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NTC ORLANDO
5090.3a

COMPLETION REPORT FOR OPERABLE UNIT 2 (OU 2) NTC ORLANDO FL

BECHTEL

0107 - 017077
File NTC ORLANDO
7457

18.02.02.0001
ID 00436

MAR 3 2000

Commanding Officer
Department of the Navy Southern Division
Naval Facilities Engineering Command
Attention: Mr. Barbara Nwokike 1873
2155 Eagle Drive, P. O. Box 190010
North Charleston, SC 29419-9010

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
DO#0107, COMPLETION REPORT FOR SITE OU2 McCOY ANNEX, NAVAL TRAINING CENTER, ORLANDO, FL.
Subject Code: 1250

Dear Ms. Nwokike:

This letter serves as the Completion Report for the Response Action performed under Delivery Order 0107, at the Naval Training Center (NTC), McCoy Annex, Orlando, Florida. As agreed previously, the Completion Report is provided as a condensed version in a letter format because many of the components of the typical Completion Report are contained in the Remedial Work Plan (RWP) already submitted. Also, the letter format meets the intent of the Technical Direction Memorandum by Mr. Herron dated July 21, 1999, to minimize the submittals necessary to satisfy the Delivery Order closeout report requirements.

This letter provides an executive summary and identifies those submitted documents containing the site background, regulatory setting, and description of the work performed. Construction schedule, cost summary, and waste disposal are addressed in the text of the letter. Included as attachments are:

1. Time Critical Removal Action Memorandum (TCRAM),
2. Borrow material analytical results
3. As-built drawing
4. Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP)
5. Gopher Tortoise Relocation Permit,
6. Local permit compliance correspondence
7. Wetland designation reports, and
8. Job photographs.

The Department of the Navy, Naval Facilities Engineering Command, Southern Division (SOUTHDIV), issued Delivery Order 0107, for Remedial Action at Site OU2, McCoy Annex, Naval Training Center, Orlando, Florida, to Bechtel Environmental, Inc (BECHTEL). The Delivery Order entailed two tasks for the Site OU2, Task A - Hot Spot Removal and Task B - Water Management. Site OU2 is a former landfill, located at the southern end of McCoy Annex underneath and adjacent to an existing nine hole golf course.

Task A was a Removal Action (RA) with two objectives:

- To place a two (2) foot soil cover over the portion of the former landfill site indicated in the RI as having insufficient cover over the waste.

- To remove polynuclear aromatic hydrocarbons (PAH) contaminated soil from sample location areas S91 and S103, located on McCoy Annex Golf Course, north the fairways for Hole No.3 and Hole No. 7, respectively.

Task B was to contain and treat groundwater having chlorinated solvents and other volatile organic compounds such as benzene and xylene in excess of Florida maximum contamination levels. Task B work was deleted and funds deobligated by Delivery Order Modification No. 04.

Site characterization data from the *Remedial Investigation Technical Memorandum for Operable Unit 2, McCoy Annex Landfill,* Brown and Root Environmental, March 1998 and the Draft *Remedial Investigation Report for Operable Unit 2, McCoy Annex Landfill, Naval Training Center, Orlando Florida,* Tetra Tech NUS, January 1999, (RI) was used in establishing the scope of Task A. With the RI report still in its "draft" stage, SOUTHDIV directed the approach to the RA be developed jointly by BECHTEL and Tetra Tech NUS (formerly Brown and Root Environmental) and concurrence obtained from the Orlando Partnering Team (OPT). To facilitate the timely execution of the RA, BECHTEL prepared a TCRAM in addition to the RWP. The TCRAM is provided as Attachment 1.

The RWP for Task A contains a Site Background and Regulatory Setting and a description of the work to be performed. The RA was performed in accordance with Revision 1 to the RWP with the exception of the source of the landfill soil cover. The landfill soil cover was to have been made up of soil material from:

- NTC Study Area 40,
- NTC Main Base Golf Course,
- McCoy Annex sample location areas S91 and S103, and
- Borrow material to make-up any deficiencies in soil quantity.

SOUTHDIV determined that the NTC Study Area 40 material was unsuitable and therefore not available for use. The NTC Main Base Golf Course material was not available during the construction period due to litigation and therefore was not used. 2000 cubic yards of soil was excavated from McCoy Annex sample location areas S91 and S103 and used as soil cover over sample locations G28 and G29 on the landfill. The material excavated from sample location areas S91 and S103 was spread to a maximum one foot thick layer and subsequently covered with one foot of "clean" borrow material, per directions from SOUTHDIV and the OPT. "Clean" borrow material was procured to complete the 2 foot soil cover over the landfill extending beneath the fairway for Hole No. 4. A total of 13,212 cubic yards of soil and topsoil was purchased from Material Placement Corp. (MPC) for use as soil cover on the landfill and backfill at sample location areas S91 and S103. The borrow material was sampled and analyzed to certify the material as "clean." The analytical data is provided in Attachment 2.

Construction activities began April 15, 1999 with a preconstruction meeting. Shortly afterward, the Study Area 40 material was deemed unsuitable. At this point Bechtel began the purchase of soil from MPC. Construction mobilization included Tetra Tech NUS surveyors staking the northern boundary of the landfill where additional soil cover was planned, and the corners for sample location areas S91 and S103 where PAH removal was planned. BECHTEL performed the RA using direct hire forces for the soil excavation and placement, tree stump grubbing, access road construction and turf restoration. A subcontract was issued for timber harvesting, clearing and chipping to JCM Timber.

Work was completed at sample location areas S91 and S103, however on July 8, 1999 work stopped on the landfill cover due to litigation which prevented use of soil from the NTC Main Base Golf Course. At this point approximately 2 of the 24 acres of landfill cover had been completed. BECHTEL anticipated the halt was

temporary and that work would resume when the litigation was resolved. A temporary orange plastic snow fence was erected along the south side of the fairway for Hole 4 atop the completed 2 foot soil cover. In September, 1999, Delivery Order Modification No. 05 was issued to stop work on the landfill cover and deobligate remaining funds. No civil survey was made of the installed portion of the landfill soil cover, however the Tetra Tech NUS drawing has been marked to show the approximate location of the snow fence on the completed portion and is provided as an "as-built" in Attachment 3.

The budget for the Delivery Order was $2,424,924 plus fee and the actual cost at completion was $503,309 plus fee. A cost summary by Task and phases of work performed is provided below:

Task A, Hot Spot Removal and Soil Cover*

Work Description by Phase	Budget Cost	Actual Cost
Preconstruction Phase (Technical Review, Cost estimates, RWP)	$94,670	$84,442
Construction Phase (Material and Subcontract Procurements, and Construction)	1,544,825*	418,867
*Delivery Order Modification No. 05 deleted a portion of the scope and deobligated $1,150,000		

Task B, Water Management *

Work Description by Phase	Budget Cost	Actual Cost
Preconstruction and Construction Phase (Technical Review, Cost estimates, RWP Material and Subcontract Procurements, System Construction and Start-up)	$665,093	$0
Operation and Maintenance Phase (System O&M and reporting for 12 months)	120,336	0
* Delivery Order Modification No. 04 deleted this scope and deobligated $785, 429.		

Cost savings were realized on each phase of the Delivery Order. BECHTEL recognized a value in the timber stand on the landfill area during the site visit and subcontracted with a timber harvestor to market the timber stand and clear the undergrowth. This action avoided $30,000 in disposal costs for cleared material plus provided $1,700 revenue to SOUTHDIV Forestry Department. BECHTEL utilized surplus materials and BECHTEL HAZWOPER qualified labor from NAS Jacksonville to expedite PAH removal and construction of the soil cover and haul road, saving SOUTHDIV $2,000 as compared to local hires and purchases. BECHTEL's procurement process obtained a competitive price of $3.52 per cubic yard for borrow material which saved $42,000 in material costs during the construction phase. Other cost savings came from cooperation with the McCoy Annex Golf Course facility manager, allowing BECHTEL access to the work areas with minimal restrictions, while keeping the golf course fully operational. Additionally, the NTC caretaker allowed BECHTEL to use closed housing at the McCoy Annex for a field office. The McCoy Annex Golf Course was not required to shut down due to BECHTEL operations.

To implement the Delivery Order the following actions were taken to comply with federal, state and local regulatory and or permit requirements:

- A TCRAM was written to allow RA to start before a final decision was made on the remedial approach. A copy is provided in Attachment 1.
- A Notice of Intent (NOI) for a storm water permit was submitted to EPA Region IV along with a letter explaining the NOI was being submitted as a CERCLA "permitting equivalency" package. The NOI was submitted as a cost and time saving measure. To be compliant with the NPDES storm water permit, a SWPPP was written and maintenance records were kept at the site during the construction period and subsequently forwarded to SOUTHDIV for continued maintenance. A copy of the SWPPP was submitted to the City of Orlando Engineer. The response from City of Orlando Engineer is included in Attachment 4 with the NOI and SWPPP.
- A permit was obtained from the Central Regional State of Florida Game and Fresh Water Fish Commission (FGFWFC) for the relocation of Gopher Tortoises, a special concern species in Florida. Gopher Tortoise burrows were identified and protected within the proposed landfill soil cover area. BECHTEL sent a summary of the field activities that were taken to comply with the Gopher Tortoise Relocation Permit to the FGFWFC. A copy is included in Attachment 5 with the permit.
- Communications were conducted with the City of Orlando Engineer to comply with the City requirements for a driveway entrance installed onto Boggy Creek Road. Correspondence and sketches are provided in the Attachment 6.
- Wetlands were delineated by Tetra Tech NUS and silt fencing was erected by BECHTEL to protect the wetland during construction activities. A report of the wetland survey prepared by Tetra Tech NUS is included in the Attachment 7. A clarification that the land in the area designated as Area B on the RWP drawings is not a wetland was provided by the Florida Department of Environmental Protection. A copy of the correspondence is included in Attachment 7.

A potential source of the elevated PAH readings at sample location area S103 was discovered when asphalt pavement was uncovered during the excavation at the sample location area. Approximately 24 cubic yards of asphalt paving material was segregated from the excavated soil material which was being placed as the landfill soil cover on the fairway for Hole No. 4. The asphalt material was hauled off-site to Central Florida Crushers an asphalt recycler. Tree stumps, limbs and underbrush from the clearing and grubbing activity were chipped into mulch and spread over the landfill. All construction debris and solid waste resulting from construction activities were noncontaminated and disposed offsite as sanitary waste.

The Delivery Order was executed in a safe manner without incident or accident to personnel or the environment. Real-time air monitoring performed during the grubbing operation on the landfill did not detect the presence of methane or other organic vapors.

Job photographs are provided in Attachment 8.

References in this letter were made to the following documents:

Remedial Investigation Technical Memorandum for Operable Unit 2, McCoy Annex Landfill, Brown and Root Environmental, March 1998

Draft Remedial Investigation Report for Operable Unit 2, McCoy Annex Landfill, Naval Training Center, Orlando Florida, Tetra Tech NUS, January 1999,

Remedial Work Plan, Revision 1, McCoy Annex Landfill Cover, Naval Training Center, McCoy Annex, Orlando, Florida, Bechtel Environmental, Inc., April 1999.

If you have any questions, please call Bill Hevrdeys, at (865) 220-2534, or me, at (865) 220-2745.

Sincerely,

O. N. McNeil, Jr., P.E.
Program Manager

ONM:weh:Lr1998

Attachments:
1. Time Critical Removal Action Memorandum
2. Borrow Material Analytical Data
3. As-Built Drawing
4. Notice of Intent and Storm Water Pollution Prevention Plan
5. Gopher Tortoise Relocation Permit
6. Boggy Creek Driveway Entrance Correspondence
7. Wetland Correspondence
8. Job Photographs

cc: M. Herron w/o att.
S. McCoy w/ att

ATTACHMENT 1

TIME CRITICAL REMOVAL ACTION MEMORANDUM

BUILDING A CENTURY
1898 BECHTEL 1998

APR 29 1999

Commanding Officer
Naval Training Center Orlando
Attention: Lt. Whipple
Caretaker Site Office
1850 John Paul Jones Avenue, Building 2016
Orlando, FL 32803

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
DO # 0107 – SUBMITTAL OF TIME CRITICAL REMOVAL ACTION MEMORANDUM FOR MCCOY ANNEX LANDFILL COVER AT NAVAL TRAINING CENTER ORLANDO, FLORIDA
Site/Subject Codes: 7440/5320

Dear Lt. Whipple:

Enclosed is the *Time Critical Removal Action Memorandum for the McCoy Annex Landfill at Naval Training Center Orlando, Florida*, April 1999. This document requires your signature as well as that of the Commanding Officer. We are requesting the document be approved without changes if possible. Also, would you please return to us a copy of the completed signature page.

A copy of this decision document must be placed in the CERCLA Administrative Record for NTC Orlando by June 18,1999, which is within 60 days of field mobilization.

If you have any questions, please contact me at (423) 220-2406, or Bill Hevrdeys at (407) 251-0890 (Bechtel's Orlando field office).

Sincerely,

J. R. Manning, P.E.
Project Engineer

RA:ch:Lr1813

Enclosure: As stated

cc: N. Rodriguez, EPA
W. Hansel, SDiv
B. Nwokike, SDiv
D. Grabka, FDEP

[redacted]

Naval Training Station Orlando

Time-Critical Removal Action for McCoy Annex Landfill

Naval Training Station Orlando

TIME-CRITICAL REMOVAL ACTION MEMORANDUM

April 1999

Naval Training Station Orlando

Time Critical Removal Action for McCoy Annex Landfill

TIME-CRITICAL REMOVAL ACTION MEMORANDUM

Prepared for:

Department of the Navy
Naval Training Station Orlando
Orlando, Florida

Prepared by:

Bechtel Environmental, Inc.
151 Lafayette Drive
Oak Ridge, Tennessee 37830

Contract No. N62467-93-D-0936
Job No. 22567

April 1999

Prepared J. R. Mann for R.J. Cohose — Bechtel Project Manager — 4/29/99 Date

Reviewed _____ Lt. Gary Whipple, Public Works Department — _____ Date

Approved _____ Commanding Officer, NTC Orlando — _____ Date

CONTENTS

ACRONYMS AND INITIALISMS

ARAR	applicable or relevant and appropriate requirements
Bechtel	Bechtel Environmental, Inc.
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
IRP	Installation Restoration Program
FDEP	Florida Department of Environmental Protection
NCP	National Contingency Plan
PAH	polyaromatic hydrocarbon
RCRA	Resource Conservation and Recovery Act
RAWP	Removal Action Work Plan
SARA	Superfund Amendments and Reauthorization Act
SCTL	Soil Cleanup Target Level
SVOC	semi-volatile organic compounds
TCRAM	Time-Critical Removal Action Memorandum
TPH	total petroleum hydrocarbons
VOC	volatile organic compounds

1.0 PURPOSE

This Time-Critical Removal Action Memorandum (TCRAM) documents the decision to perform a time-critical removal action for the McCoy Annex Landfill at Naval Training Center (NTC) Orlando, Orlando, Florida.

Environmental response actions are conducted at NTC Orlando under the Department of Defense Installation Restoration Program (IRP). This time-critical removal action is being conducted under the guidance of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. {See EPA (U.S. Environmental Protection Agency), 1990. *Superfund Removal Procedures Action Memorandum Guidance.* EPA/540/P-90/004.]

With the passage of SARA, all remedial investigation/feasibility study activities atNTC Orlando have been conducted in accordance with applicable U.S. Environmental Protection Agency (EPA) guidance.

A Removal Action Work Plan (RAWP) has been prepared by Bechtel Environmental, Inc. (Bechtel) to perform a time-critical removal action at the McCoy Annex Landfill [part of Operable Unit (OU) 2] to cover a portion a part of the former NTC ORlando landfill, The RAWP identifies the method and scope for the landfill cover activities. Bechtel has been contracted by the Southern Division, Naval Facilities Engineering Command, as the removal action contractor for NTC Orlando under Prime Contract No. N62467-93-D-0936, to perform this task.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 SITE DESCRIPTION

2.1.1 Physical Location

NTC Orlando is located in the City of Orlando, Florida. The base includes four discrete facilities—the Main Base, Area C, Herndon Annex, and McCoy Annex. McCoy Annex, which includes OU-2, encompasses approximately 877 acres and is located approximately 8 miles south of the Main Base, west of the Orlando International Airport. The McCoy Annex Landfill is an inactive landfill covering approximately 99 acres. The site is now covered in second growth forest expect in the golf course area.

2.1.2 Site Background

The McCoy Annex landfill, designated OU-2, is located at the southern end of McCoy Annex, under and adjacent to a 9-hole golf course owned by the Navy and operated by the City of Orlando. A Remedial Investigation (RI) has been completed at the landfill. See the Draft *Remedial Investigation Report for Operable Unit 2, McCoy Annex Landfill, Naval Training Center, Orlando, Florida,* Tetra Tech NUS, January 1999. Also, information on the nature and extent of polyaromatic hydrocarbon (PAH) contamination is found in the *Remedial Investigation Technical Memorandum for Operable Unit 2, McCoy Annex Landfill*, Brown and Root, March 1998.

2.1.3 Site Characteristics

Historically, waste materials from construction projects, industrial and maintenance shops, and other base activities were disposed in the landfill. The landfill has a cover that ranges from 1 ft. to 2.5 ft. thick and greater.

2.2 RELEASE OR THREATENED RELEASE INTO THE ENVIRONMENT OF A HAZARDOUS SUBSTANCE, POLLUTANT, OR CONTAMINANT

Tetra Tech NUS, Inc., has performed a RI on the landfill. The RI revealed that contamination exists above the State of Florida Cleanup Target Levels for semivolatile organic compounds (SVOCs), pesticides, total petroleum hydrocarbons (TPHs), and arsenic in surface soil. Volatile organic compounds (VOCs), SVOCs, inorganics, gross alpha, and gross beta exceedances were detected in groundwater. In sediment, pesticides and gross alpha contamination exists.

The existing soil cover in the western and southern areas of OU-2 is contaminated with SVOCs at concentrations above State of Florida screening levels. Over much of the golf course, the soil cover is contaminated with arsenic above screening levels. Pesticides and TPHs were found above screening criteria in two samples. The gross alpha and beta values that were mentioned above may be due to naturally occurring elevated background levels.

The organic and inorganic groundwater contaminants found were above the State of Florida screening criteria in the surficial aquifer and in the upper sand unit of the underlying Hawthorne group. VOCs and metals are the most significant types of contaminants. The area that is most impacted with organic chemicals is in the eastern part of the wooded area south of the golf course. Metals were found above screening criteria in many samples distributed over much of OU-2.

Surface water in, adjacent to, and downstream of OU-2 contains organic and inorganic contaminants above State of Florida screening criteria. Metals were found above the screening criteria in many of the samples distributed over the OU. Sediment samples contained pesticides above the State of Florida screening criteria.

2.3 OTHER ACTIONS TO DATE

2.3.1 Previous Actions

Soil cover was installed over waste placed in the landfill during the life of the landfill. As mentioned previously, the site has undergone a RI under CERCLA.

2.3.2 Current Actions

A time-critical removal action has been planned to cover the landfill with 2 ft of fill and excavate two areas on the adjacent golf course that have PAH contamination exceeding Florida Soil Cleanup Target Levels (SCTLs) for residential use. These two areas are located north of fairways 4 and 7 on the golf course.

2.4 STATE AND LOCAL AUTHORITIES ROLES

The Navy is the lead agency for removal actions. The Navy is funding and overseeing the removal action proposed in this TCRAM. EPA Region IV and the Florida Department of Environmental Protection (FDEP) concur with the decision to conduct a time-critical removal action and will be provided copies of this TCRAM, as well as the RAWP, to review.

3.0 THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

This section provides an overview of potential risk associated with the existing cover, or lack thereof, to the environment. As noted in Section 2.2, groundwater in the vicinity of the landfill is contaminated above State of Florida screening criteria. The landfill may be a continuing source of the groundwater contamination in the area.

Since the landfill may be a source of contamination in groundwater immediately downgradient, and groundwater sampling data shows exceedances above the State of Florida SCTLs, the time-critical removal action for this site is justified.

3.1 PRELIMINARY REMEDIATION GOALS

This time-critical removal can best be described as a source removal action. Cover placement in the field will be guided by the results of investigative surveys to determine the boundaries of the landfill.

After soil cover placement is complete, the site will be graded to final contours.

EPA Region IV and FDEP have not established specific applicable or relevant and appropriate requirements (ARARs) for additional cover operations for closed landfills. Erosion and sediment control requirements, and similar ARARs have been incorporated in the RAWP for the action.

3.2 REMOVAL ACTION OBJECTIVES

The objective of this time-critical removal action is to place an additional 2 ft of soil on top of the McCoy Annex landfill, which may be a source of groundwater contamination. This will achieve the objective of minimizing impacts to groundwater and help prevent further degradation of the environment. The time-critical removal action will also remediate two areas of PAH contamination.

The proposed action will contribute to the efficient performance of long-term remedial actions with respect to the release. Future plans for these sites include completing the CERCLA cleanup process. Groundwater contamination will be addressed as part of future CERCLA documentation for this site.

4.0 ENDANGERMENT EVALUATION

Actual or threatened releases of hazardous substances, pollutants, and contaminants from these sites, if not addressed by implementing the response actions selected in this TCRAM, may present an imminent and substantial endangerment to public health, welfare, or the environment as discussed in Section 3.0. Additionally, because NTC Orlando and McCoy Annex were scheduled for closure and turnover in the October 1998, security measures have been significantly reduced or eliminated. Consequently, access to the public is not strictly controlled, and potential human health hazards will be increased because of the likelihood of direct exposure of future workers to site contaminants.

