District
Greg Fraley, EPA Region 4
Teresa Grayson, Tetra Tech, Oak Ridge
Sam Naik, CH2M Hill, Atlanta

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