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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON THE DRAFT PROPOSED PLAN FOR OPERABLE UNIT 4 (OU 4) NTC  
ORLANDO FL  
7/24/2013  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



## FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER  
2600 BLAIRSTONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

July 24, 2013

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

RE: Draft Proposed Plan for Operable Unit 4, Former Naval Training Center, Orlando, Florida

Dear Mr. Sanford:

I have completed my review of the Draft Proposed Plan for Operable Unit 4, Former Naval Training Center, Orlando, dated May 2013 (received by e-mail on May 31, 2013). The Proposed Plan adequately describes the Navy's selected remedy to address chlorinated volatile organic compounds (VOCs) in the surficial aquifer, antimony contamination in the surficial aquifer and chlorinated VOCs in the Hawthorn aquifer. I find the selected remedies for the surficial aquifer, Alternative V-8 for chlorinated VOCs and Alternative A-2 for antimony, to be acceptable.

However, I find the selected remedy for the Hawthorn aquifer, H-2, comprised of land use controls, groundwater monitoring and natural attenuation, does not comport with the Department's cleanup rule, Chapter 62-780, Florida Administrative Code (F.A.C.). Source area contamination has been detected at levels indicating the possible presence of dense non-aqueous phase liquid (DNAPL). Contaminant concentrations in the source area have reportedly increased. Chlorinated VOCs have also been detected in wells at the property boundary at concentrations above the Department's natural attenuation default criteria. As I do not concur with the entire remedy, I cannot approve of the Proposed Plan being acceptable for distribution to the public. While some of the criteria that would allow natural attenuation monitoring as the sole remedy in the Hawthorn aquifer appear to have been met, they do not outweigh those criteria that are not met. The Department requests that the Navy propose a plan or plans to remediate the areas of highest contaminant concentrations in the Hawthorn aquifer, to potentially provide hydraulic control at the northern property boundary to keep chlorinated VOCs from migrating or from further migrating onto the adjacent property, and to ultimately remediate the site to the Department's No Further Action criteria in Section 62-780.680, F.A.C. Please note that the Department expects that natural attenuation monitoring would be a component of any

Mr. Art Sanford  
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active remedy the Navy might propose to address contamination in the Hawthorn aquifer and that this would be acceptable.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,

A handwritten signature in blue ink that reads "David P. Grabka". The signature is fluid and cursive, with a long horizontal stroke at the end.

David P. Grabka, P.G.  
Remedial Project Manager  
DoD and Brownfields Partnerships

cc: Marianne Sweeney, AECOM, Orlando

KAW

Handwritten initials "KAW" in blue ink, with a stylized flourish extending from the "W".