5.0 PROPOSED ACTIONS AND ESTIMATED COSTS

5.1 PROPOSED ACTIONS

5.1.1 Proposed Removal Action Description

The objective of this action is to place a soil cover layer over portions of the former landfill site to ensure a minimum 2-ft thickness of soil cover above the waste. Clean fill will be placed over an area of approximately 21 acres within the 35-acre site. Prior to placement of soil cover, the entire are will be cleared and grubbed. No special soil conditioning or compaction equipment will be required. Soil will be compacted to a relative density of 85 percent. Soil will be trucked to the site from an offsite borrow source. In addition, soil excavated from the two areas of PAH contamination on the golf course will be used as cover soil.

Trees and brush that cannot be sold as pulpwood will be chipped and stockpiled onsite for use during site restoration. Erosion and silt management methods will consist of silt fencing around the site perimeter and staked hay bales or similar features to protect drainways. A stormwater discharge permit will be obtained for the areas disturbed by the landfill cover portion of the project.

Site restoration work will include seeding, fertilizing, and mulching all disturbed areas. Chipped wood debris will also be spread in such a manner as to allow natural decomposition.

5.1.2 Contributions to Remedial Performance

This time-critical removal action will minimize continuing sources of contamination for surface and subsurface soil, groundwater, and surface water. Any remaining soil and/or groundwater contamination will be addressed at a later date through the CERCLA process.

5.1.3 Description of Alternative Technologies

There is no practical alternative to covering the landfill with clean fill.

5.1.4 Applicable or Relevant and Appropriate Requirements

The National Contingency Plan (NCP) requires that removal actions pursuant to CERCLA Section 106 attain ARARs under federal or state environmental laws or facility citing laws to the extent practicable considering the urgency of the situation and the scope of the removal. Applicable requirements are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site. Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal or state law that, while not "applicable" to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations sufficiently similar to those encountered at the site that their use is well suited to the particular site. Other requirements to be considered, including advisories and guidance issued by the state or federal government, should be identified and used to confirm protection of human health and the environment if there are no specific ARARs for a chemical or site conditions or if ARARs are not deemed sufficiently protective. Other requirements to be considered do not have the status of potential ARARs because they are non-

promulgated and are not legally binding. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be ARARs.

Major federal and state environmental laws that are appropriate for a time-critical removal action evaluation have been reviewed and ARARs incorporated into the work plan, which will be provided to FDEP and EPA Region IV.

5.1.5 Project Schedule

This time-critical removal action is scheduled to begin in April 1999. It is anticipated that no more than 3 or 4 months will be necessary to complete the removal of the suspect areas in the field. No planned activities at NTC Orlando are anticipated to impact the removal schedule.

5.2 ESTIMATED COSTS

Estimated costs for this time-critical removal action is $1,300,000. This cost includes capital costs, mobilization, transportation and disposal, and demobilization cost for the site.

6.0 CONSEQUENCES OF DELAY OR NO ACTION

If the proposed actions are delayed or not implemented, impacts to groundwater may increase and create a larger area of concern. In addition, the planned pilot study to address potential dense non-aqueous phase liquid within the bedrock aquifer will need to be delayed.

7.0 OUTSTANDING POLICY ISSUES

There are no outstanding policy issues for this time-critical removal action.

8.0 ENFORCEMENT

There are no enforcement issues at this site. Complete funding for this removal is approved and provided by the Navy, Southern Division.

9.0 RECOMMENDATION

This decision document represents the rationale for selection of the time-critical removal action for the site, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the site.

Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a time-critical removal action; therefore, approval of the time-critical removal action is recommended. To minimize the threat of continuing releases, this time critical removal action will be implemented beginning in April 1999.

10.0 PUBLIC PARTICIPATION

This TCRAM will be placed in the administrative record for NTC Orlando within 60 days of initiation of field activities. The public will have an opportunity to review the scope of this removal action at that time.

ATTACHMENT 2

BORROW MATERIAL ANALYTICAL DATA

0 1 6 4 4 3

Environmental Conservation Laboratories, Inc.
4810 Executive Park Court, Suite 211
Jacksonville, Florida 32216-6069
904 / 296-3007
Fax 904 / 296-6210
www.encolabs.com

ENCO Laboratories

DHRS Certification No. E82277

CLIENT : Bechtel Environmental, Inc.
ADDRESS: NAS Cecil Field
P.O. Box 171
Jacksonville, FL 32215

REPORT # : JR6722
DATE SUBMITTED: May 13, 1999
DATE REPORTED : May 19, 1999

ATTENTION: Bill Havertys

SAMPLE IDENTIFICATION

Samples submitted and
identified by client as:

Golf Course - McCoy Annex D.O.#107

05/13/99

#1 - #1 PIT SAMPLE @ 15:55
#2 - #2 TOP SOIL @ 16:45

PROJECT MANAGER Scott D. Martin
Scott D. Martin

ENCO LABORATORIES
REPORT # : JR6722
DATE REPORTED: May 19, 1999
PROJECT NAME : Golf Course
McCoy Annex
DO#107

RESULTS OF ANALYSIS

EPA METHOD 8081 - PESTICIDES	#1 PIT SAMPLE	#2 TOP SOIL	Units
Mirex	3.5 U	3.4 U	µg/Kg
alpha-BHC	3.5 U	3.4 U	µg/Kg
gamma-BHC (Lindane)	3.5 U	3.4 U	µg/Kg
beta-BHC	3.5 U	3.4 U	µg/Kg
Heptachlor	3.5 U	3.4 U	µg/Kg
delta-BHC	3.5 U	3.4 U	µg/Kg
Aldrin	3.5 U	3.4 U	µg/Kg
Heptachlor Epoxide	3.5 U	3.4 U	µg/Kg
Isodrin	3.5 U	3.4 U	µg/Kg
Chlordane gamma	3.5 U	3.4 U	µg/Kg
Chlordane alpha	3.5 U	3.4 U	µg/Kg
Endosulfan I	3.5 U	3.4 U	µg/Kg
4,4'-DDE	3.5 U	3.4 U	µg/Kg
Dieldrin	3.5 U	3.4 U	µg/Kg
Endrin	3.5 U	3.4 U	µg/Kg
4,4'-DDD	3.5 U	3.4 U	µg/Kg
Endosulfan II	3.5 U	3.4 U	µg/Kg
4,4'-DDT	3.5 U	3.4 U	µg/Kg
Endrin aldehyde	3.5 U	3.4 U	µg/Kg
Endosulfan sulfate	3.5 U	3.4 U	µg/Kg
Methoxychlor	3.5 U	3.4 U	µg/Kg
Endrin Ketone	3.5 U	3.4 U	µg/Kg
Chlordane (Total)	3.5 U	3.4 U	µg/Kg
Toxaphene	71 U	68 U	µg/Kg
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
2,4,5,6-TCMX	77	89	52-122
DBC	68	79	50-150
Date Extracted	05/14/99	05/14/99	
Date Analyzed	05/15/99	05/15/99	

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

ENCO LABORATORIES
REPORT # : JR6722
DATE REPORTED: May 19, 1999
PROJECT NAME : Golf Course
McCoy Annex
Dorton

RESULTS OF ANALYSIS

EPA METHOD 8150 - HERBICIDES	#1 PIT SAMPLE	#2 TOP SOIL	Units
Dalapon	11 U	10 U	µg/Kg
Dicamba	11 U	10 U	µg/Kg
MCPP	540 U	520 U	µg/Kg
MCPA	540 U	520 U	µg/Kg
Dichloroprop	11 U	10 U	µg/Kg
2,4-D	11 U	10 U	µg/Kg
2,4,5-TP (Silvex)	11 U	10 U	µg/Kg
2,4,5-T	11 U	10 U	µg/Kg
2,4-DB	11 U	10 U	µg/Kg
Dinoseb	11 U	10 U	µg/Kg
Surrogate:	% RECOV	% RECOV	LIMITS
2,4-DCAA	104	100	9-130
Date Extracted	05/17/99	05/17/99	
Date Analyzed	05/19/99	05/19/99	

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

EPA METHOD 8260 - VOLATILE ORGANICS	#1 PIT SAMPLE	#2 TOP SOIL	Units
Dichlorodifluoromethane	2.0 U	2.0 U	µg/Kg
Chloromethane	1.0 U	1.0 U	µg/Kg
Vinyl Chloride	1.0 U	1.0 U	µg/Kg
Bromomethane	1.0 U	1.0 U	µg/Kg
Chloroethane	1.0 U	1.0 U	µg/Kg
Trichlorofluoromethane	1.0 U	1.0 U	µg/Kg
1,1-Dichloroethene	1.0 U	1.0 U	µg/Kg
Acetone	50 U	50 U	µg/Kg
Methylene Chloride	**9.0**	**11**	µg/Kg
t-1,2-Dichloroethene	1.0 U	1.0 U	µg/Kg
Methyl tert-butyl ether	6.0 U	6.0 U	µg/Kg
1,1-Dichloroethane	**2.7**	**1.0**	µg/Kg
2,2-Dichloropropane	2.0 U	2.0 U	µg/Kg
c-1,2-Dichloroethene	1.0 U	1.0 U	µg/Kg
2-Butanone	22 U	21 U	µg/Kg
Chloroform	1.0 U	1.0 U	µg/Kg
1,1,1-Trichloroethane	1.0 U	1.0 U	µg/Kg
Carbon tetrachloride	1.0 U	1.0 U	µg/Kg
1,1-Dichloropropene	1.0 U	1.0 U	µg/Kg
Benzene	1.0 U	1.0 U	µg/Kg
1,2-Dichloroethane	1.0 U	1.0 U	µg/Kg
Trichloroethene	1.0 U	1.0 U	µg/Kg
1,2-Dichloropropane	1.0 U	1.0 U	µg/Kg
Dibromomethane	1.0 U	1.0 U	µg/Kg
Bromodichloromethane	1.0 U	1.0 U	µg/Kg

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

EPA METHOD 8260 (cont.) - VOLATILE ORGANICS	#1 PIT SAMPLE	#2 TOP SOIL	Units
2-Chloroethyl vinyl ether	6.0 U	6.0 U	µg/Kg
c-1,3-Dichloropropene	1.0 U	1.0 U	µg/Kg
4-Methyl-2-pentanone	22 U	21 U	µg/Kg
Toluene	1.0 U	1.0 U	µg/Kg
t-1,3-Dichloropropene	1.0 U	1.0 U	µg/Kg
1,1,2-Trichloroethane	1.0 U	1.0 U	µg/Kg
Tetrachloroethene	3.0 U	3.0 U	µg/Kg
1,3-Dichloropropane	1.0 U	1.0 U	µg/Kg
2-Hexanone	22 U	21 U	µg/Kg
Dibromochloromethane	1.0 U	1.0 U	µg/Kg
1,2-Dibromoethane	1.0 U	1.0 U	µg/Kg
Chlorobenzene	1.0 U	1.0 U	µg/Kg
1,1,1,2-Tetrachloroethane	1.0 U	1.0 U	µg/Kg
Ethylbenzene	1.0 U	1.0 U	µg/Kg
m-Xylene & p-Xylene	2.0 U	2.0 U	µg/Kg
o-Xylene	1.0 U	1.0 U	µg/Kg
Styrene	1.0 U	1.0 U	µg/Kg
Bromoform	1.0 U	1.0 U	µg/Kg
Isopropylbenzene	1.0 U	1.0 U	µg/Kg
1,1,2,2-Tetrachloroethane	1.0 U	1.0 U	µg/Kg
Bromobenzene	1.0 U	1.0 U	µg/Kg
1,2,3-Trichlorobenzene	1.0 U	1.0 U	µg/Kg
n-Propylbenzene	1.0 U	1.0 U	µg/Kg
2-Chlorotoluene	1.0 U	1.0 U	µg/Kg
1,3,5-Trimethylbenzene	1.0 U	1.0 U	µg/Kg
4-Chlorotoluene	1.0 U	1.0 U	µg/Kg

U = Compound was analyzed for but not detected to the level shown.
Dw = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

EPA METHOD 8260 (cont.) - VOLATILE ORGANICS	#1 PIT SAMPLE	#2 TOP SOIL	Units
tert-Butylbenzene	1.0 U	1.0 U	µg/Kg
1,2,4-Trimethylbenzene	1.0 U	1.0 U	µg/Kg
s-Butylbenzene	1.0 U	1.0 U	µg/Kg
1,3-Dichlorobenzene	1.0 U	1.0 U	µg/Kg
p-Isopropyltoluene	1.0 U	1.0 U	µg/Kg
1,4-Dichlorobenzene	1.0 U	1.0 U	µg/Kg
n-Butylbenzene	1.0 U	1.0 U	µg/Kg
1,2-Dichlorobenzene	1.0 U	1.0 U	µg/Kg
1,2-Dibromo-3-chloropropane	1.0 U	1.0 U	µg/Kg
1,2,4-Trichlorobenzene	1.0 U	1.0 U	µg/Kg
Hexachlorobutadiene	1.0 U	1.0 U	µg/Kg
Naphthalene	1.0 U	1.0 U	µg/Kg
1,2,3-Trichloropropane	1.0 U	1.0 U	µg/Kg
Bromochloromethane	1.0 U	1.0 U	µg/Kg
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
Dibromofluoromethane	101	104	59-143
D8-Toluene	99	102	60-115
Bromofluorobenzene	98	98	55-144
Date Analyzed	05/18/99	05/18/99	

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

EPA METHOD 8270 - PAH Compounds	#1 PIT SAMPLE	#2 TOP SOIL	Units
Naphthalene	360 U	340 U	µg/Kg
2-Methylnaphthalene	360 U	340 U	µg/Kg
1-Methylnaphthalene	360 U	340 U	µg/Kg
Acenaphthylene	360 U	340 U	µg/Kg
Acenaphthene	360 U	340 U	µg/Kg
Fluorene	360 U	340 U	µg/Kg
Phenanthrene	360 U	340 U	µg/Kg
Anthracene	360 U	340 U	µg/Kg
Fluoranthene	360 U	340 U	µg/Kg
Pyrene	360 U	340 U	µg/Kg
Chrysene	360 U	340 U	µg/Kg
Benzo(a)anthracene	360 U	340 U	µg/Kg
Benzo(b)fluoranthene	360 U	340 U	µg/Kg
Benzo(k)fluoranthene	360 U	340 U	µg/Kg
Benzo(a)pyrene	360 U	340 U	µg/Kg
Indeno(1,2,3-cd)pyrene	360 U	340 U	µg/Kg
Dibenzo(a,h)anthracene	360 U	340 U	µg/Kg
Benzo(g,h,i)perylene	360 U	340 U	µg/Kg
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
Nitrobenzene -D5	77	80	23-114
2-Fluorobiphenyl	83	84	21-112
Terphenyl -D14	137	146*	24-140
Date Extracted	05/14/99	05/14/99	
Date Analyzed	05/17/99	05/17/99	

MISCELLANEOUS	METHOD	#1 PIT SAMPLE	#2 TOP SOIL	Units
Percent Solids	SM2540G	93	97	%
Date Analyzed		05/15/99	05/15/99	

* Surrogate recovery outside of laboratory established criteria.
U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

TOTAL METALS	METHOD	#1 PIT SAMPLE	#2 TOP SOIL	Units
Aluminum	6010	**2800**	**1100**	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Antimony	6010	2.0 U	2.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Arsenic	6010	0.50 U	0.50 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Barium	6010	22 U	21 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Beryllium	6010	1.0 U	1.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Cadmium	6010	1.0 U	1.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Calcium	6010	**110**	**220**	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Chromium	6010	**1.7**	**3.0**	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Cobalt	6010	5.0 U	5.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Copper	7210	5.0 U	5.0 U	mg/Kg
Date Analyzed		05/17/99	05/17/99	
Iron	6010	**71**	**140**	mg/Kg
Date Analyzed		05/18/99	05/18/99	

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

TOTAL METALS	METHOD	#1 PIT SAMPLE	#2 TOP SOIL	Units
Lead	6010	**1.9**	**1.1**	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Magnesium	6010	27 U	26 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Manganese	6010	1.0 U	**1.0**	mg/Kg
Date Analyzed		05/19/99	05/19/99	
Mercury	7471	0.010 U	0.010 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Nickel	6010	5.0 U	5.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Potassium	7610	25 U	25 U	mg/Kg
Date Analyzed		05/19/99	05/19/99	
Selenium	6010	2.0 U	2.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Silver	6010	2.0 U	2.0 U	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Sodium	7770	27 U	26 U	mg/Kg
Date Analyzed		05/19/99	05/19/99	
Thallium	6010	1.0 U	1.0 U	mg/Kg
Date Analyzed		05/19/99	05/19/99	
Vanadium	6010	**2.0**	**1.1**	mg/Kg
Date Analyzed		05/18/99	05/18/99	
Zinc	6010	5.0 U	**5.2**	mg/Kg
Date Analyzed		05/18/99	05/18/99	

U Compound was analyzed for but not detected to the level shown.
DW = Analysis is reported on a "dry weight" basis.

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EPA METHOD 8082 - PCB/Aroclors	#1 PIT SAMPLE	#2 TOP SOIL	Units
PCB-1016/1242	1.0 U	1.0 U	µg/Kg
PCB-1221	1.0 U	1.0 U	µg/Kg
PCB-1232	1.0 U	1.0 U	µg/Kg
PCB-1248	1.0 U	1.0 U	µg/Kg
PCB-1254	1.0 U	1.0 U	µg/Kg
PCB-1260	1.0 U	1.0 U	µg/Kg
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
2,4,5,6-TCMX	75	88	55-152
DBC	68	79	55-152
Date Extracted	05/14/99	05/14/99	
Date Analyzed	05/15/99	05/15/99	

U Compound was analyzed for but not detected to the level shown.
Dw = Analysis is reported on a "dry weight" basis.

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RESULTS OF ANALYSIS

EPA METHOD 8150 - HERBICIDES	LAB BLANK	Units
Dalapon	10 U	µg/Kg
Dicamba	10 U	µg/Kg
MCPP	500 U	µg/Kg
MCPA	500 U	µg/Kg
Dichloroprop	10 U	µg/Kg
2,4-D	10 U	µg/Kg
2,4,5-TP (Silvex)	10 U	µg/Kg
2,4,5-T	10 U	µg/Kg
2,4-DB	10 U	µg/Kg
Dinoseb	10 U	µg/Kg
Surrogate:	**% RECOV**	**LIMITS**
2,4-DCAA	95	9-130
Date Extracted	05/17/99	
Date Analyzed	05/19/99	

U = Compound was analyzed for but not detected to the level shown.

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RESULTS OF ANALYSIS

EPA METHOD 8260 - VOLATILE ORGANICS	LAB BLANK	Units
Dichlorodifluoromethane	2.0 U	µg/Kg
Chloromethane	1.0 U	µg/Kg
Vinyl Chloride	1.0 U	µg/Kg
Bromomethane	1.0 U	µg/Kg
Chloroethane	1.0 U	µg/Kg
Trichlorofluoromethane	1.0 U	µg/Kg
1,1-Dichloroethene	1.0 U	µg/Kg
Acetone	20 U	µg/Kg
Methylene Chloride	5.0 U	µg/Kg
t-1,2-Dichloroethene	1.0 U	µg/Kg
Methyl tert-butyl ether	6.0 U	µg/Kg
1,1-Dichloroethane	1.0 U	µg/Kg
2,2-Dichloropropane	2.0 U	µg/Kg
c-1,2-Dichloroethene	1.0 U	µg/Kg
2-Butanone	20 U	µg/Kg
Chloroform	1.0 U	µg/Kg
1,1,1-Trichloroethane	1.0 U	µg/Kg
Carbon tetrachloride	1.0 U	µg/Kg
1,1-Dichloropropene	1.0 U	µg/Kg
Benzene	1.0 U	µg/Kg
1,2-Dichloroethane	1.0 U	µg/Kg
Trichloroethene	1.0 U	µg/Kg
1,2-Dichloropropane	1.0 U	µg/Kg
Dibromomethane	1.0 U	µg/Kg
Bromodichloromethane	1.0 U	µg/Kg

U = Compound was analyzed for but not detected to the level shown.

RESULTS OF ANALYSIS

EPA METHOD 8260 (cont.) - VOLATILE ORGANICS	LAB BLANK	Units
2-Chloroethyl vinyl ether	6.0 U	µg/Kg
c-1,3-Dichloropropene	1.0 U	µg/Kg
4-Methyl-2-pentanone	20 U	µg/Kg
Toluene	1.0 U	µg/Kg
t-1,3-Dichloropropene	1.0 U	µg/Kg
1,1,2-Trichloroethane	1.0 U	µg/Kg
Tetrachloroethene	3.0 U	µg/Kg
1,3-Dichloropropane	1.0 U	µg/Kg
2-Hexanone	20 U	µg/Kg
Dibromochloromethane	1.0 U	µg/Kg
1,2-Dibromoethane	1.0 U	µg/Kg
Chlorobenzene	1.0 U	µg/Kg
1,1,1,2-Tetrachloroethane	1.0 U	µg/Kg
Ethylbenzene	1.0 U	µg/Kg
m-Xylene & p-Xylene	2.0 U	µg/Kg
o-Xylene	1.0 U	µg/Kg
Styrene	1.0 U	µg/Kg
Bromoform	1.0 U	µg/Kg
Isopropylbenzene	1.0 U	µg/Kg
1,1,2,2-Tetrachloroethane	1.0 U	µg/Kg
Bromobenzene	1.0 U	µg/Kg
1,2,3-Trichlorobenzene	1.0 U	µg/Kg
n-Propylbenzene	1.0 U	µg/Kg
2-Chlorotoluene	1.0 U	µg/Kg
1,3,5-Trimethylbenzene	1.0 U	µg/Kg
4-Chlorotoluene	1.0 U	µg/Kg

U = Compound was analyzed for but not detected to the level shown.

RESULTS OF ANALYSIS

EPA METHOD 8260 (cont.) - VOLATILE ORGANICS	LAB BLANK	Units
tert-Butylbenzene	1.0 U	µg/Kg
1,2,4-Trimethylbenzene	1.0 U	µg/Kg
s-Butylbenzene	1.0 U	µg/Kg
1,3-Dichlorobenzene	1.0 U	µg/Kg
p-Isopropyltoluene	1.0 U	µg/Kg
1,4-Dichlorobenzene	1.0 U	µg/Kg
n-Butylbenzene	1.0 U	µg/Kg
1,2-Dichlorobenzene	1.0 U	µg/Kg
1,2-Dibromo-3-chloropropane	1.0 U	µg/Kg
1,2,4-Trichlorobenzene	1.0 U	µg/Kg
Hexachlorobutadiene	1.0 U	µg/Kg
Naphthalene	1.0 U	µg/Kg
1,2,3-Trichloropropane	1.0 U	µg/Kg
Bromochloromethane	1.0 U	µg/Kg
Surrogate:	**% RECOV**	**LIMITS**
Dibromofluoromethane	106	59-143
D8-Toluene	102	60-115
Bromofluorobenzene	98	55-144
Date Analyzed	05/18/99	

U = Compound was analyzed for but not detected to the level shown.

RESULTS OF ANALYSIS

EPA METHOD 8270 - PAH Compounds	LAB BLANK	Units
Naphthalene	330 U	µg/Kg
2-Methylnaphthalene	330 U	µg/Kg
1-Methylnaphthalene	330 U	µg/Kg
Acenaphthylene	330 U	µg/Kg
Acenaphthene	330 U	µg/Kg
Fluorene	330 U	µg/Kg
Phenanthrene	330 U	µg/Kg
Anthracene	330 U	µg/Kg
Fluoranthene	330 U	µg/Kg
Pyrene	330 U	µg/Kg
Chrysene	330 U	µg/Kg
Benzo(a)anthracene	330 U	µg/Kg
Benzo(b)fluoranthene	330 U	µg/Kg
Benzo(k)fluoranthene	330 U	µg/Kg
Benzo(a)pyrene	330 U	µg/Kg
Indeno(1,2,3-cd)pyrene	330 U	µg/Kg
Dibenzo(a,h)anthracene	330 U	µg/Kg
Benzo(g,h,i)perylene	330 U	µg/Kg
Surrogate:	**% RECOV**	**LIMITS**
Nitrobenzene -D5	87	23-114
2-Fluorobiphenyl	90	21-112
Terphenyl -D14	115	24-140
Date Extracted	05/14/99	
Date Analyzed	05/14/99	

TOTAL METALS	METHOD	LAB BLANK	Units
Aluminum	6010	20 U	mg/Kg
Date Analyzed		05/17/99	

U = Compound was analyzed for but not detected to the level shown.

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RESULTS OF ANALYSIS

TOTAL METALS	METHOD	LAB BLANK	Units
Antimony Date Analyzed	6010	2.0 U 05/17/99	mg/Kg
Arsenic Date Analyzed	6010	0.50 U 05/17/99	mg/Kg
Barium Date Analyzed	6010	20 U 05/17/99	mg/Kg
Beryllium Date Analyzed	6010	1.0 U 05/17/99	mg/Kg
C[illegible]nium Date Analyzed	6010	1.0 U 05/17/99	mg/Kg
Calcium Date Analyzed	6010	25 U 05/17/99	mg/Kg
Chromium Date Analyzed	6010	1.0 U 05/17/99	mg/Kg
Cobalt Date Analyzed	6010	5.0 U 05/17/99	mg/Kg
Copper Date Analyzed	7210	5.0 U 05/17/99	mg/Kg
Iron Date Analyzed	6010	10 U 05/17/99	mg/Kg
Lead Date Analyzed	6010	1.0 U 05/17/99	mg/Kg

U = Compound was analyzed for but not detected to the level shown.

RESULTS OF ANALYSIS

TOTAL METALS	METHOD	LAB BLANK	Units
Magnesium	6010	25 U	mg/Kg
Date Analyzed		05/17/99	
Manganese	6010	1.0 U	mg/Kg
Date Analyzed		05/19/99	
Mercury	7471	0.010 U	mg/Kg
Date Analyzed		05/18/99	
Nickel	6010	5.0 U	mg/Kg
Date Analyzed		05/17/99	
P[illegible]assium	7610	25 U	mg/Kg
Date Analyzed		05/19/99	
Selenium	6010	2.0 U	mg/Kg
Date Analyzed		05/17/99	
Silver	6010	2.0 U	mg/Kg
Date Analyzed		05/17/99	
Sodium	7770	25 U	mg/Kg
Date Analyzed		05/19/99	
Thallium	6010	1.0 U	mg/Kg
Date Analyzed		05/19/99	
Vanadium	6010	1.0 U	mg/Kg
Date Analyzed		05/17/99	
Zinc	6010	5.0 U	mg/Kg
Date Analyzed		05/17/99	

U = Compound was analyzed for but not detected to the level shown.

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8081				
gamma-BHC (Lindane)	110/104/104	41-133	6	24
Heptachlor	144/129/135	21-154	10	30
Aldrin	95/ 89/ 89	23-150	6	30
Endrin	129/119/120	38-133	8	36
4,4'-DDT	116/106/108	46-138	10	26
EPA Method 8150				
Dalapon	87/ 79/ 83	37-159	10	35
Dicamba	124/104/108	25-236	18	47
2,4-D	108/ 92/ 96	45-178	16	27
2,4,5-TP (Silvex)	102/ 88/ 91	51-176	15	46
2,4-DB	117/ 87/ 74	D-136	29	38
EPA Method 8260				
1,1-Dichloroethene	123/101/123	52-134	20#	19
Benzene	114/108/114	62-118	5	23
Trichloroethene	94/ 95/114	46-117	1	17
Toluene	102/102/113	38-130	<1	22
Chlorobenzene	100/100/111	37-128	<1	24

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8270				
2-Methylnaphthalene	*/ * / 92	38-112	*	33
1-Methylnaphthalene	*/ * / 89	50-135	*	30
Acenaphthylene	*/ * / 97	52-118	*	30
Fluorene	*/ * / 90	53-121	*	44
Pyrene	*/ * /100	49-117	*	30
Total Metals				
Aluminum, 6010	* / * /105	35-172	*	32
Antimony, 6010	#61/ 62/ 96	85-112	2	28
Arsenic, 6010	100/100/ 98	67-118	<1	12
Barium, 6010	103/ 99/ 98	70-120	4	16
Beryllium, 6010	113/102/110	88-111	10	12
Cadmium, 6010	102/101/ 99	69-119	<1	12
Calcium, 6010	117/ 97/101	71-121	19	19
Chromium, 6010	104/100/ 99	73-120	4	18
Cobalt, 6010	109/ 97/104	78-117	12	17
Copper, 7210	124/110/108	69-129	12	16
Iron, 6010	* / * /103	48-139	*	38
Lead, 6010	109/ 97/ 95	63-128	12	26
Magnesium, 6010	108/102/101	62-121	6	23

Environmental Conservation Laboratories Comprehensive QA Plan #960038
* = MS/MSD/RPD unavailable due to high original sample concentration.
\# = One or more of the associated values failed to meet laboratory established criteria for accuracy.
< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
Manganese, 6010	97/ 94/100	84-124	3	21
Mercury, 7471	96/ 95/105	71-138	1	13
Nickel, 6010	109/ 99/104	78-111	10	14
Selenium, 6010	95/ 98/ 97	60-121	3	14
Silver, 6010	95/111/ 93	69-118	16	10
Sodium, 7770	92/ 95/ 93	82-124	3	16
Thallium, 6010	86/ 87/ 94	85-109	1	14
Vanadium, 6010	117/ 99/106	81-119	17#	16
Zinc, 6010	* / * /108	76-125	*	19
P /Aroclors				
PCB-1221	74/ 77/ 74	8-127	4	49

Environmental Conservation Laboratories Comprehensive QA Plan #960038
= One or more of the associated values failed to meet laboratory established criteria for precision.
* = MS/MSD/RPD unavailable due to high original sample concentration.
< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

ENVIRONMENTAL CONSERVATION LABORATORIES

QSARF #09716

4810 Executive Park Court, Suite 211
Jacksonville, Florida 32216-6069
Ph. (904) 296-3007 • Fax (904) 296-6210

10207 General Drive
Orlando, Florida 32824
Ph. (407) 826-5314 • Fax (407) 850-6945

ENCO CompQAP No.: 960038G/0

CHAIN OF CUSTODY RECORD

PROJECT REFERENCE: Golf Course	PROJECT NO.: Do# 107 McCoy Annex	P.O. NUMBER: well
PROJECT LOC. (State):	SAMPLER(s) NAME: Alex Baader	PHONE / FAX
CLIENT NAME: Bechtel	CLIENT PROJECT MANAGER: Bill Faverty's	
CLIENT ADDRESS (CITY, STATE, ZIP)		

PAGE ___ OF ___

☐ STANDARD REPORT DELIVERY

☐ EXPEDITED REPORT DELIVERY (surcharge)

Date Due: Wed. 5/19.

SAMPLE STATION	DATE	TIME	GRAB	COMP	SAMPLE IDENTIFICATION	MATRIX TYPE: SURFACE WATER	GROUND WATER	WASTEWATER	DRINKING WATER	SOIL/SOLID/SEDIMENT	NONAQUEOUS LIQUID (oil, solvent, etc.)	AIR	SLUDGE	OTHER	REQUIRED ANALYSIS: 8260	8150	8270	TAL Metals	8081/8082	PRESERVATIVE	NUMBER OF CONTAINERS SUBMITTED			REMARKS
1 #1	5/13/99	1555			Pit sample					✓					3	1		1						per Jim G. 8260, 8081, 8082, TAL metals farmed to Jax. For Rush 5/19/99. Rushed by Rick C. in Jax
2																								
3 #2	5/13/99	1645			Top Soil					✓					3	1		1						
4																								
5																								
6																								
7																								
8																								
9																								
10																								
11																								
12																								
13																								
14																								

SAMPLE KIT PREPARED BY: ☐JACKSONVILLE ☐ORLANDO	DATE	TIME	RELINQUISHED BY: (SIGNATURE) R. Armstrong	DATE 5/13/99	TIME 5:25	RECEIVED BY: (SIGNATURE)	DATE 5/13/99 TIME 1550
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE 5/13/99 TIME 1645
RECEIVED BY (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE TIME

RECEIVED FOR LABORATORY BY: (SIGNATURE)	DATE	TIME	CUSTODY INTACT	ENCO LOG NO.	REMARKS
Kevin Casey ☐ Jacksonville ☑ Orlando	5/13/99	5:30pm	☐ YES ☒ NO	016602	

ATTACHMENT 3

AS-BUILT DRAWING

N

ALTERNATE ACCESS
FROM 8TH EXPRESS STREET

8TH EXPRESS STREET

P1

P2

NO 9

SWAMP/
WOODS

P3 N
P3 S

SG1

POND

DRIVING
RANGE

SG2

TANK
FARM
AREA

SWAMP/
WOODS

P4

POND

NO 8

P6

SG3

P5

S103

POND

B

B'

SG4

P12

P22 N
P22 S

P7

P8 N
P8 S

SG10

P9

S91

B

B'

SG11

SG6

WETLAND

P10

G28

G29

P11

SG5

P13

AREA B

ORANGE PLASTIC SNOW FENCE ON
TOP OF 2 FT SOIL COVER MARKS THE
SOUTH BOUNDARY OF COMPLETED SOIL
COVER (APPROX LOCATION)

P17

SG8

P23

AREA A

P16

P15

P14 N
P14 S

BURROW
#15

BURROW
#5

ACTIVE

AREA REQUIRING
ADDITIONAL
SOIL COVER

INACTIVE
BURROW
#13

A

A'

SG7

PRIMARY
ACCESS
FROM BOGGY
CREEK ROAD

P18

P19

24"± CMP INSTALLED
FOR DRAINAGE

WETLAND

50 UNDISTURBED
BUFFER ZONE

P20

WOODS

SG9

WETLAND

P21N
P21S

ROAD

TRADEPORT

0 300 600 900

SCALE IN FEET

LEGEND

GOPHER TORTOISE BURROW (ACTIVE)

GOPHER TORTOISE BURROW (INACTIVE)

1 ACRE SAMPLE GRID

EXCAVATION WITHIN 1 ACRE SAMPLE GRID

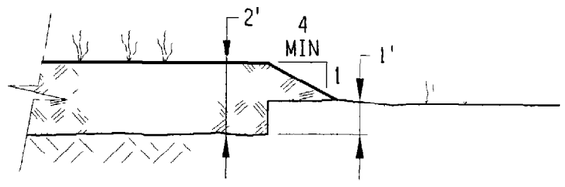
2 FOOT COVER INSTALLED

TRUCK ROUTE

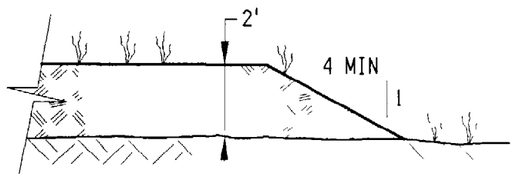
PIEZOMETERS

STAFF GAUGES

SAMPLE LOCATION DESIGNATOR



SECTION B-B'
NTS



SECTION A-A'
NTS

O:\22567\30 305F035.DGN
03/01/2000

Figure 1 3 - As-Built - July 1999
Site Activities Plan
McCoy Annex Landfill Cover

ATTACHMENT 4

NOTICE OF INTENT
AND
STORM WATER
POLLUTION PREVENTION PLAN

305-000015

BUILDING A CENTURY 1898 BECHTEL 1998

APR 7 1999

Storm Water Notice of Intent (4203)
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
STORM WATER NOTICE OF INTENT FOR REMEDIAL ACTIONS AT MCCOY ANNEX LANDFILL AT NTC ORLANDO, FL

Dear EPA:

Enclosed is the Storm Water Notice of Intent for Remedial Action at the McCoy Annex Landfill at NTC Orlando, Florida. Bechtel Environmental, Inc. is submitting this Notice Of Intent on behalf of the Commanding Officer, United States Navy, Naval Training Center Orlando, Florida. Pursuant to the March 31, 1998, Federal Register (Volume 63, Number 61), this constitutes the Navy's intent to be covered by the general permit for discharges of storm water from construction activities "associated with industrial activity."

This project is being conducted under the jurisdiction of the Comprehensive Environmental Restoration, Compensation, and Liability Act (CERCLA), also known as the Superfund program. CERCLA provides in Section 121(e) of the Act, that no federal, state, or local permits are required to be obtained by the agency conducting the project. However, the law does require that any substantive requirements that would otherwise be contained in a permit must be implemented during the project. The Navy has prepared the Storm Water Pollution Protection Plan (SWPPP) for the site as a substantive requirement and will be implementing Best Management Practices for storm water control in the field.

Copies of the SWPPP are available at the following locations: (1) on Base with Public Works Department staff, (2) for the duration of land disturbing activities, with the Bechtel Environmental field office, (3) at Bechtel Environmental's Oak Ridge, Tennessee, office, and (4) Southern Division, NAVFACENGCOM office. NTC Orlando is a closed base. The base is scheduled to be turned over from NTC Orlando command to Southern Division, NAVFACENGCOM office within the Department of Defense, at the end of April 1999. Southern Division will be maintaining the property until an ownership transfer to the City of Orlando takes place. After May 1, 1999, responsibility for and implementation of the SWPPP will rest with Southern Division.

Please contact William Hevrdeys at (423) 220-2534 or Lt. G. Whipple, Public Works Officer, NTC Orlando, (407) 646-4735, if you have any questions.

Sincerely,

K.S. Atchley

K.S. Atchley
Project Manager

RA:pw:Lr1804
Attachment: As stated

cc: Commanding Officer, c/o Lt. G. Whipple, NTC Orlando
Lt. G. Whipple, NTC Orlando
B. Nwokike, SDIV
W. Hansel, SDIV
N. Rodriguez, EPA Region IV
D. Grabka, FDEP
S. McCoy, Tetra-Tech NUS

THIS FORM REPLACES PREVIOUS FORM 3510-6 (8-98)
See Reverse for Instructions

Form Approved. OMB No. 2040-0188

NPDES FORM

EPA

United States Environmental Protection Agency
Washington, DC 20460

Notice of Intent (NOI) for Storm Water Discharges Associated wit CONSTRUCTION ACTIVITY Under a NPDES General Permit

Submission of this Notice of Intent constitutes notice that the party identified in Section I of this form intends to be authorized by a NPDES permit issued for storm water discharges associated with construction activity in the State/Indian Country Land identified in Section II of this form. Submission of this Notice of Intent also constitutes notice that the party identified in Section I of this form meets the eligibility requirements in Part I.B. of the general permit (including those related to protection of endangered species determined through the procedures in Addendum A of the general permit), understands that continued authorization to discharge is contingent on maintaining permit eligibility, and that implementation of the Storm Water Pollution Prevention Plan required under Part IV of the general permit will begin at the time the permittee commences work on the construction project identified in Secion II below. IN ORDER TO OBTAIN AUTHORIZATION, ALL INFORMATION REQUESTED MUST BE INCLUDED ON THIS FORM. SEE INSTRUCTIONS ON BACK OF FORM.

I. Owner/Operator (Applicant) Information

Point of Contact: Lt. G. Whipple

Name: Commanding Officer - NTC Phone: 407-646-4735

Address: 1350 Grace Hopper Avenue Status of Owner/Operator: F

City: Orlando State: FL Zip Code: 32813-8405

II. Project/Site Information

Is the facility located on Indian Country Lands? Yes ☐ No ☒

Project Name: NTC McCoy Annex Landfill

Project Address/Location: 3850 Eighth Street

City: Orlando State: FL Zip Code: 32837

Latitude: 28 25 10 Longitude: 81 20 44 County: Orange

Has the Storm Water Pollution Prevention Plan (SWPPP) been prepared? Yes ☒ No ☐

Optional: Address of location of SWPPP for viewing ☒ Address in Section I above ☒ Address in Section II above ☒ Other address (if known) below:

SWPPP Address: 151 Lafayette Drive Phone: 423-220-2534

City: Oak Ridge State: TN Zip Code: 37831-0350

Name of Receiving Water: Lake Gillooly

04/19/99 (Month Day Year) Estimated Construction Start Date

01/30/2000 (Month Day Year) Estimated Completion Date

Estimate of area to be disturbed (to nearest acre): 30

Estimate of Likelihood of Discharge (choose only one):

1. ☒ Unlikely
2. ☐ Once per month
3. ☐ Once per week
4. ☐ Once per day
5. ☐ Continual

Based on instruction provided in Addendum A of the permit, are there any listed endangered or threatened species, or designated critical habitat in the project area?

Yes ☐ No ☒

I have satisfied permit eligibility with regard to protection of endangered species through the indicated section of Part I.B.3.a.(2) of the permit (check one or more boxes):

(a) ☒ (b) ☐ (c) ☐ (d) ☐

III. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: for PAUL TOMICZEK Date: 04/07/99

Signature: Ken J. Adley

EPA Form 3510-9 replaced 3510-6 (8-98)

305- 00016

BUILDING A CENTURY 1898 BECHTEL 1998

APR 9 1999

Mr. Eric Lervaag
Office of Permitting Services
Orlando City Hall
400 S. Orange Ave
Orlando, FL 32801

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
PLANNED MCCOY ANNEX LANDFILL COVER PROJECT, DO 0107
Subject Code: 7550

Dear Mr. Lervaag:

Per your discussions with Mr. Richard Atwood and Mr. Bill Hevrdeys of our office on April 1 and 7, 1999, Bechtel is enclosing a copy of the draft work plan for the McCoy Annex Landfill Cover Project. We are also enclosing a copy of the Storm Water Notice of Intent (NOI) to be filed with EPA Region IV to demonstrate substantive compliance with the NPDES storm water permitting requirements for land disturbing activities greater than 5 acres. Attached to the NOI is the Storm Water Pollution Prevention Plan (SWPPP) for the site. Bechtel Environmental, Inc. is submitting these documents on behalf of the Commanding Officer, United States Navy, Naval Training Center Orlando, Florida.

This project is being conducted under the jurisdiction of the Comprehensive Environmental Restoration, Compensation, and Liability Act (CERCLA), also known as the Superfund program. CERCLA provides in Section 121(e) of the Act that no federal, state, or local permits are required to be obtained by the agency conducting the project. However, the law does require that any *substantive* requirements that would otherwise be contained in a permit must be implemented during the project.

We are requesting that your office review the enclosed work plan, Storm Water NOI, and SWPPP. If there are any design requirements that the City believes should be met during field construction activities, please communicate those requirements to Mr. Atwood or me by April 21, 1999, so Bechtel may make provisions to implement them during field construction. We apologize for the very short turnaround time we requested; however, our schedule is driven in part by the turnover of this property to the City of Orlando.

Thank you for your time and efforts. If you have any questions or need additional information, please contact me or Mr. Atwood at (423) 220-2000.

Sincerely,

William Hevrdeys

W. E. Hevrdeys
Project Superintendent

RA:pw:lr1803
Enclosures: As stated

cc: Commanding Officer, c/o Lt. G. Whipple, NTC Orlando
Lt. G. Whipple, NTC Orlando
B. Nwokike, SDIV
W. Hansel, SDIV
N. Rodriguez, EPA Region IV
D. Grabka, FDEP
S. McCoy, Tetra-Tech NUS

BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

THIS FORM REPLACES PREVIOUS FORM 3510-6 (8-98)
See Reverse for Instructions

Form Approved. OMB No. 2040-0188

NPDES FORM

EPA

United States Environmental Protection Agency
Washington, DC 20460

Notice of Intent (NOI) for Storm Water Discharges Associated wit CONSTRUCTION ACTIVITY Under a NPDES General Permit

Submission of this Notice of Intent constitutes notice that the party identified in Section I of this form intends to be authorized by a NPDES permit issued for storm water discharges associated with construction activity in the State/Indian Country Land identified in Section II of this form. Submission of this Notice of Intent also constitutes notice that the party identified in Section I of this form meets the eligibility requirements in Part I.B. of the general permit (including those related to protection of endangered species determined through the procedures in Addendum A of the general permit), understands that continued authorization to discharge is contingent on maintaining permit eligibility, and that implementation of the Storm Water Pollution Prevention Plan required under Part IV of the general permit will begin at the time the permittee commences work on the construction project identified in Secion II below. IN ORDER TO OBTAIN AUTHORIZATION, ALL INFORMATION REQUESTED MUST BE INCLUDED ON THIS FORM. SEE INSTRUCTIONS ON BACK OF FORM.

I. Owner/Operator (Applicant) Information

Point of Contact: Lt. G. Whipple

Name: Commanding Officer - NTC Phone: 407-646-4735

Address: 1350 Grace Hopper Avenue Status of Owner/Operator: F

City: Orlando State: FL Zip Code: 32813-8405

II. Project/Site Information

Is the facility located on Indian Country Lands? Yes ☐ No ☒

Project Name: NTC McCoy Annex Landfill

Project Address/Location: 3850 Eighth Street

City: Orlando State: FL Zip Code: 32837

Latitude: 28 25 10 Longitude: 81 20 44 County: Orange

Has the Storm Water Pollution Prevention Plan (SWPPP) been prepared? Yes ☒ No ☐

Optional: Address of location of SWPPP for viewing ☒ Address in Section I above ☒ Address in Section II above ☒ Other address (if known) below:

SWPPP Address: 151 Lafayette Drive Phone: 423-220-2534

City: Oak Ridge State: TN Zip Code: 37831-0350

Name of Receiving Water: Lake Gillooly

04/19/99 (Month Day Year) Estimated Construction Start Date

01/30/2000 (Month Day Year) Estimated Completion Date

Estimate of area to be disturbed (to nearest acre): 30

Estimate of Likelihood of Discharge (choose only one):

1. ☒ Unlikely 3. ☐ Once per week 5. ☐ Continual
2. ☐ Once per month 4. ☐ Once per day

Based on instruction provided in Addendum A of the permit, are there any listed endangered or threatened species, or designated critical habitat in the project area?

Yes ☐ No ☒

I have satisfied permit eligibility with regard to protection of endangered species through the indicated section of Part I.B.3.e.(2) of the permit (check one or more boxes):

(a) ☒ (b) ☐ (c) ☐ (d) ☐

III. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: for PAUL TOMICZEK Date: 04/07/99

Signature: Kara J. Atkley

EPA Form 3510-9 replaced 3510-6 (8-98)

STORM WATER POLLUTION PREVENTION PLAN

FOR

NAVAL TRAINING CENTER ORLANDO

MCCOY ANNEX LANDFILL

Prepared for:
Department of the Navy, Southern Division
Naval Facilities Engineering Command

Prepared by:
Bechtel Environmental, Inc.
151 Lafayette Drive
Oak Ridge, Tennessee 37830

Contract No. N62467-93-D-0936
Job No. 22567

April 1999

Revision 0

CONTENTS

Page

ACRONYMS

Bechtel	Bechtel Environmental, Inc.
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	United States Environmental Protection Agency
FAC	Florida Administrative Code
NOI	Notice of Intent
NPDES	National Pollution Discharge Elimination System
NTC	Naval Training Center
OU 2	Operable Unit No.2
RAC	Navy Environmental Response Action Contractor
SCTL	State of Florida Soil Cleanup Target Levels
SOUTHDIV	U.S. Department of Navy, Southern Division, Naval Facilities Engineering Command
SWPPP	Storm Water Pollution Prevention Plan

UNITS OF MEASURE

ft	foot
in.	inch

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) requires a National Pollution Discharge Elimination System (NPDES) permit for "storm water discharges associated with industrial activity", pursuant to 40 CFR 122. Construction activities that disturb greater than 5 acres of land and have point source discharges to waters of the United States are defined as an "industrial activity." To obtain the required permit, a Notice of Intent (NOI) may be submitted to EPA. Although Naval Training Center (NTC) Orlando is not required to obtain an NPDES permit for the McCoy Annex Landfill scope of work, [pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 121(e) permit exemption for response actions], the substantive requirement in the NOI to have a Storm Water Pollution Prevention Plan (SWPPP) in place will be met by implementation of this document.

This document constitutes the SWPPP for the McCoy Annex Landfill at NTC Orlando, Florida for the scope of work described below to be performed by Bechtel Environmental, Inc. (Bechtel). This SWPPP was prepared in accordance with good engineering practices. The Plan identifies potential sources of pollution reasonably expected to affect the quality of storm water discharges from the construction sites. In addition, the Plan describes and ensures the implementation of practices which will be used to reduce the pollutants in storm water discharges associated with industrial activity at the construction site and to assure compliance with the terms and conditions of the permit. Standard permit conditions are listed in Appendix A of this document. Also attached to this plan in Appendix B are the Contractor's Certification Statement and Storm Water control inspection forms. Attachment C contains a site map of the areas addressed in the Plan.

The U.S. Department of Navy, Southern Division, Naval Facilities Engineering Command (SOUTHDIV) is conducting environmental remediation and restoration programs at NTC Orlando, Florida. Bechtel, the Navy Environmental Response Action Contractor (RAC), is performing remedial actions under the direction of SOUTHDIV as part of prime contract N62467-93-D-0936. The work will be performed under the Installation Restoration Program as directed by Delivery Order 0107 dated September 3, 1998. This removal action addresses the excavation of two small areas on the McCoy Golf Course which exceed the State of Florida Soil Cleanup Target Levels (SCTLs) for residential use and placing a 2 ft soil cover on a portion of the McCoy Annex Landfill (a former landfill site last used for waste disposal in 1978). The additional 2 ft soil cover would reduce rainfall infiltration and mobilization of contamination from the source area into the groundwater. It also eliminates the risk of exposure to surface contamination.

1.1 SITE DESCRIPTION

Project Name and Location:

NTC McCoy Annex Landfill, 3850 Eighth Street, Orlando, Fl., 32837
Landfill Soil Cover: Latitude: 28° 25' 10" Longitude: 81° 20' 44"

Owner Name and Address:

U.S. Department of the Navy, Naval Training Center Orlando, Florida
Attn: Commanding Officer
1350 Grace Hopper Avenue
Orlando, FL 32813-8405

The NTC is scheduled to be turned over from NTC Orlando command to SOUTHDIV at the end of April 1999. SOUTHDIV will be maintaining the property until an ownership transfer to the City of Orlando takes place. After May 1, 1999, responsibility for and implementation of the SWPPP will rest with SOUTHDIV.

1.2 PROJECT DESCRIPTION

McCoy Annex encompasses approximately 877 acres and is one of four discrete facilities comprising the NTC in Orlando. The McCoy Annex is located immediately west of the Orlando International Airport. The McCoy Annex landfill, also identified as Operable Unit No.2 (OU-2), is located in the southern part of the McCoy Annex and last used in 1978. The former landfill site occupies approximately 99 acres. It underlies a large part of the 9-hole golf course and most of the wooded area to the south. A cover with varied depth exists over the landfill. The landfill area to the west of the Tee for Hole No. 5 and the northern portion of the wooded area will receive an additional 2 ft of soil cover. The soil cover will be placed on approximately 25 acres of the landfill. Contaminated soil will be removed from two areas on the golf course, each approximately 0.6 acres. These areas will be backfilled with a minimum 2-ft depth soil cover. The locations of the soil cover area and contaminated soil removal areas are shown on Figure 1 in Appendix C.

1.2.1 McCoy Annex Landfill Soil Cover

A 2-ft soil cover will be placed on approximately 25 acres of the 99-acre McCoy Annex Landfill. A Remedial Investigation by the Navy CLEAN contractor has identified on a drawing and delineated at the site the portion of the landfill requiring the additional soil cover to ensure a 2-ft minimum cover thickness exists throughout. A wetland survey by the Navy CLEAN contractor was also performed to delineate the wetlands in the project area. The wetlands will be protected from construction activities with a 50-ft undisturbed buffer zone and sediment control barriers. Before the soil cover is placed, sediment control barriers will be installed on the down gradient drainage paths, and an area of approximately 30 acres will be harvested of merchantable trees, then cleared and grubbed of remaining trees and vegetation. The cleared area is slightly larger than the 2-ft soil cover area, allowing for a perimeter access and staging area. Soil for the cover material will be trucked in from offsite locations by other Government contractors. Truck haul routes are shown on Figure 1, Appendix C. The soil will be compacted in place and grass turf established on the soil cover surface.

1.2.2 Golf Course Contaminated Soil Removal Areas – McCoy Annex

Two contaminated areas, approximately 0.6 acres each, have been identified by SOUTHDIV for removal. The locations are north of the fairway for Hole No. 3 and north of the fairway for Hole No. 7 on the NTC McCoy Annex Golf Course. Minimal clearing will be required. Both areas abut surface water drainage ponds. Sediment control barriers will be installed along the edge of the pond that adjoins the excavation area. The area excavation will stop at the pond interface. Material will be removed to a depth of 1 ft from each of the areas and clean fill will be trucked in from offsite, placed, and compacted to a depth of 24 in. over the areas excavated. A grass turf will be established on the fill material.

1.3 RUNOFF COEFFICIENT

1.3.1 McCoy Annex Landfill Soil Cover

The McCoy Annex Landfill soil cover and clearing encompasses an area of approximately 30 acres. The area is relatively flat, and is presently vegetated by forest with low underbrush and grasses. The existing soils are generally silty sand. Slopes at the sites are typically flatter than 2 percent with scattered waste piles from dumping vegetative debris. A runoff coefficient, C, of 0.15 is appropriate for the existing conditions.

Thirty acres of the site are to be cleared as part of the site preparation, with approximately 25 acres covered as part of the landfill remedial action. While the soil cover will raise the ground elevation slightly (up to several feet), the soil cover will be of uniform thickness and generally follow the existing grades. No contouring of the soil cover to facilitate drainage beyond the natural contour is planned; however, some fill will be added to minimize having any ponded areas after placement of the cover. The soil cover material is

a sandy and silty sand material from a nearby borrow source and will be seeded after the soil cover is brought to final grade. Future use of the site is unclear—the site may be used for a recreational field, extension of the golf course, or be allowed to return to natural growth. Upon completion of the landfill soil cover, a runoff coefficient, C, of 0.25 is appropriate for the site. Existing drainage patterns at the site are described below and will not be significantly altered by the described work.

1.3.2 Contaminated Soil Removal Areas

The two areas (north of fairway for Hole No. 3 and north of fairway for Hole No. 7) are each about 0.6 acres in size. The area north of fairway for Hole No. 3 is in the "rough area", and is silty sand soils vegetated with grass. Slopes vary from flat to about 5:1 (H:V), with drainage flowing to the pond along the north side of the area. Existing and future runoff coefficient, C, are about 0.25.

The area north of fairway for Hole No. 7 is in an area of trees, brush, and grass. The slope in the area varies from nearly flat to about 4:1, and soil in the area is silty sand. Following remediation, grass will be planted in the area. Slopes will be the same as at present. A runoff coefficient, C, of 0.25 is appropriate for conditions both before and after remediation. All drainage from the site flows to the pond at the northeastern edge of the site.

1.4 SITE MAP AND DRAINAGE PATTERNS

A site map with drainage patterns for the southern portion of McCoy Annex is shown on Figure 1 in Appendix C. The landfill soil cover area and the two contaminated soil removal areas are shown on the figure. The following description of the site topography and surface water hydrology is taken from the *Remedial Investigation Report* dated January 1999, prepared by Tetra Tech NUS, Inc.

The land surface across most of the McCoy Annex is generally flat with a few small isolated depressions. The surface elevation across the site is approximately 90 ft above sea level, with a gentle downward slope to the east.

Surface water drainage at the McCoy Annex is controlled by a series of drainage canals, ditches, and ponds located in and around the McCoy Annex. Well-defined drainage canals are located along the eastern and portions of the southern and western boundaries (see Figure 1, Appendix C). The drainage canal along the southern boundary interconnects with the golf course ponds and a canal located along the eastern boundary of the southern portion of the site. A poorly defined drainage ditch is also located along the southern boundary, parallel to Boggy Creek Road.

Surface water runoff from the golf course area is to the southeast through a series of ponds, interconnected bodies of water, and low lying marshy areas where water tends to pond during rainfall and is directed to the two canals that eventually merge near the southeast corner of the complex. Water from the canals eventually flows to a storm water drainage ditch located in the median of Tradeport Drive. Runoff from the western portion of the golf course is directed to the canal locate along the southern portion of the annex. This canal flows south and eventually drains into Lake Gillooly located east of the intersection of Boggy Creek Road and Tradeport Drive. Surface water runoff along the southern boundary of the site also flows into this lake.

Drainage within the southern portion of the site adjacent to the planned additional soil cover area is poorly defined, with few apparent water pathways.

2.0 STORM WATER MANAGEMENT AND POLLUTION CONTROLS

2.1 EROSION AND SEDIMENT CONTROLS

Grading and spreading of soil cover at the McCoy Annex Landfill and the areas on the golf course will create a potential for erosion, most prominent when the final grade is achieved and before the placement of sod or seed. All controls shall be consistent with the requirements set forth in the State Water Policy of Florida [Florida Administrative Code (FAC), Chapter 62-40], the guidelines contained in the *Florida Development Manual: A Guide to Sound Land and Water Management* (FDEP 1988), and any subsequent revisions. Erosion at these sites will be mitigated through implementation of the following temporary and permanent erosion and sediment controls:

- Silt Fence: Prefabricated commercial silt fence will be installed at appropriate boundaries of the project area to reduce runoff velocity and effect deposition of the transported sediment load. Silt fence will be used for erosion control until the construction area has been permanently stabilized with turf.
- Straw Bale Dike: Straw bale dikes may be installed along appropriate limits of the project area to reduce runoff velocity and to effect deposition of the transported sediment load.
- Jute: Jute or soil stabilization and improved slope stability will be placed as required on high erosion potential slopes. Blankets will lap over onto adjacent areas beyond the toe of the slope to prevent scour at the slope base.
- Turf Establishment: Turf establishment will be with sod or seed/fertilizer/mulch. The type of grass used will be coordinated with the golf course operator to ensure compatibility with existing grasses. Sod may be used on disturbed areas that are part of the fairway or on erosion areas. Application rate for seed and fertilizer will be 10 pounds per 1,000 ft^2.
- Perimeter Controls: Perimeter controls for the sites will be installed where shown on Figure 1, Appendix C before the beginning of soil cover installation. Perimeter controls will be actively maintained until final stabilization of those portions of the site upward of the perimeter control. Temporary perimeter controls will be removed after final stabilization.

2.2 STORM WATER MANAGEMENT

Storm water management controls shall be consistent with the requirements set forth in the State Water Policy of Florida (FAC Chapter 62-40) and the guidelines contained in the Florida Development Manual: *A Guide to Sound Land and Water Management* (FDEP 1988).

Where field engineering judgement dictates, storm water management practices may include storm water detention structures (including wet ponds); flow attenuation by use of open vegetated swales and natural depressions; infiltration of runoff onsite; and sequential systems (which combine several practices). Pursuant to the requirements of FAC Section 62-40.432, the storm water management system shall be designed to remove at least 80 percent of the average annual load of pollutants which cause or contribute to violations of water quality standards.

Velocity dissipation devices will be placed at discharge locations and along the length of any outfall channel for the purpose of providing a non-erosive velocity flow from the structure to a water course so the natural physical and biological characteristics and functions are maintained and protected (e.g., no significant changes in the hydrological regime of the receiving water). Equalization of the predevelopment and post-development storm water peak discharge rate and volume shall be a goal in the design of the post-development storm water management system.

2.3 WASTE DISPOSAL

All non-hazardous waste materials (construction debris) will be disposed at a designated off-base disposal site. No hazardous wastes are expected to be generated from the excavation of contaminated soils from fairways for Hole No. 3 and 7 or placement of the soil covers.

Offsite vehicle tracking of sediments and the generation of dust shall be minimized.

Proper application rates and methods for the use of fertilizers will be implemented to ensure the seed/sod placed at the site takes hold. Nutrients will be applied only at rates necessary to establish and maintain vegetation so discharges will not cause or contribute to violations of State surface or groundwater quality standards. The standards of practice in the turf industry for application of fertilizer will be adhered to.

No toxic substances are anticipated to be required at the job site. Any toxic substances, as well as all hazardous materials (hydraulic fluids, oils and fuels for heavy equipment, etc.) will be limited and such materials will be properly stored and disposed.

The Storm Water Pollution Prevention Plan must be amended to reflect any change applicable to protecting surface water resources in sediment and erosion site plans or site permits. Where Bechtel determines the SWPPP requires modification (for the duration of field activities), Bechtel will do so and provide copies to NTC and SOUTHDIV. After Bechtel demobilization from the site, required changes to the SWPPP will be made by SOUTHDIV.

2.4 MAINTENANCE

Erosion and sediment controls can become ineffective if they are damaged or not properly maintained. Maintenance of controls is a major part of an effective erosion and sediment control plan. The Work Plan provides for the installation of effective storm water controls during field construction activities. In conjunction with the inspection checklists (discussed below), storm water controls will be promptly repaired when necessary to ensure that such measures are kept in good and effective operating condition. After final stabilization of the site, remaining storm water controls necessary to prevent degradation of surface waters will be maintained for 3 years. Inspection reports will document repairs to storm water controls. Bechtel will perform this function while onsite at NTC Orlando, then will turn over responsibility for maintenance and inspections to the Navy.

2.5 INSPECTIONS

Qualified personnel shall inspect the following:

- All points of discharge into waters of the United States
- Area of discharge to a municipal separate storm sewer system
- All disturbed areas of the construction site not yet finally stabilized
- Areas used for storage of materials exposed to precipitation
- Structural control measures
- Locations where vehicles enter or exit the site

Inspections will occur at least once every 7 calendar days and within 24 hours of the end of a storm of 0.25 in. or greater. Where sites have been finally stabilized; such inspection shall be conducted at least once every month. At the conclusion of field activities, Navy base personnel will be responsible for inspections of storm water controls and mitigation measures.

Disturbed areas and areas used for storage of materials exposed to precipitation will be inspected for evidence of, or the potential for, pollutants entering the storm water system. The storm water management

system and erosion and sediment control measures identified will be observed to ensure they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in meeting the performance standards set forth in State Water Policy (FAC Chapter 62-40). Locations where vehicles enter or exit the site shall be inspected for evidence of sediment being tracked offsite.

Based on the results of the inspection, the site description identified in the plan and on pre-construction drawings will be revised as appropriate, but in no case later than 7 calendar days following the inspection. Such modifications shall provide for timely implementation of any changes to the plan within 7 calendar days following the inspection. Changes may be documented in Part 3 of the Inspection and Maintenance Form shown in Appendix B.

A report summarizing the scope of the inspection, name(s) and qualifications of personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the Storm Water Pollution Prevention Plan, and actions taken in accordance with the permit shall be made and retained as part of the storm water pollution prevention plan for at least 3 years from the date the site is finally stabilized. Such reports shall identify any incidents of non-compliance. Where a report does not identify any incidents of non-compliance, the report shall contain a certification the facility is in compliance with the storm water pollution prevention plan and this permit. The report shall be signed in accordance with Part VII.G of the Standard Permit Conditions attached in Appendix A to this plan.

2.6 NON-STORM WATER DISCHARGES

Except for flows from fire fighting activities, sources of non-storm water combined with storm water discharges associated with construction activity must be identified in the plan. To date, based on knowledge and information from site investigations performed by other governmental contractors, there are no non-storm water discharges associated with any of the work areas addressed by this plan.

3.0 RETENTION OF RECORDS

The permittee (NTC Orlando and SOUTHDIV) will retain copies of Storm water Pollution Prevention Plans and all reports required by this permit, and records of all data used to complete the Notice of Intent to be covered by this permit, for a period of at least three years from the date the site is finally stabilized. Bechtel will provide all records, including inspection reports, prepared during the implementation of field activities.

The permittee (NTC Orlando and SOUTHDIV) shall retain a copy of the Storm water Pollution Prevention Plan at NTC Orlando from the date of project initiation to the date of final stabilization.

Correspondence

Except for the submittal of NOIs and NOTs (Notice of Intent and Notice of Termination), all written correspondence directed to the U.S. Environmental Protection Agency concerning discharges in the State of Florida, and subject to coverage under this permit, including the submittal of individual permit applications, shall be sent to the address listed below:

U.S. EPA, Region 4
Surface Water Permits Section
Water Management Division
Atlanta Federal Center
61 Forsyth St., SW
Atlanta, GA 30303

REFERENCES

EPA (U.S. Environmental Protection Agency), 1998. National Discharge Elimination System (NPDES) General Permit for Storm water Discharges from Construction Activities. 63FR15621.

FDEP (Florida Department of Environmental Protection), 1988. *Florida Development Manual: A Guide to Sound Land and Water Management.*

Tetra Tech NUS, Inc., 1999. *Remedial Investigation Report, Operable Unit 2, McCoy Anney Landfill, Naval Training Center Orlando, Florida.* Comprehensive Long-Term Environmental Action Navy (CLEAN) Contract.

APPENDIX A

STANDARD PERMIT CONDITIONS

APPENDIX A

Standard Permit Conditions
63 FR 15621, March 31, 1998

A. Duty To Comply

1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the CWA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

2. Penalties for Violations of Permit Conditions.

a. Criminal. (1) Negligent Violations. The CWA provides any person who negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than 1 year, or both.

(2) Knowing Violations. The CWA provides any person who knowingly violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a fine of not less than $5,000 nor more than $50,000 per day of violation, or by imprisonment for not more than 3 years, or both.

(3) Knowing Endangerment. The CWA provides any person who knowingly violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act and who knows at the time he is placing another person in imminent danger of death or serious bodily injury is subject to a fine of not more than $250,000, or by imprisonment for not more than 15 years, or both.

(4). False Statement. The CWA provides any person who knowingly makes any false material statement, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained under the Act or who knowingly falsifies, tampers with, or renders inaccurate, any monitoring device or method required to be maintained under the Act,
shall upon conviction, be punished by a fine of not more than $10,000 or by imprisonment for not more than 2 years, or by both. If a conviction is for a violation committed after a first conviction of such person under this paragraph, punishment shall be by a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or by both. (See Section 309.c.4 of the Clean Water Act).

b. Civil Penalties--The CWA provides any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a civil penalty not to exceed $25,000 per day for each violation.

c. Administrative Penalties--The CWA provides any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to an administrative penalty, as follows:

(1) Class I penalty. Not to exceed $10,000 per violation nor shall the maximum amount exceed $25,000.

(2) Class II penalty. Not to exceed $10,000 per day for each day during which the violation continues nor shall the maximum amount exceed $125,000.

B. Continuation of the Expired General Permit

This permit expires at midnight 5 years from April 3, 1998. If this general permit is not reissued prior to its expiration date, all facilities desiring to retain continued coverage shall submit another NOI form prior to the expiration of this permit. This submittal shall also satisfy the notification requirement to be covered under the reissued permit. Facilities have not obtained coverage under this permit by the expiration date of this permit cannot become authorized to discharge under the continued permit.

The authorization to discharge under the continued previous general permit, issued on September 25, 1992 (57 FR 44412), expires 90 days from April 3, 1998.

C. Need To Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action to claim it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. Duty To Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

E. Duty To Provide Information

The permittee shall furnish within a reasonable time to the Director; an authorized representative of the Director; a State or local agency approving sediment and erosion plans, grading plans, or storm water management plans; or in the case of a storm water discharge associated with industrial activity which discharges through a municipal separate storm sewer system with an NPDES permit, to the municipal operator of the system, any information which is requested to determine compliance with this permit or other information.

F. Other Information

When the permittee becomes aware he or she failed to submit any relevant facts or submitted incorrect information in the Notice of Intent or in any other report to the Director, he or she shall promptly submit such facts or information.

G. Signatory Requirements

All Notices of Intent, storm water pollution prevention plans, reports, certifications or information either submitted to the Director or the operator of a large or medium municipal separate storm sewer system, or required by this permit to be maintained by the permittee, shall be signed as follows:

1. All Notices of Intent shall be signed as follows:

a. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (1) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or (2) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25,000,000 (in second-quarter 1980 dollars) if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

b. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

c. For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes (1) the chief executive officer of the agency, or (2) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

2. All reports required by the permit and other information requested by the Director or authorized representative of the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

a. The authorization is made in writing by a person described above and submitted to the Director.

b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of manager, operator, superintendent, or position of equivalent responsibility or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)

c. Changes to authorization. If an authorization under paragraph II.B.3. is no longer accurate because a different operator has responsibility for the overall operation of the construction site, a new notice of intent satisfying the requirements of paragraph II.B. must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

d. Certification. Any person signing documents under paragraph VI.G shall make the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

H. Penalties for Falsification of Reports

Section 309(c)(4) of the Clean Water Act provides that any person who knowingly makes any false material statement, representation, or certification in any record or other document submitted or required to be maintained

under this permit, including reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or by both.

I. Penalties for Falsification of Monitoring Systems

The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

J. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under section 311 of the CWA or section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

K. Property Rights

The issuance of this permit does not convey any property rights of any sort, nor any exclusive privileges, nor does it authorize any injury to private property nor any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

L. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

M. Transfers

Coverage under this permit is not transferable to any person except after notice to the Director. The Director may require termination of permit coverage by the current permittee in accordance with Part IX of this permit; and the subsequent submission a Notice of Intent to receive coverage under the permit by the new applicant in accordance with Part II of this permit.

N. Requiring an Individual Permit or an Alternative General Permit

1. The Director may require any person authorized by this permit to apply for and/or obtain either an individual NPDES permit or an alternative NPDES general permit. Any interested person may petition the Director to take action under this paragraph. Where the Director requires a discharger authorized to discharge under this permit to apply for an individual NPDES permit, the Director shall notify the discharger in writing that a permit application is required. This notification shall include a brief statement of the reasons for this decision, an application form, a statement setting a deadline for the discharger to file the application, and a statement that on the effective date of issuance or denial of the individual NPDES permit or the alternative general permit as it applies to the individual permittee, coverage under this general permit shall automatically terminate. Applications shall be submitted to the appropriate Regional Office indicated in Part V.C of this permit. The Director may grant additional time to submit the application upon request of the applicant. If a discharger fails to submit in a timely manner an individual NPDES permit application as required by the Director under this paragraph, then the applicability of this permit to the individual NPDES permittee is automatically terminated at the end of the day specified by the Director for application submittal.

2. Any discharger authorized by this permit may request to be excluded from the coverage of this permit by applying for an individual permit. In such cases, the permittee shall submit an individual application in accordance with the requirements of 40 CFR 122.26(c)(1)(ii), with reasons supporting the request, to the Director at the address for the appropriate Regional Office indicated in Part V.C of this permit. The request may be granted by issuance of any individual permit or an alternative general permit if the reasons cited by the permittee are adequate to support the request.

3. When an individual NPDES permit is issued to a discharger otherwise subject to this permit, or the discharger is authorized to discharge under an alternative NPDES general permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the effective date of the individual permit or the date of authorization of coverage under the alternative general permit, whichever the case may be. When an individual

NPDES permit is denied to an owner or operator otherwise subject to this permit, or the owner or operator is denied for coverage under an alternative NPDES general permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the date of such denial, unless otherwise specified by the Director.

O. State/Environmental Laws

1. Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by section 510 of the Act.

2. No condition of this permit shall release the permittee from any responsibility or requirements under other environmental statutes or regulations.

P. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit and with the requirements of storm water pollution prevention plans. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. Proper operation and maintenance requires the operation of backup or auxiliary facilities or similar systems, installed by a permittee only when necessary to achieve compliance with the conditions of the permit.

Q. Inspection and Entry

The permittee shall allow the Director or an authorized representative of EPA, the State, or, in the case of a construction site which discharges through a municipal separate storm sewer, an authorized representative of the municipal operator or the separate storm sewer receiving the discharge, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit;

2. Have access to and copy at reasonable times, any records that must be kept under the conditions of this permit;

3. Inspect at reasonable times any facilities or equipment (including monitoring and control equipment); and

4. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the CWA, any substances or parameter at any location on the site.

R. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

S. Planned Changes

The permittee shall amend the pollution prevention plan as soon as possible identifying any planned physical alterations or additions to the permitted facility.

T. Twenty-Four Hour Reporting

(1) the permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause: the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

U. Bypass

(1) Definitions.

(i) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

(ii) Severe property damage means substantial physical damage to property which causes them to become inoperable or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

(2) Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs S(3) and S(4).

(3) Notice.

(i) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(ii) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in paragraph R. of this section (24-hour notice).

(4) Prohibition of bypass.

(i) Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:

(A) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(B) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(C) the permittee submitted notices as required under paragraph S(3) of this section.

(ii) The Director may approve an anticipated bypass after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in paragraph S(4)(i) of this section.

Part VIII. Reopener Clause

A. If there is evidence indicating potential or realized impacts on water quality due to any storm water discharge associated with industrial activity covered by this permit, the discharger may be required to obtain individual permit or an alternative general permit in accordance with Part I.C of this permit or the permit may be modified to include different limitations and/or requirements.

B. Permit modification or revocation will be conducted according to 40 CFR 122.62, 122.63, 122.64 and 124.5.

C. This permit may be modified, or alternatively, revoked and reissued, to comply with any applicable provisions of the Phase II storm water regulations once they are issued.

Part IX. Termination of Coverage

A. Notice of Termination. Where a site has been finally stabilized and all storm water discharges from construction sites that are authorized by this permit are eliminated (see Part IX.A.5. for the definition of eliminated), or where the operator of all storm water discharges at a facility changes, the operator of the facility may submit a Notice of Termination that is signed in accordance with Part VII.G of this permit within 14 days of final stabilization of the site. The Notice of Termination shall include the following information:

1. The mailing address, and location of the construction site for which the notification is submitted. Where a mailing address for the site is not available, the location can be described in terms of the latitude and longitude of the approximate center of the facility to the nearest 15 seconds, or the section, township and range to the nearest quarter section;

2. The name, address, and telephone number of the operator seeking termination of permit coverage;

3. The NPDES permit number for the storm water discharge identified by this Notice of Termination;

4. An identification of whether the storm water discharges associated with industrial activity have been eliminated or the operator of the discharges has changed; and

5. The following certification signed in accordance with Part VII.G (signatory requirements) of this permit:

> I certify under penalty of law that all storm water discharges associated with industrial activity from the identified facility that are authorized by a NPDES general permit have otherwise been eliminated or that I am no longer the operator of the facility or construction site. I understand that by submitting this notice of termination, that I am no longer authorized to discharge storm water associated with industrial activity by the general permit, and that discharging pollutants in storm water associated with industrial activity to waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by a NPDES permit. I also understand that the submittal of this notice of termination does not release an operator from liability for any violations of this permit or the Clean Water Act.

For the purposes of this certification, elimination of storm water discharges associated with construction activity means that all disturbed soils at the identified facility have been finally stabilized and temporary erosion and sediment control measures have been removed or will be removed at an appropriate time, or that all storm water discharges associated with construction activities from the identified site that are authorized by a NPDES general permit have otherwise been eliminated.

B. Where to Submit. Currently, applicants may use the NOT form published in the September 29, 1995 Federal Register (60 FR 51265). The final version of the NOT form proposed in the June 2, 1997 Federal Register (62 FR 29785) shall be used when published in the Federal Register. All Notices of Termination are to be sent, using the form provided by the Director (or a photocopy thereof), to the following address: Storm Water Notice of Termination (4203), 401 M Street, SW, Washington, DC 20460.

C. Additional Notification. A copy of the Notice of Termination shall be sent to the State agency which issued the State storm water or environmental resource permit for the site and, if the storm water management system discharges to a municipal separate storm sewer system within Broward, Dade, Duval, Escambia, Hillsborough, Lee, Leon, Manatee, Orange, Palm Beach, Pasco, Pinellas, Polk, Sarasota or Seminole Counties, to the owner of that system. Included within these counties, the Florida Department of Transportation (FDOT), incorporated municipalities, and chapter 298 Special Districts also shall be notified where they own or operate a municipal separate storm sewer system receiving storm water discharges associated with construction activity covered by this permit.

APPENDIX B

Forms:

1. Contractors Certification
2. Inspection and Maintenance Form

CONTRACTOR'S CERTIFICATION

I certify under penalty of law that I understand the terms and conditions of the general National Pollution Discharge Elimination System (NPDES) permit that authorizes the stormwater discharges associated with construction activity from the construction site identified as part of this construction certification.

_____	_____
Signature Commanding Officer (or designee) NTC Orlando, Florida	Date
_____	_____
Signature Bechtel Environmental, Inc. Navy Response Action Contractor	Title/Date

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: _____ DATE: _____

INSPECTOR'S TITLE:

_____

DAYS SINCE LAST RAINFALL: _____ AMOUNT OF LAST RAINFALL: _____ INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION

STABILIZATION REQUIRED:

_____

_____

_____

_____

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORMWATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: _____ DATE: _____

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

_____

_____

_____

STRAW BALE DIKES:

_____

_____

_____

EROSION CONTROL/REVEGATION MATTING:

_____

_____

_____

TURF:

_____

_____

_____

STORMWATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

_____
_____
_____
_____
_____
_____

REASON FOR CHANGES:

_____
_____
_____
_____
_____
_____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

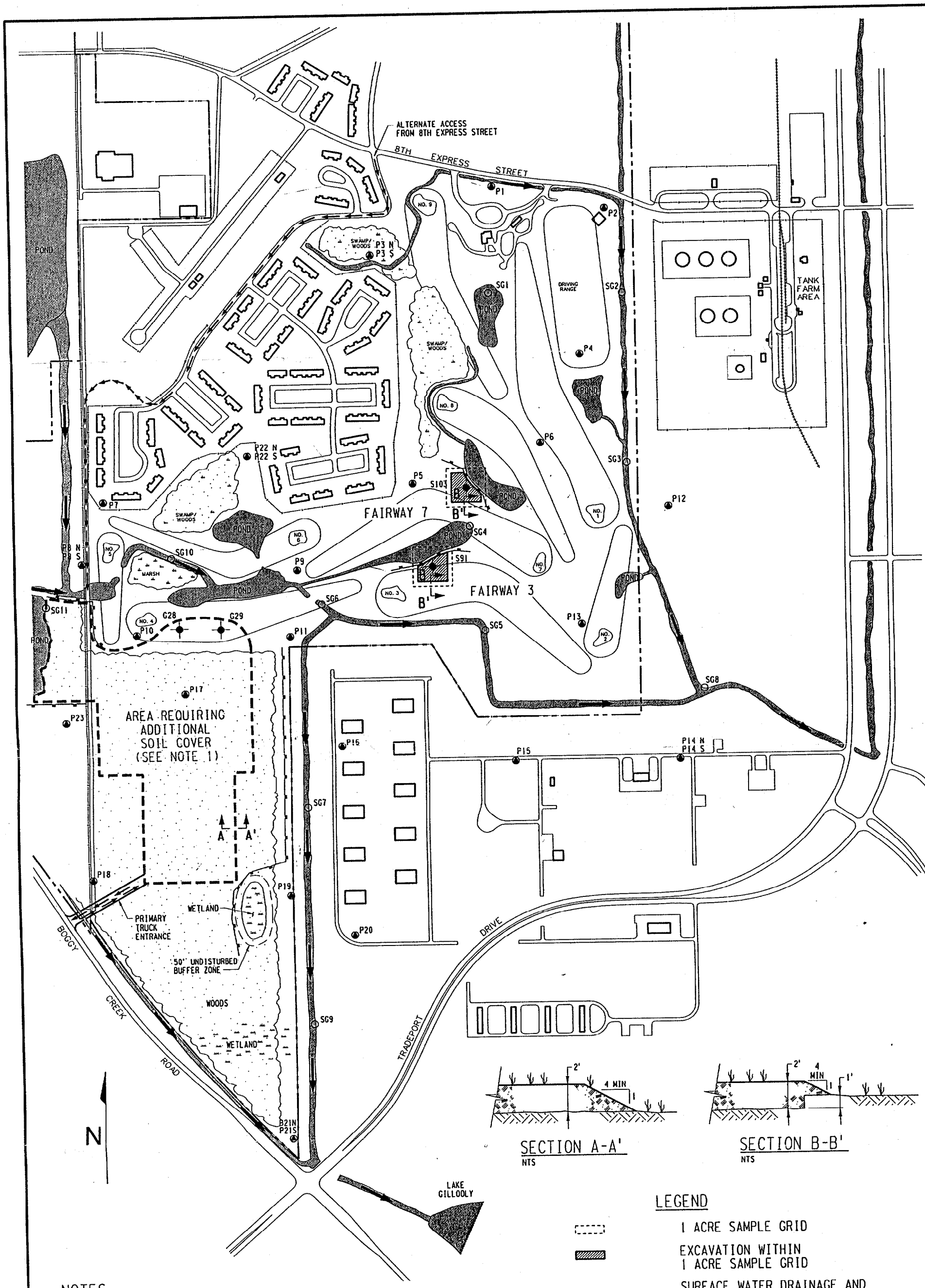
SIGNATURE: _____

TITLE: _____

DATE: _____

APPENDIX C

MCCOY ANNEX LANDFILL
SITE MAP
AND
DRAINAGE PATTERNS



NOTES

1. APPROXIMATE LOCATION OF AREA REQUIRING ADDITIONAL SOIL COVER IS LAT. 28°25'10" LONG. 81°20'44". BOTH LATITUDE AND LONGITUDE WERE DERIVED FROM THE PINE CASTLE QUADRANGLE, FLORIDA - ORANGE COUNTY USGS SURVEY MAP.

0 500 1000
SCALE IN FEET

22567 305 305F004.DGN

Figure 1
Site Map and Drainage Pattern

00436E022

305-000021

CITY OF ORLANDO

OFFICE OF PERMITTING SERVICES

April 22, 1999

Mr William Hevrdeys
Bechtel Environmental Inc
PO Box 350
Oak Ridge, TN 37831-0350

Dear Mr Hevrdeys:

This letter is in response to your letter of April 9, 1999 concerning Bechtel Job Number 22567, **Planned McCoy Annex Landfill Cover Project**. I have reviewed your draft work plan and Stormwater Pollution Prevention Plan (SWPPP) and have determined that the project *substantially* meets the City of Orlando's permit requirements except for one item.

You stated in your work plan your intention to increase the imperviousness of the landfill cover from C=0.15 to C=0.25. Normally the city would require stormwater pollution abatement (retention) and attenuation (detention) to protect downstream areas from decreased water quality and increased runoff. However, after discussions with the City Engineer, the retention and detention requirements will be waived for this project with the understanding that any future development on this site must meet the current City standards for stormwater management, including both retention and detention.

If you have any questions or require further information, please contact me at 407-246-3807.

Sincerely,

Erik Lervaag PE
Civil Engineer III

Cc: Richard M Howard PE, City Engineer
Dayna M Walters, Development Review Services Manager
Bruce G Hossfield, Senior Planner

305-000040

BUILDING A CENTURY 1898 BECHTEL 1998

APR 22 1999

Mr. Bill Claypool
Engineering Department
Orange County Public Works Complex
4200 South John Young Parkway
Orlando, FL 32839-9205

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
DO0107 PLANNED MCCOY ANNEX LANDFILL COVER PROJECT
NAS Pensacola, Florida
Subject Code: 5010

Dear Mr. Claypool:

Per your discussion with Mr. Richard Atwood of our office on April 21, 1999, Bechtel is trying to determine what portions of planned construction work at the Naval Training Center in Orlando may be within the boundaries of Orange County. In order to avoid any impacts to our construction schedule, Bechtel is going to assume that the project areas outside of the NTC Orlando fence line are in Orange County.

Bechtel is enclosing a copy of the approved work plan for the McCoy Annex Landfill Cover Project. We are also enclosing a copy of the Storm Water Notice of Intent (NOI) that has been filed with EPA Region IV to demonstrate substantive compliance with the NPDES storm water permitting requirements for land disturbing activities greater than 5 acres. Bechtel Environmental, Inc. is submitting these documents on behalf of the Commanding Officer, United States Navy, Naval Training Station, Orlando, Florida.

This project is being conducted under the jurisdiction of the Comprehensive Environmental Restoration, Compensation, and Liability Act (CERCLA), also known as the Superfund program. CERCLA provides in Section 121(e) of the Act, that no federal, state, or local permits are required to be obtained by the agency conducting the project. However, the law does require that any *substantive* requirements that would otherwise be contained in a permit must be implemented during the project.

BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

Mr. Atwood discussed with you the fact that the documents enclosed have already been reviewed by Mr. Eric Lervaag, Office of Permitting Services, City of Orlando. The City has had some comments regarding stormwater runoff controls, maintaining equality between pre- and post-construction drainage coefficients, drainage culverts, and driveway entrance specifications. Bechtel is addressing those specific concerns and we can provide documentation of those issues and our responses if necessary.

We are requesting that your office review the enclosed work plan and Storm Water NOI. If there are any design requirements that the County believes should be met during field construction activities (that would otherwise be contained in permit conditions in a county-issued permit), please identify those requirements by April 28, 1999, so that Bechtel may make provisions to implement them during field construction.

I recognize that we have asked for a very short turnaround time, but apparently the location of this project is right on the boundary between the City and County and has made the jurisdictional decision a difficult one. If you have any questions or need additional information, please contact me or Mr. Atwood at (423) 220-2406.

Sincerely,

Robin Manning
Project Engineer

RA:ch:Lr1811

Enclosures: As stated

cc: Lt. G. Whipple, NTC Orlando
B. Nwokike, SDIV
W. Hansel, SDIV
N. Rodriguez, EPA Region IV
D. Grabka, FDEP
S. McCoy, Tetra-Tech NUS

305-000028

BECHTEL ENVIRONMENTAL, INC

TELEPHONE CALL

By:	Richard Atwood	**Of:**	Navy RAC	**Route/Copy**	B. Hevrdeys R. Manning
To:	Mr. Bill Claypool	**Of:**	Orange County Florida, Permitting Affairs Department		
Date:	5/12/99	**Time:**	1:33 PM		
Subject:	Boggy Creek Road Driveway Access Requirements for McCoy Annex Landfill Cover Project			**Job No:**	22567 305
				File:	3180, 7550, 7630, 7440

I called Mr. Claypool, (407) 836-7900, to inquire whether he and the Orange County Permitting Affairs and/or Engineering Departments had a chance to review the correspondence and figures that Bechtel sent to the County on April 22, 1999. Mr. Claypool indicated that he had received the information. Mr. Claypool requested a determination from Pat Beeman (Roads and Drainage Department) on whether the parcel of land that Bechtel had questions on was located in the City or County.

The parcel outside the Navy fence line in the northwest corner of the project boundary is in the county, not the city. However, given the limited nature of the activity, Mr. Claypool is expecting and recommending no involvement by the county and anticipating that no substantive permitting requirements will apply to the Bechtel scope of work. He has raised the issue of county participation to his supervisor for a final determination.

Mr. Claypool was able to provide final direction to Bechtel regarding the question of applicable requirements for the driveway access road that Bechtel will be installing from the NTC to Boggy Creek Road. Orange County has an agreement with the City of Orlando that the City is responsible for all driveway access issues. Bechtel has already contacted the City on this issue, and obtained a copy of the driveway detail required by the City for this construction. Bechtel has already begun planning the installation of the access route based on the City detail, and my conversation with Mr. Claypool confirms Bechtel has identified the correct requirements.

305-000046

AUG 25 1999

Commanding Officer
Department of Navy, Southern Division
Naval Facilities Engineering Command
Attention: Barbara Nwokike
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC 29419-9010

SUBJECT: Bechtel Job No. 22567
Department of Navy Contract No. N62467-93-D-0936
DELIVERY ORDER 107, McCOY ANNEX LANDFILL IRA
STORMWATER POLLUTION PREVENTION PLAN
NAVAL TRAINING CENTER, ORLANDO, FLORIDA
File code: 7550

Dear Ms. Nwokike:

We are transmitting to you the Inspection and Maintenance Record for the Interim Remedial Action at the McCoy Annex Landfill Site. This record was prepared in accordance with the requirements of the Storm Water Pollution Prevention Plan signed by the Navy in April of 1999. The continuing inspection requirements are required under the terms of the NPDES General Permit for Storm Water Discharges Associated with Construction Activity. This permit is required for grading projects that disturb greater than 5 acres of land. In accordance with the Section 121(e) permitting exemption under CERCLA, the Navy does not have to obtain the NPDES permit but must meet the substantive requirements of the permit. These requirements include the preparation of the previously referenced plan and maintenance of inspection records.

Enclosed are both the Inspection and Maintenance Record and a copy of the Storm Water Pollution Prevention Plan. Requirements for inspection and maintenance of erosion controls are described in the plan. The Inspection and Maintenance Record is complete up to the last site visit by Bechtel on August 12, 1999. In general, the site is to be inspected weekly during active construction periods and prior to final stabilization of the soil cover. It is also to be inspected within 24 hours of major rainfall events. Sites that have been stabilized only require a monthly inspection.

During the August 12, 1999 site visit, we noted two areas of localized erosion of the cover (one area each at S103 and S91). Bechtel is making plans to repair the gullies at these locations and restore the sod that was damaged by the erosion. Once this is accomplished and vegetative cover becomes fully established over the remainder of the project site, it should be possible to inspect at a monthly frequency. Please note that the Navy (or your designee) will have the responsibility to perform weekly inspections and maintain erosion control features during the next phase of cover placement on this site.

BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

305-000046

If you have any questions about the storm water management issues, please do not hesitate to call me at (423) 220-2406.

Sincerely

J. R. Manning

J. Robin Manning
Project Engineer

Enclosures: As Stated

cc: Mr. Wayne Hansel, SOUTHDIV (wo/attachments)
cc: Mr. Jerry Eggebrecht, REICC, Orlando (wo/attachments)

NAVAL TRAINING CENTER ORLANDO
McCOY ANNEX LANDFILL
INTERIM REMEDIAL ACTION

STORMWATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE RECORDS

Department of the Navy, Southern Division
Naval Facilities Engineering Command

STORM WATER POLLUTION PREVENTION PLAN

WKLY INSPECTION

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: William Hevroeys DATE: April 26, 1999 Initial Report.

INSPECTOR'S TITLE: Proj. Supt. / Site QC Representative

DAYS SINCE LAST RAINFALL: N.A. AMOUNT OF LAST RAINFALL: N.A. INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Cover Area	4/22/99 ①	Yes	Silt Fencing	Good
S103	N.A			
S91	N.A			

STABILIZATION REQUIRED:
Installed Silt Fencing on Down Gradient side of slopes to capture sediments from storm water run-off.

TO BE PERFORMED BY: Bechtel Env. Inc.
ON OR BEFORE: 4/22/99 — Completed.

① Completed installation of Silt Fence

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: William Hevrdeys DATE: April 26, 1999

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
E side of Landfill Cover Area - Good Condition, NE Corner of Landfill Cover Area - Good Condition, N of Fairway #4 - Good Condition.

STRAW BALE DIKES:
None

EROSION CONTROL/REVEGATION MATTING:
None

TURF:
None

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

ADD TO FIGURE 1, SILT FENCE LOCATED NORTH OF FAIRWAY #4

REASON FOR CHANGES:

SILT FENCE N. OF FAIRWAY #4 REQUIRED BECAUSE OF THE GRADE CHANGE IN THE AREA HAS DRAINAGE GOING TO THE NORTH.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: William Lindsey

TITLE: PROJ. SUPT. / SITE QC REP.

DATE: APRIL 26, 1999

STORM WATER POLLUTION PREVENTION PLAN

RAIN EVENT on 4/28/99

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING ~~CONSTRUCTION~~
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: William Hevrdeys DATE: April 29, 1999

INSPECTOR'S TITLE: Proj. Supt / QC Site Rep.

DAYS SINCE LAST RAINFALL: >7 days AMOUNT OF LAST RAINFALL: 2" INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Landfill Cover Area	4/29/99	Yes	Silt Fencing	Good
S103	4/29/99	Yes	Silt Fencing	Good
S91	N.A.	→	→	→

STABILIZATION REQUIRED:

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: William Heyrdeys DATE: April 29, 1999

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
E. Side Lndfill Cover Area - Good condition, NE corner of Lndfill Cover Area - Good condition, N. of Fairway #4 - Good condition, Excavation Area SI03 - Good condition

STRAW BALE DIKES:
None

EROSION CONTROL/REVEGATION MATTING:
None

TURF:
None

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

REASON FOR CHANGES:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: William Hundley

TITLE: PROJ. SUPT. / SITE QC. REP

DATE: APRIL 29, 1999

STORM WATER POLLUTION PREVENTION PLAN

Rain Event on 4-29-99

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: April 30, 99

INSPECTOR'S TITLE: Field / Supv.

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: ½ INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Landfill Cover	4-29-99	yes	Silt Fence	good
S 163	4-29-99	yes	Silt Fencing	good
S 91	NA			

STABILIZATION REQUIRED:

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 4-30-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
East Side landfill Cover Area - Good Condition, NE Corner of landfill Area Good N of Fairway #4 Good Condition, Excavated Area S/03 Good Condition

STRAW BALE DIKES:
None

EROSION CONTROL/REVEGATION MATTING:
None

TURF:
None

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: Ron Bardman

TITLE: Fld Supt

DATE: 4-30-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 5-4-99

INSPECTOR'S TITLE: Field Supt.

DAYS SINCE LAST RAINFALL: 5 AMOUNT OF LAST RAINFALL: 1/2 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Hand fill Coverage Area	4-29-99	Yes	silt Fencing	good
S103	4-29-99	Yes	Silt Fencing	good
S91	NA			

STABILIZATION REQUIRED:

Yes, Approx 10' N. of Fairway 4, 5' of silt fence needs stabilization

TO BE PERFORMED BY: R. Boardman
ON OR BEFORE: 5-6-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: R. Beardsley DATE: 5-4-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

10' North of fairway 4 needs restabilization
Approx 20' South off hand fill, silt fence around
wetlands has been knocked down by unknown persons
over the weekend

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: Ron Boardman

TITLE: Field Supt.

DATE: 5-4-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: R. Boardman DATE: 5-7-99

INSPECTOR'S TITLE: FLD Supt

DAYS SINCE LAST RAINFALL: 6 AMOUNT OF LAST RAINFALL: 1/2 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Landfill coverage Area	5-4-99	Yes	Silt fence	Good
S103	5-4-99	Yes	Silt Fence	Good
S91	NA			

STABILIZATION REQUIRED:
NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

000046-1

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: R. Boardman DATE: 5-7-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

NA

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R. Beardsley

TITLE: Fld. Supt.

DATE: 5-7-99

STORM WATER POLLUTION PREVENTION PLAN

weekly

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: R. Boardman DATE: 5-11-99

INSPECTOR'S TITLE: Field Supt. Rain 5/8 & 5/9-99 unk amount

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: unk INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	5-8 & 5-9	yes	silt fence	good
S103	5-8 & 5-9	yes	silt fence	good
S91	NA			

STABILIZATION REQUIRED:
NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 5-14-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

NA

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R. Bowman

TITLE: Field Supt

DATE: 5-14-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 5-17-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 3 AMOUNT OF LAST RAINFALL: 1" INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land fill Coverage Area	5-14	yes	Silt fence	good
S103	5-14	yes	Silt fence	good
S91	5-14	yes	Silt fence	good

STABILIZATION REQUIRED:
S91 - 10' of east end of S91

TO BE PERFORMED BY: Ron Boardman
ON OR BEFORE: 5-18-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 5-17-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
10' East end of 591 extra pegs Required

STRAW BALE DIKES:
NA

EROSION CONTROL/REVEGATION MATTING:
NA

TURF:
NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

N/A

REASON FOR CHANGES:

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R. Burlow

TITLE: Field Supt.

DATE: 5-17-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 5-28-99

INSPECTOR'S TITLE: Field Supt.

DAYS SINCE LAST RAINFALL: 5-26 AMOUNT OF LAST RAINFALL: 1/8 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	5-14	yes	Silt Fence	good
S103	5-27	no	Silt Fence	FAIR
S91	5-27	no	Silt Fence	FAIR

STABILIZATION REQUIRED:
Silt Fence needs Repair due to Backfilling of S103 & S91

TO BE PERFORMED BY: Ron Boardman
ON OR BEFORE: 6-4

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 5-28-95

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

Silt Fence Around water's edge needs Repair Due to Backfilling operations, required Action will be to Reinforces Steaks and Straighten up.

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: [signature]

TITLE: Field Supt

DATE: 5-28-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 6-4-99

INSPECTOR'S TITLE: Field Supt.

DAYS SINCE LAST RAINFALL: 5-26 AMOUNT OF LAST RAINFALL: 2 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Landfill Coverage Area	5-14	yes	Silt fence	good
S103	5-27	yes	Silt fence	good
S91	5-27	yes	Silt fence	good

STABILIZATION REQUIRED:
NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 6-4-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

NA

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

N/A

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R. Barlow

TITLE: Field Supt.

DATE: 6-4-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 6-11-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: 2" INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	6-10	yes	Silt Fence	good
S103	6-8	Removed	sod Laid	Removed
S91	6-8	Removed	sod Laid	Removed.

STABILIZATION REQUIRED:
NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: R. Boardman DATE: 6-11-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

NA

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R. Bamman

TITLE: Field Supt

DATE: 6-11-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 6-17-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: 5 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
hand fill over Area	6-10	Yes	Silt Fence	Good.
AREA-B.	installed 6-16	yes	Silt Fenc	Good.

STABILIZATION REQUIRED:
needs some stabilization on North end
Heavy Rains & soil shift have caused fence
to lean.

TO BE PERFORMED BY: 6-19-99 John ORE
ON OR BEFORE: 6-19-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 6-17-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
Silt Fence on North End of Area B needs some propping up due to Loose Soil Conditions

STRAW BALE DIKES:
NA

EROSION CONTROL/REVEGATION MATTING:
NA

TURF:
NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: Don Barker

TITLE: Field Supt

DATE: 6-17-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 6-16-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: 1" INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	6-10	yes	Silt Fence	Good
Area - B	6-16	yes	Silt Fence	Good

STABILIZATION REQUIRED:

None

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 6-16-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

No Maintenance needed on Landfill
Repaired Silt fence on North End of Area B

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

N/A

REASON FOR CHANGES:

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: Ron Lowman

TITLE: Field Supt

DATE: 6-18-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 6-23-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 2 AMOUNT OF LAST RAINFALL: 1 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
LAND Fill Coverage Area	6-10	Yes	Silt Fence	Good
AREA B	6-16	Yes	Silt Fence	good

STABILIZATION REQUIRED: NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Dan Boardman DATE: 6-23-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
no action Required at this time

STRAW BALE DIKES:
NA

EROSION CONTROL/REVEGATION MATTING:
NA

TURF:
NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

N/A

REASON FOR CHANGES:

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: [signature]

TITLE: Field Supt

DATE: 6-23-99

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 7-1-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: 3/4" INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	6-10	Yes	Silt Fence	Good
Area B	6-16	Yes	Silt Fence	Good

STABILIZATION REQUIRED:
N/A

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Bowman DATE: 7-1-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

No Action Required at this Time

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: R Burden

TITLE: Field Supt.

DATE: 7-1-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 7-8-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 4 AMOUNT OF LAST RAINFALL: 7 ½ INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land Fill Coverage Area	6-10	yes	Silt Fence	good
Area B	6-16	yes	Silt Fence	good

STABILIZATION REQUIRED:

~~N/A~~ NA

TO BE PERFORMED BY: _____
ON OR BEFORE: _____

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 7-8-09

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

no action Required At this Time

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

NA

REASON FOR CHANGES:

NA

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: P. Bowman

TITLE: Field Supt (Bechtel)

DATE: 7-8-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: Ron Boardman DATE: 7-14-99

INSPECTOR'S TITLE: Field Supt

DAYS SINCE LAST RAINFALL: 10 AMOUNT OF LAST RAINFALL: 2 ½ INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Land fill Coverage Area	6-10	yes	Silt Fence	good
AREA B	6/16	yes	Silt Fence	good

STABILIZATION REQUIRED: No Stabilization Required But we Are reinforcing some of silt Fence steaks with ReBAR

TO BE PERFORMED BY: BoB Deas & R Boardman
ON OR BEFORE: 7-15-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: Ron Boardman DATE: 7-14-99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:

Some Steaks in silt fence required ReBAR instead of steaks no certain places just where ever they were went

STRAW BALE DIKES:

NA

EROSION CONTROL/REVEGATION MATTING:

NA

TURF:

NA

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

N/A

REASON FOR CHANGES:

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for known violations.

SIGNATURE: Ron Tucker

TITLE: Field Supt (Bechtel)

DATE: 7-14-99

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE FORM (PART 1 OF 3)

TO BE COMPLETED EVERY 7 DAYS DURING CONSTRUCTION
AND WITHIN 24 HOURS OF A RAINFALL EVENT OF 0.25 INCHES OR MORE -
COMPLETE MONTHLY AFTER CONSTRUCTION

INSPECTOR: J.R. Manning DATE: Aug. 12, 1999

INSPECTOR'S TITLE: Project Engineer

DAYS SINCE LAST RAINFALL: 1 AMOUNT OF LAST RAINFALL: <0.25 INCHES

STABILIZATION MEASURES

AREA	DATE SINCE LAST DISTURBED	STABILIZED (YES/NO)	STABILIZED WITH	CONDITION
Landfill Cover (Area A)				
Landfill Cover (Area B)				
S103	6/8/99	No		See Notes
S91	6/8/99	No		"

STABILIZATION REQUIRED:
The two hot-spot areas on the golf course (S103 & S91) have developed some gullies and washout of fill into ponds as a result of water being diverted off sodded areas to adjacent areas that were only seeded. Also silt fence is under water due to rising pond water level at S103.
TO BE PERFORMED BY: Bechtec
ON OR BEFORE: Sept. 8, 1999

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 2 OF 3)

INSPECTOR: J.R. Manning DATE: 8/12/99

Indicate the condition of the following sediment and erosion control measures. Where damage or need for maintenance is identified, indicate the specific location and the required action.

SILT FENCE:
At area S 103, the silt fence is now submerged due to rise in water elevation in the pond. With placement of additional sod, silt fence re installation is not required.

STRAW BALE DIKES:
N.A.

EROSION CONTROL/REVEGATION MATTING:
Moderate gullying was noted on northern side of S 103 fill area and on western side of S91. Repairs should include filling gullies and sodding to protect new fill from erosion.

TURF:
Areas to be repaired should receive new ~~sodd~~ sod. Sod should be staked or pinned in place to avoid washout.

000046-1

STORM WATER POLLUTION PREVENTION PLAN

INSPECTION AND MAINTENANCE REPORT FORM (PART 3 OF 3)

CHANGES REQUIRED TO THE POLLUTION PREVENTION PLAN:

None

REASON FOR CHANGES:

None

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SIGNATURE: J. R. Mann

TITLE: Project Engineer

DATE: Aug. 12, 1999

APR 26 1999

Sub Job 107 Rec Type LT Comm Date 04/22/1999 Admin Rec N CCN-Item No. 000021-1

Subject DO#0107 ERIK LERVAAG COMMENTS ON STORMWATER POLLUTION PREVENTION PLAN (SWPPP) MCCOY ANNEX LANDFILL COVER, ORLANDO

From LERVAAG Org OCED To HEVRDEYS, W. Org BEI File Loc M Closes CCN

Comm Reference

Published N

Cross Reference (Affected Doc) DO#0107 CCN#305-000016

Field CCN

Site Codes 305

Subject Codes 5320 7550

Film Reel

Owed By Org Due Date Closing CCN

Owed To Org Forecast Date Compl Date

[redacted]

DISTRIBUTION	WA	WO	DISTRIBUTION	WA	WO	DISTRIBUTION	WA	WO
PROGRAM MGR P. W. TOMICZEK						NAVY SouthDiv: E. G. BALL		
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V. H. BAUER						K. LOTT		
R. COHOSE						R. MEDDICK		
						B. GATES		
						B. NWOKIKE		
PROJECT ENGINEERS J. R. MANNING						B. GLOVER		
						D. PATRICK		
P.E. R. HOEKSTRA								
SITE SUPERINTENDENTS W. HEVRDEYS								
S. MOORE								
{FIELD PDCC} L. TALBOT								
DATA MGMT R. CRABTREE								
S&H MANAGER M. ATWOOD								
ENVIR COMPLIANCE R. ATWOOD								
CONTRACT ADM MGR T. FERGUSON								
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PROJECT ADMINISTRATOR L. LANDERS								
RECORDS MGMT B . STOUT			PDCC FILE	1				

SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORTH CHARLESTON, SOUTH CAROLINA

Rec'd 4/26/99
305-00002 I

CITY OF ORLANDO

OFFICE OF PERMITTING SERVICES

April 22, 1999

Mr William Hevrdeys
Bechtel Environmental Inc
PO Box 350
Oak Ridge, TN 37831-0350

Dear Mr Hevrdeys:

This letter is in response to your letter of April 9, 1999 concerning Bechtel Job Number 22567, **Planned McCoy Annex Landfill Cover Project**. I have reviewed your draft work plan and Stormwater Pollution Prevention Plan (SWPPP) and have determined that the project *substantially* meets the City of Orlando's permit requirements except for one item.

You stated in your work plan your intention to increase the imperviousness of the landfill cover from C=0.15 to C=0.25. Normally the city would require stormwater pollution abatement (retention) and attenuation (detention) to protect downstream areas from decreased water quality and increased runoff. However, after discussions with the City Engineer, the retention and detention requirements will be waived for this project with the understanding that any future development on this site must meet the current City standards for stormwater management, including both retention and detention.

If you have any questions or require further information, please contact me at 407-246-3807.

Sincerely,

Erik Lervaag PE
Civil Engineer III

Cc: Richard M Howard PE, City Engineer
Dayna M Walters, Development Review Services Manager
Bruce G Hossfield, Senior Planner

ATTACHMENT 5

GOPHER TORTOISE RELOCATION PERMIT

Fax Transmittal Memo 7672

To Robin Manning
Company FSEI
Location
Fax # 423 220 2748 Telephone #
Comments

No. of Pages Today's Date Time
From Wayne Hansel
Company
Location Dept. Charge
Fax # Telephone #
Original Disposition ☐ Destroy ☐ Return ☐ Call for pickup

305 000

305-000027-2

PERMIT

Issued Under Authority of the Wildlife Code of the State of Florida
(Chapter 39, Florida Administrative Code) by the

CENTRAL REGION
STATE OF FLORIDA GAME AND FRESH WATER FISH COMMISSION

1239 SW 10TH Street, Ocala, FL 34474-2797 (352)732-1225

Permit Type: Special Gopher Tortoise Relocation
Issuance Date: May 26, 1999
Permittee: Wayne Hansel
Address: Southern Division of NAVFAC
1850 John Paul Jones Ave., #2016
Orlando, FL 32803
Phone: (407)895-6714 Fax: (407)894-9442

Permit No.: GTRS5-JH-99-08
Expiration Date: 30 days subsequent to issuance
Permittee Signature*: Wayne A. Hansel
*Signature indicates acceptance of all permit conditions. This original should be signed and retained. A copy of the signed original should be returned to this office.

Affected Site:
Title (if applicable) McCoy Annex Landfill County Orange
Owner Naval Training Center
Address or Range/Township/Section T24S, R30E, S7&8

Provisions/Conditions:

1. Up to five gopher tortoises may be captured by excavation, bucket-trapping, or by hand and relocated and released to preclude their harm due to imminent construction or land clearing activities. If excavation is used, burrows are to be excavated in incremental stages to minimize the potential for harming the tortoises involved. If bucket-trapping is used, traps must be checked at least once per day and remain in place at least 25 consecutive days or until a tortoise is captured, whichever is precedent. Captures must be effected immediately prior to land clearing/construction activities to preclude tortoises returning to their burrows. Alternatively, temporary fencing may be used to exclude relocated tortoises from construction sites, but if such fencing necessitates confining tortoises, shade must be available therein, the confinement is to comply with the attached guidelines, and confinement is not to exceed 10 days. Any mortality associated with the permitted work must be reported to this office within five days.

2. Releases must be made on-site, and captures/relocation may not be effected on any day, through two consecutive days thereafter, for which the overnight low temperatures are forecast by the U.S. National Weather Service to be below 50°F.

3. This permit must be readily available for inspection at all times while engaging in the permitted activities, and is effective only subsequent to all reasonable alternatives having been exhausted to accommodate the affected tortoises in situ, and only subsequent to all necessary local, state and/or federal permits for the construction/land clearing having been issued.

Allan L. Egbert, Ph. D.
Executive Director

By: Julie A. Hovis

W666:666-13s
Attachment
FAC 6-20
cc Division of Wildlife, Tallahassee
Regional Law Enforcement Commander

22567-305
FILE 7550
7630
7440
cc RManning
WHevrdejs
RAtwood

305- 00042

BUILDING A CENTURY 1898 BECHTEL 1998

Mr. Tim Breen
Florida Game and Fresh Water Fish Comission
1239 SW Tenth Street
Ocala, Florida 34474-2797

AUG 16 1999

Subject: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
McCOY ANNEX LANDFILL COVER IRA
GOPHER TORTOISE RELOCATION PERMIT
COMPLETION REPORT
Delivery Order No. 107
Subject Code: 7550

Dear Mr. Breen:

Bechtel has completed our assigned scope for the interim remedial action at the McCoy Annex Landfill site at the Naval Training Center in Orlando. This letter provides a summary of the field activities that were taken to comply with the Gopher Tortoise Relocation Permit issued by your office May 26, 1999 (Permit No. GTRS5-JH-99-08).

Attachment 1 provides a brief chronology of field activities with particular emphasis on activities affecting and involving the Gopher Tortoise. To summarize the chronology, two tortoise traps were installed on June 1st, inspected daily, and 1 tortoise was found and relocated on June 4th. The traps were removed on June 17th when work activities in areas adjacent to active tortoise burrows were complete.

Attachment 2 to this letter consists of three pages of photographs taken during field activities. A description of the activity in the photos is provided in a caption.

If you have any questions, or if there are any further actions required of Bechtel or the Naval Training Center under the Permit, please call me at (423) 220-2406.

Sincerely,

R Attwood for J. Robin Manning

J. Robin Manning
Project Engineer

Enclosures: As stated

cc: Ms. Nancy Rodriguez, EPA Region IV
Mr. Dave Grabka, Florida Department of Environmental Protection
Lt. Gary Whipple, Public Works Department, NTC Orlando
Mr. Steve McCoy, NUS Tetra-Tech
Ms. Barbara Nwokike, SOUTHDIV
Mr. Jerry Eggebrecht, REICC, Orlando

BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

ATTACHMENT 1

Chronology of Field Activities Related to Gopher Tortoise OU2 McCoy Annex Landfill Soil Cover

April 1999

April 15-30, 1999: Bechtel Site Superintendant mobilizes to McCoy Annex to establish field office, identify lay down area, locate utilities, set up silt fence and drainage controls, stake and survey areas to be cleared and covered.

April 21, 22, 1999: Survey conducted for Gopher Tortoise burrows. Installed safety tape with buffer zone around 2 active and 1 inactive tortoise burrows identified during survey.

April 27, 1999: Final Gopher Tortoise Survey, Memo from Tetra-Tech NUS, Corp.

April 30, 1999: Transmittal Letter, J. Robin Manning, Project Engineer, Bechtel to Mr. Tim Breen, Florida Game and Fresh Water Fish Commission, outlining project activities to date and scope of interim remedial action.

May 1999

May 26, 1999: Permit for Special Gopher Tortoise Relocation Issued by Florida Game and Fresh Water Fish Commission.

June 1999

June 1: Two bucket traps installed at surveyed active tortoise burrows
June 2-June 17: Daily inspection of bucket traps
June 4: Found one tortoise in bucket trap, released on site in adjacent area not affected by construction activities.
June 22: Found one tortoise crossing access road used for construction equipment. Tortoise was moved out of the roadway into the adjacent area to prevent injury due to equipment movement on the road.
June 26, 1999: Expiration of Special Gopher Tortoise Relocation Permit

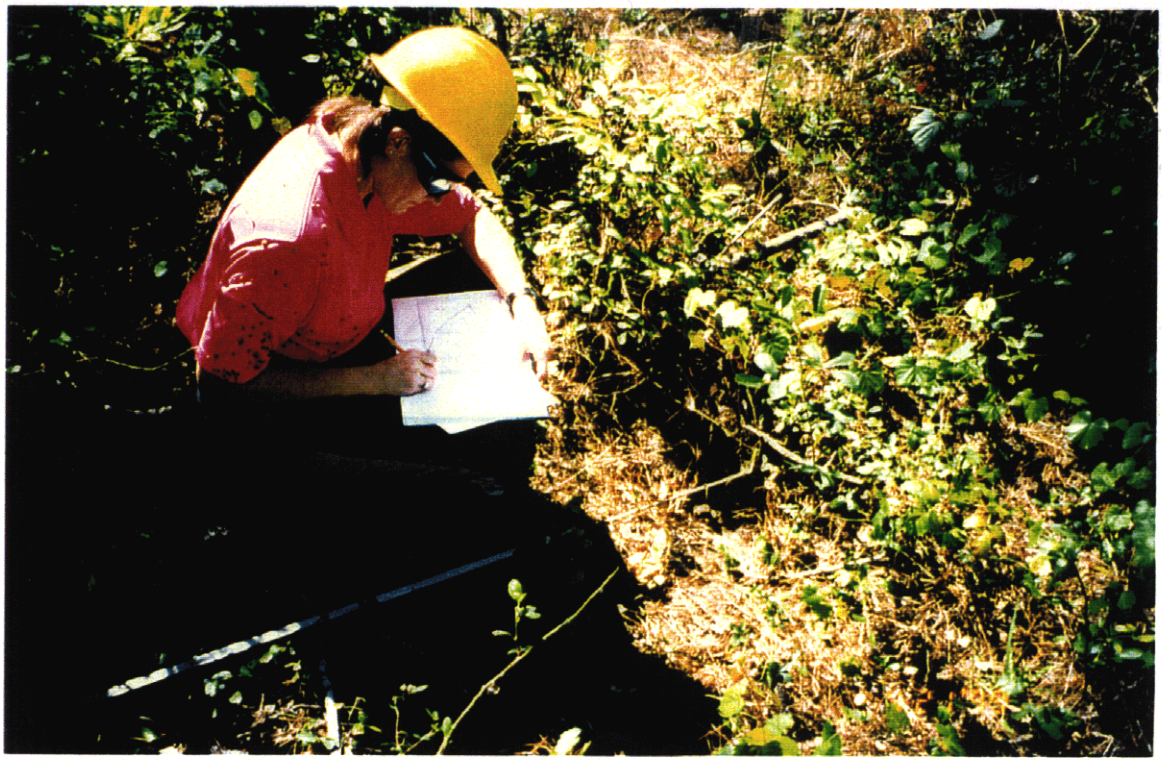
July 1999

July 7, 1999: Project field activities complete.

ATTACHMENT 2

Site Photographs

Walking the site for the Gopher Tortoise Survey



Logging burrow locations on site map during Tortoise Survey

Digging a hole for placement of a bucket trap

Final bucket trap placement

Capture of Gopher Tortoise in bucket trap

Release of Gopher Tortoise in area adjacent to land clearing activities

ATTACHMENT 6

BOGGY CREEK DRIVEWAY ENTRANCE CORRESPONSE

BUILDING A CENTURY
1898 BECHTEL 1998

MAY 25 1999

Mr. Eric Lervaag
Office of Permitting Services
Orlando City Hall
400 South Orange Ave.
Orlando, FL 32801

SUBJECT: Bechtel Job No. 22567
Department of Navy Contract No. N62467-93-D-0936
Delivery Order No. 107
McCoy Annex Landfill Cover Project
Subject Code: 5040

Dear Mr. Lervaag:

Subsequent to the City's review of the Storm Water Pollution Prevention Plan for the above referenced project, you had requested we provide a detail showing the proposed installation of a drainage culvert at the temporary driveway entrance to the site from Boggy Creek Road. There is an existing, shallow drainage swale located along the southwestern boundary of the project area. Our temporary access road must cross this small swale.

We have attached a sketch that depicts our proposed culvert installation as well as the details for the temporary drive connection to the existing curb at Boggy Creek Road. In the absence of any other guidance, we have used the City's standard driveway connection detail as our "typical" detail for the connection.

We appreciate your assistance with our project at McCoy Annex, and please do not hesitate to call me at (423) 220-2406 if you have any questions.

Sincerely,

Robin Manning
Project Engineer

Attachments: As noted

cc: Ms. Barbara Nwokike, SouthDiv
cc: Mr. Wayne Hansel, SouthDiv
cc: Lt. Gary Whipple, NTC Orlando Caretaker Office
cc: Mr. Jerry Eggebrecht, ROICC Office, Orlando

6/1

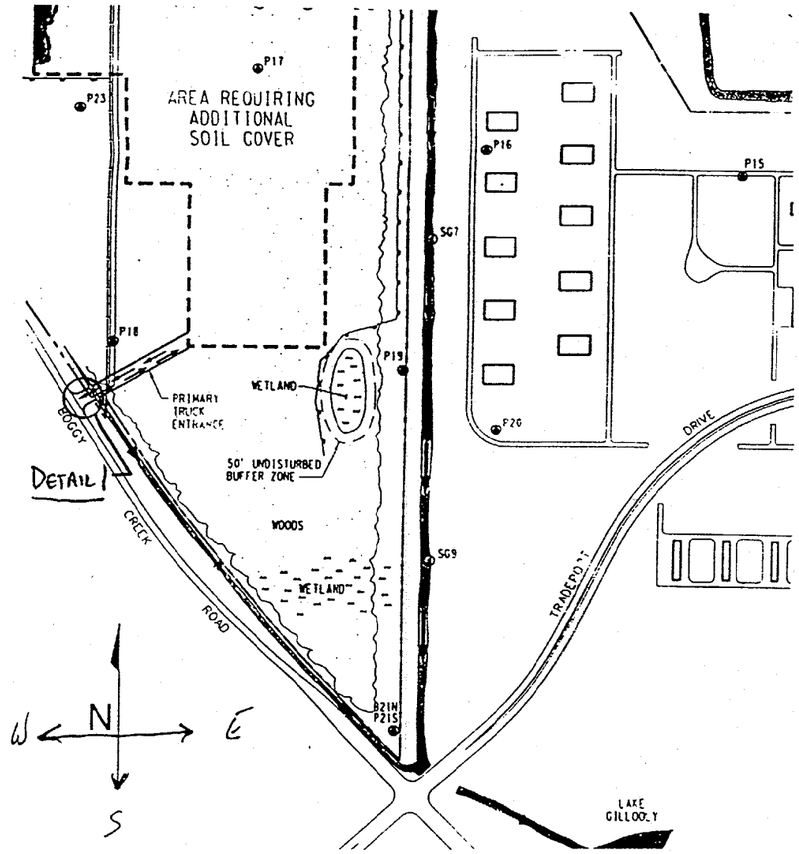
TELECON W/ ERIC & ROBIN.
OK TO LEAVE EXISTING (MIAMI)
CURB AS IS. DON'T NEED TO CUT &
RMV CURB SECTION FOR TEMP RDWAY
STILL WANT THE APRON HARD SURFAC
WILL RMV @ END OF JOB.
W Lundquist

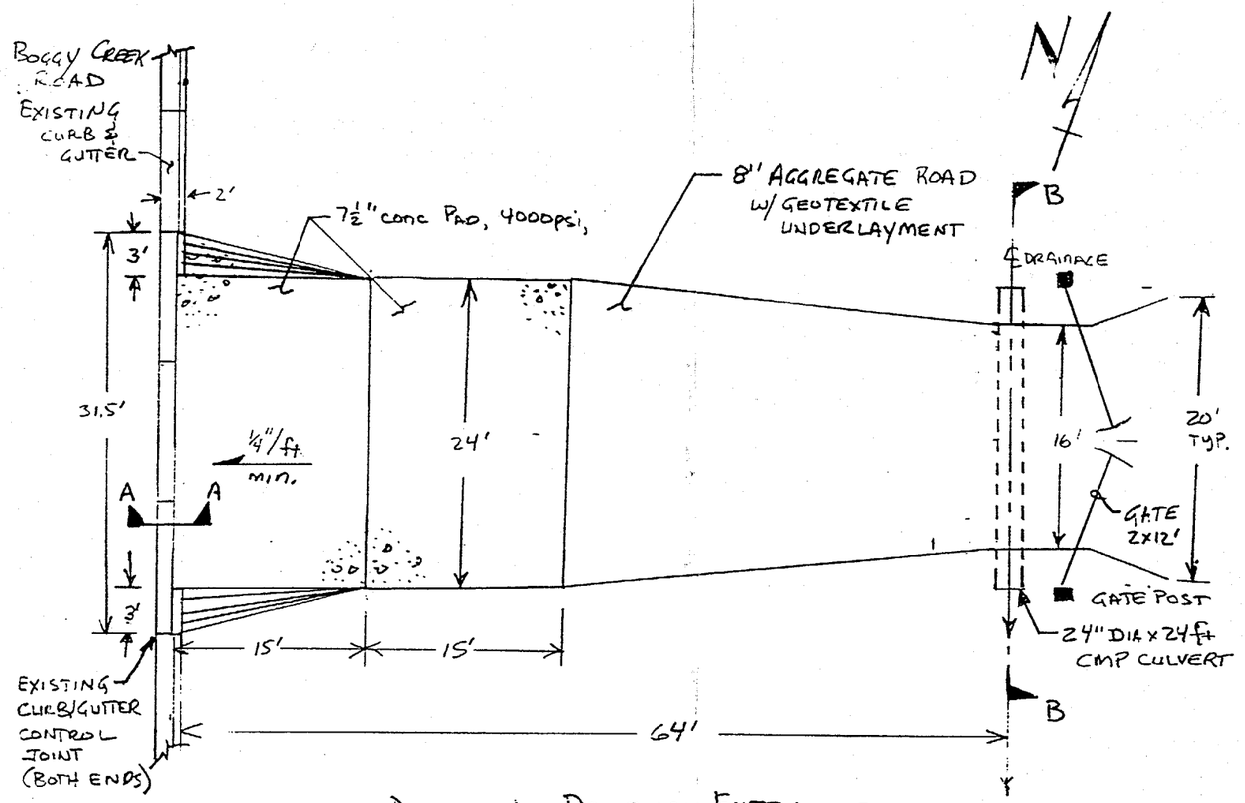
BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

Originator BILL HEVRDEYS Date MAY 21, 1999 REV. JUNE 1, 1999 Calc. No. _____

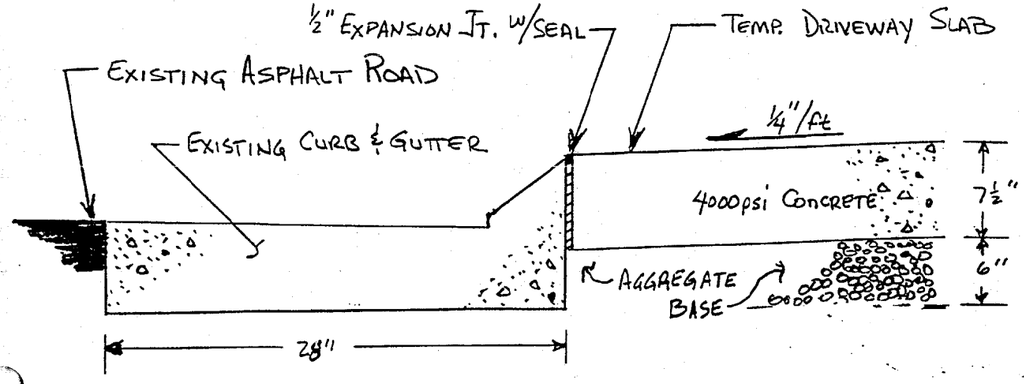
Project NAVY RAC - McCOY ANNEX Job No. 22567-305 Checked _____

Subject TEMPORARY DRIVEWAY ENTRANCE ONTO BOGGY CREEK ROAD



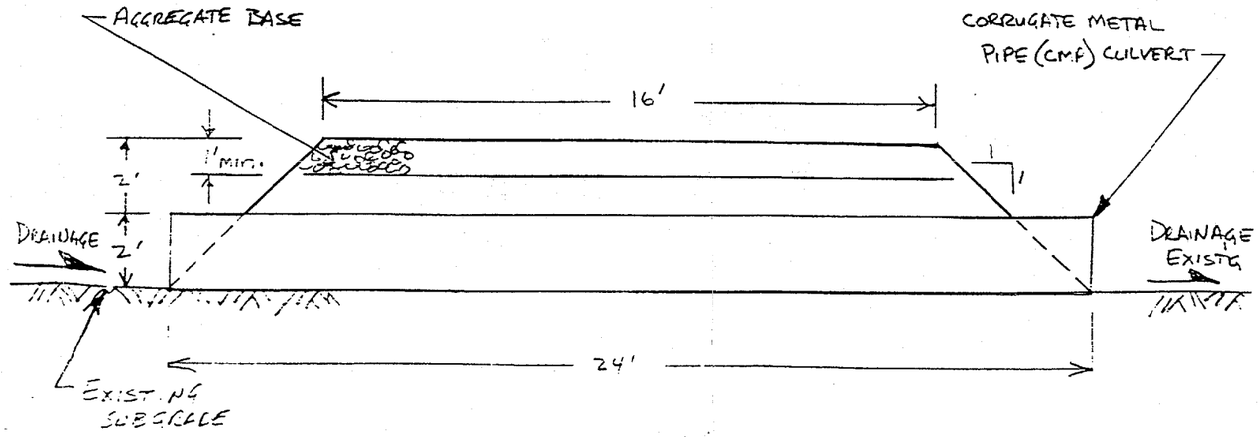


DETAIL 1 - DRIVEWAY ENTRANCE



A-A SECTION - TEMPORARY DRIVEWAY CONNECTION

REVISED JUNE 1, 1999



B-B SECTION - DRAINAGE CULVERT FOR TEMPORARY DRIVEWAY

00436E04Z

305-000040

BUILDING A CENTURY 1898 BECHTEL 1998

APR 22 1999

Mr. Bill Claypool
Engineering Department
Orange County Public Works Complex
4200 South John Young Parkway
Orlando, FL 32839-9205

SUBJECT: Bechtel Job No. 22567
Department of the Navy Contract No. N62467-93-D-0936
DO0107 PLANNED MCCOY ANNEX LANDFILL COVER PROJECT
NAS Pensacola, Florida
Subject Code: 5010

Dear Mr. Claypool:

Per your discussion with Mr. Richard Atwood of our office on April 21, 1999, Bechtel is trying to determine what portions of planned construction work at the Naval Training Center in Orlando may be within the boundaries of Orange County. In order to avoid any impacts to our construction schedule, Bechtel is going to assume that the project areas outside of the NTC Orlando fence line are in Orange County.

Bechtel is enclosing a copy of the approved work plan for the McCoy Annex Landfill Cover Project. We are also enclosing a copy of the Storm Water Notice of Intent (NOI) that has been filed with EPA Region IV to demonstrate substantive compliance with the NPDES storm water permitting requirements for land disturbing activities greater than 5 acres. Bechtel Environmental, Inc. is submitting these documents on behalf of the Commanding Officer, United States Navy, Naval Training Station, Orlando, Florida.

This project is being conducted under the jurisdiction of the Comprehensive Environmental Restoration, Compensation, and Liability Act (CERCLA), also known as the Superfund program. CERCLA provides in Section 121(e) of the Act, that no federal, state, or local permits are required to be obtained by the agency conducting the project. However, the law does require that any *substantive* requirements that would otherwise be contained in a permit must be implemented during the project.

BECHTEL ENVIRONMENTAL, INC.
151 Lafayette Drive
Oak Ridge, TN 37830 USA
mailing address: P.O. Box 350
Oak Ridge, TN 37831-0350 USA

Mr. Atwood discussed with you the fact that the documents enclosed have already been reviewed by Mr. Eric Lervaag, Office of Permitting Services, City of Orlando. The City has had some comments regarding stormwater runoff controls, maintaining equality between pre- and post-construction drainage coefficients, drainage culverts, and driveway entrance specifications. Bechtel is addressing those specific concerns and we can provide documentation of those issues and our responses if necessary.

We are requesting that your office review the enclosed work plan and Storm Water NOI. If there are any design requirements that the County believes should be met during field construction activities (that would otherwise be contained in permit conditions in a county-issued permit), please identify those requirements by April 28, 1999, so that Bechtel may make provisions to implement them during field construction.

I recognize that we have asked for a very short turnaround time, but apparently the location of this project is right on the boundary between the City and County and has made the jurisdictional decision a difficult one. If you have any questions or need additional information, please contact me or Mr. Atwood at (423) 220-2406.

Sincerely,

Robin Manning
Project Engineer

RA:ch:Lr1811

Enclosures: As stated

cc: Lt. G. Whipple, NTC Orlando
B. Nwokike, SDIV
W. Hansel, SDIV
N. Rodriguez, EPA Region IV
D. Grabka, FDEP
S. McCoy, Tetra-Tech NUS

305-000028

BECHTEL ENVIRONMENTAL, INC

TELEPHONE CALL

By:	Richard Atwood	**Of:**	Navy RAC	**Route/Copy**	B. Hevrdeys R. Manning
To:	Mr. Bill Claypool	**Of:**	Orange County Florida, Permitting Affairs Department		
Date:	5/12/99	**Time:**	1:33 PM		
Subject:	Boggy Creek Road Driveway Access Requirements for McCoy Annex Landfill Cover Project			**Job No:**	22567 305
				File:	3180, 7550, 7630, 7440

I called Mr. Claypool, (407) 836-7900, to inquire whether he and the Orange County Permitting Affairs and/or Engineering Departments had a chance to review the correspondence and figures that Bechtel sent to the County on April 22, 1999. Mr. Claypool indicated that he had received the information. Mr. Claypool requested a determination from Pat Beeman (Roads and Drainage Department) on whether the parcel of land that Bechtel had questions on was located in the City or County.

The parcel outside the Navy fence line in the northwest corner of the project boundary is in the county, not the city. However, given the limited nature of the activity, Mr. Claypool is expecting and recommending no involvement by the county and anticipating that no substantive permitting requirements will apply to the Bechtel scope of work. He has raised the issue of county participation to his supervisor for a final determination.

Mr. Claypool was able to provide final direction to Bechtel regarding the question of applicable requirements for the driveway access road that Bechtel will be installing from the NTC to Boggy Creek Road. Orange County has an agreement with the City of Orlando that the City is responsible for all driveway access issues. Bechtel has already contacted the City on this issue, and obtained a copy of the driveway detail required by the City for this construction. Bechtel has already begun planning the installation of the access route based on the City detail, and my conversation with Mr. Claypool confirms Bechtel has identified the correct requirements.

ATTACHMENT 7

WETLAND CORRESPONDENCE

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND
PO BOX 190010
NORTH CHARLESTON, SC 29419-9010

DSN 583-5572
COMMERCIAL (803) 820-5572

DSN FAX 583-5563
COM FAX (803) 820-5563

MEMORANDUM

Date: May 21, 1999

From: **Wayne J. Hansel**
Code 18B7

To: **Mr. Steve Brooker**

Subj: **Permit requirements for OU2 McCoy Annex Landfill Cover**

Encl:
1. Letter from FDEP Central District.
2. Federal Register Vol. 61, No. 241, Sec 38

This Memo is to document our phone conversation on May 21, 1999. On May 21st, I called Mr. Steve Brooker, Team Leader of the Meritt Island U.S. Army Corps of engineers(USACOE) Office as advised by the FDEP letter (Encl. 1.) to determine if a permit would be require to complete the tree removal and cover specified in our work plan for Operable Unit 2 at that he McCoy Annex Landfill. I told Mr. Brooker that Tamy Dabu from the FDEP Central District had completed a site inspection and classified the area to be covered as uplands. I also told him that our project was being completed as a time critical CERCLA interim remedial action. Mr. Brooker told me that they would most likely agree with Miss Dabu assessment and that CERCLA remediation projects which are directed by the EPA are not required to obtain permits as specified in the Federal Register Vol. 61, No. 241, Sec 38, (Encl. 2), which he faxed to me.. I told Mr. Brooker that I would write a memo to document or conversation and send him the section of the workplan which describes or project as well as a copy of the FDEP letter. If you have any comments or corrections, call me at (407) 895-6714.

Sincerely,

Wayne Hansel

Wayne Hansel
Brac Environmental Coordinator
NTC Orlando, FL

305-000031-1

Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

Department of the Navy
c/o Mr. Wayne Hansel, P.E.
Naval Facilities Engineering Command
2155 Eagle Drive
North Charleston, SC 29419-9010

File No.: 48-155661-001
Applicant: Department of the Navy

Dear Mr. Hansel:

Thank you for meeting with me on May 5, 1999 at the area designated as Area B within the Remedial Work for the McCoy Annex in Orlando, Florida. The project comprises the placement of two feet of cover within Area B, which is a historical landfill/waste site used by the Navy. Based upon the information you sent to us, and the site inspection we have determined that **your project as proposed does not require an Environmental Resource Permit.**

The land within Area B comprises uplands, and does not meet the definition of a wetland as described in Section 62-340 Florida Administrative Code (F.A.C.). Any activity within the "pond" which is located on the west side of Area B and the ditches which are located north and south of Area B will require a permit from this Bureau. During the site inspection, I recommended that turbidity control devices be installed prior to any land clearing and filling activities along the top of bank to the "pond" and the ditches. Any fill material should be stabilized to prevent runoff into the "pond" and adjacent ditches.

A copy of this letter has been sent to the U. S. Army Corps of Engineers (USACOE). The USACOE may require a separate permit. **Failure to obtain this authorization prior to construction could subject you to enforcement action by that agency.** For further information, you should contact the USACOE at 904-325-2028.

If you change the project from what you submitted, the above authorizations may no longer be valid. Please contact us prior to construction if you wish to make any changes.

If you have any questions, please contact Tamy Dabu at the letterhead address or call 407/893-3307, between the hours of 8:00 a.m. and 5:00 p.m. When referring to your project please use the DEP File number listed above.

Sincerely,

Tamy Dabu

Tamy Dabu
Environmental Specialist
Submerged Lands and Environmental
Resources Program
Date: May 13, 1999

TZ/td/vq
cc: Mr. David Grabka, FDEP, Bureau of Waste Cleanup (Tallahassee)
Thad Hart, ACOE, Palatka

TETRA TECH NUS, INC.

800 Oak Ridge Turnpike
Jackson Plaza, Suite A-600
Oak Ridge, TN 37830

(423) 483-9900
FAX: (423) 483-2014

98-E452

December 29, 1998

Mr. Bob Cohose
Bechtel Environmental, Inc.
151 Lafayette Drive
Oak Ridge, Tennessee 37831

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0024

Subject: Wetlands Survey of Operable Unit 2, McCoy Annex Landfill,
Naval Training Center, Orlando Florida

Dear Mr. Cohose:

As we discussed previously, Tetra Tech NUS' David Stair performed a wetlands survey in the southern portion of OU 2 as part of the OU 2 remedial investigation. The attached report presents the findings of the survey and identifies the approximate locations of the wetlands. If you have any questions regarding the survey or need additional information, please call me at (423) 220-4730.

Sincerely yours,

Steven B. McCoy, P.E.
Task Order Manager

Enclosure

SBM/smc

c: Ms. Barbara Nwokike, SOUTHDIV

Summary

Both areas which were surveyed in the field by Tetra Tech NUS are jurisdictional wetlands due to presence of indicators of wetland hydrology (morphological plant adaptations, drift lines, rafted debris, etc.), hydric soil conditions (accretions of organic matter on surface) and the dominance of the vegetation community by obligate wetland plants (cypress, etc.). Approximate wetland boundaries were marked in the field with orange and pink flagging as requested by Bechtel. The location of the wetlands is mapped on the attached drawing (Figure 2).

Wetlands in the northwest corner of the Landfill Area 3 were not flagged or surveyed in the field by TtNUS but the confidence in their approximate location and existence as mapped by the NWI is great. These areas are described by NWI as palustrine (P), unconsolidated bottom (UB), permanently flooded (H), excavated (x).

Regulatory Obligation

Since no impacts to the wetlands are anticipated, a permit or submittal of a wetland delineation report is not required. However, coordination with regulatory personnel is suggested.

TETRATECH NUS, INC.
Oak Ridge Office

To: Steve McCoy **Date:** December 29, 1998

From: David Stair MSC for **Phone/Fax:** (423) 220-4767 / (423) 483-2014

Subject: **Wetlands Survey of OU 2, McCoy Annex Landfill, Naval Training Center, Orlando, Florida**

On November 23, 1998, I performed an in-field survey of wetland boundaries at the southern end of the Landfill Area 3 at McCoy Annex, Naval Training Center, in Orlando, Florida. Boundaries were flagged in the field and distances measured from known objects to map the approximate boundaries. Bill Hevrdeys at Bechtel, the Navy Remedial Action Contractor, requested flagging of boundaries to minimize impact from logging activities planned for the rest of the Landfill Area 3.

Florida wetland delineation methodologies described in Chapter 62-340, F.A.C. and in the Florida Unified Wetland Delineation Manual were used in the survey.

The in-field survey confirmed the location of wetland areas as mapped by the National Wetland Inventory (NWI)(Figure 1). The NWI describes the areas as palustrine forested, deciduous, semi-permanently flooded (PF06F). Wetland areas were found in topographic depressions or low areas. This letter report describes the plant community, soil profile and hydrological indicators, observed during the brief field survey.

Soils
The Orange County Soil Survey (U.S. Department of Agriculture, Soil Conservation Service, Soil Survey Series 1957, No. 5) maps the area as Blanton fine sand, level high phase (Ba). The Blanton soil series does not appear on the attached list of Hydric Map Units of Orange County, Florida. The profile description of the upland Blanton soils in the Soil Survey Manual (0-6", dark gray, 10YR 4/1, nearly loose fine sand; 6-10", gray, 10YR 5/1, nearly loose fine sand) matches that described in the field (0-8", dark gray, 10YR 6/1, sand). Soils of the depressions are assumed to be inclusions in the mapped unit. Profiles of the topographic low areas were found to contain a surface layer of mucky organic matter (0-6", black, 5YR 2.5/1, muck; 6-10", dark gray, 10YR 6/1, sand) indicative of wetland soils.

Plant Community
The predominant species of the canopy layer in these wetland depressions is the obligate wetland plant - bald and/or pond cypress, Taxodium distichum (var. nutans). Cypress is a deciduous flood-tolerant conifer, losing its needles by the end of November and flushing again in March. Other species found in the canopy and shrub layers included blackgum (Nyssa sylvatica) and bayberry, probably southern waxmyrtle (Myrica cerifera). In the small wetland surrounding Old-OU2-26C, buttressed trucks characterized the cypress community with no visible knees assumed to indicate saturated soil conditions without standing water. Cypress knees were present in the larger southern wetland area. This plant community is likely best described as Ecological Community No. 16 - Scrub Cypress (USDA, Soil Conservation Service, 26 Ecological Communities of Florida, 1981). Cinnamon or royal fern (Osmunda sp.) and beak rush (Rychospora sp.) were present at both wetland areas.

Hydrology
The presence of plant adaptations to saturated (buttressed trunks) or inundated (cypress knees) conditions are used to indicate the presence of wetland hydrology. In the southern wetland area, plant debris dams, scoured soil surfaces, and water marks are definitive indicators of flooding and/or flowing water conditions. A point source of water for the small wetland area surrounding Old-OU2-26C was not identified however, for the southern wetland area, the main source of water is an overflow culvert under Boggy Creek Road.

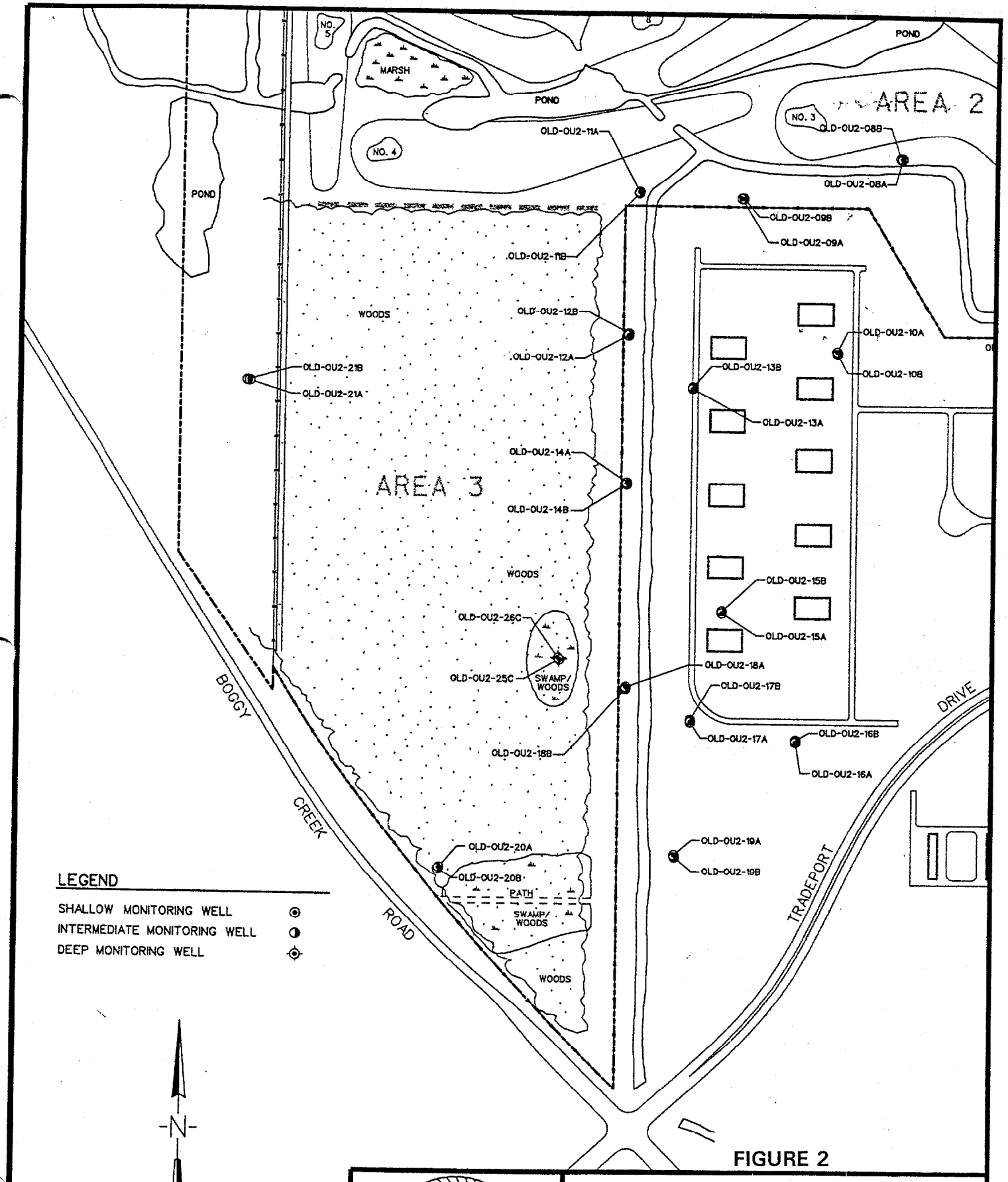


FIGURE 2

FIELD SURVEY OF WETLANDS IN LANDFILL AREA McCOY ANNEX LANDFILL WETLAND SURVEY

NAVAL TRAINING CENTER
ORLANDO, FLORIDA

t8-5x11v.dgn

CAD FILE NO./DATE: 7457L001.dgn/12-30-98

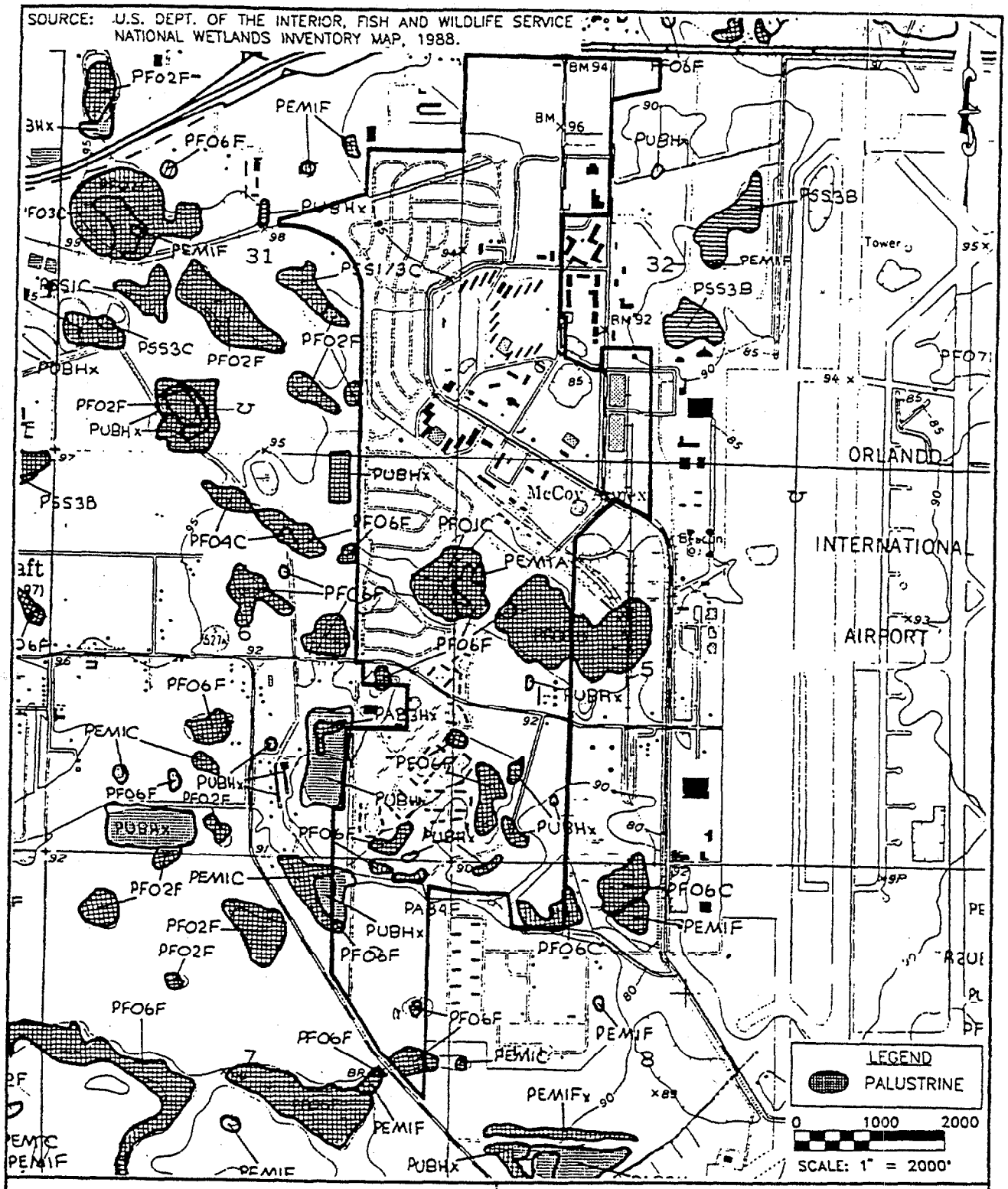


FIGURE 1

LOCATION OF WETLANDS AT McCOY ANNEX

BRAC ENVIRONMENTAL BASELINE SURVEY REPORT

NAVAL TRAINING CENTER ORLANDO, FLORIDA

Hydric Map Units

Orange County, Florida

Map Symbol (1960 Survey)	Map Symbol (1985 Survey)	Map Unit Name
Ra	3	Basinger fine sand, depressional
Ec	9	Canova muck
Mb	10	Chobee fine sandy loam, frequently flooded
	11	Chobee-Floridana association, frequently flooded
Mc	12	Emeralda-Holopaw association, frequently flooded
Fa, Pe	13	Felda fine sand
Da	14	Felda fine sand, occasionally flooded
Ad	15	Felda soils, frequently flooded
Da, Db, Pf	16	Floridana fine sand, frequently flooded
Da, Dc, Ma	17	Floridana mucky fine sand, frequently flooded
Ed, Ee	18	Gator muck
Bl, Bm	19	Hontoon muck
Aa, Ca, Pd	23	Malabar fine sand
	25	Okeelanta muck
Ac	31	Pineda fine sand, frequently flooded
Bj, Bk, Pa	40	Samsula muck
Fs	41	Samsula-Hontoon-Basinger association, depressional
Rc	42	Sanibel muck
Ef	49	Terra Ceia muck
Rb	53	Wauberg fine sand

ATTACHMENT 8

JOB PHOTOGRAPHS

Fairway #4 restored.

Restored Fairway #4 fence installed on 2-ft soil cover, looking east.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Restored Fairway #4 fence installed on 2-ft soil cover, looking east.

Bermuda sod being rolled out on Fairway #4.

Soil cover material placement south of Fairway #4.

PAH-contaminated soil deposited on Fairway #4.

Laying Bahia sod on slope of sample location S91.

Topsoil being spread at sample location S91.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Clearing and grubbing sample location S103.

PAH soil removal from sample location S103.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Topsoil being spread at sample location S103.

Bahia sod laid on slope of sample location S103.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Sample location S103 restored.

Sample location S91 restored.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Landfill Area A looking south from NE corner.

Landfill Area A south end, revegetating.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Landfill Area B revegetating, looking NW from SE corner.

North end of Area B, looking south.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Cutting timber from landfill Area A.

Loading marketable timber cut from landfill Area A.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Grubbing tree stumps, landfill Area A.

Silt fence installed to protect wetland at the SE corner of Area A.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Root rake landfill Area A, and Chipping stumps and limbs.

Feeding tub grinder to chip stumps.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Haul road with stabilization fabric.

Aggregate placement for haul road.

Site OU2, McCoy Annex, Naval Training Center, Orlando, FL.

Boggy Creek Road driveway entrance for haul road.