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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE DRAFT DECISION DOCUMENT FOR STUDY AREA 17 NTC
ORLANDO FL
12/29/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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Secretary

December 29, 2011

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

RE: Draft Decision Document for Study Area 17, Naval Training Center Orlando,
Orlando, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft Decision Document for Study Area 17, Naval Training Center Orlando, dated December 2011 (received December 5, 2011), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the document:

- (1) In Section 1.2, page 1-2, first paragraph, it says that all the buildings except Building 7141 have been removed. In other parts of the section, it describes the buildings as if they still exist.
- (2) In Section 1.3, page 1-3, first paragraph, last sentence, the term "sportive" as an adjective for the silty layers is used incorrectly. Sportive is defined as playful or of or relating to sports. Possibly the term "sorptive" was meant instead.
- (3) In Section 1.4, page 1-4, third paragraph, first sentence, please change "surfaces" to "surface".
- (4) In Section 1.4, page 1-4, third paragraph, it states that groundwater flow in Zones A and B of the surficial aquifer is southeastward toward the ditch. In Section 3.1, page 3-1, second paragraph, second sentence, it says that groundwater flow in Zones A and B tends to be southward.
- (5) In Section 2.3, page 2-3, it says a soil IRA was performed to remediate surface soil concentrations of arsenic and PAHs that exceeded the State of Florida residential SCTLs and/or the USEPA residential risk-based concentrations. The soil IRA

only addressed soils with concentrations above the Department's commercial/ industrial SCTLs which were in effect at that time.

- (6) In Section 2.7, page 2-5 and in Section 2.8, page 2-6, third paragraph, the acronym CVOCs, referring to chlorinated volatile organic compounds, is misspelled COVCs.
- (7) In Section 2.9, page 2-7, fifth sentence, please remove where it says "... a remedial methodology known as ERD." The description of ERD and the use of EOS® to implement ERD is explained in the previous section.
- (8) In several parts of the document it mentions the SA 17 site boundary where it probably should say the original SA 17 site boundary. The Department considers the area with remaining soil contamination above residential SCTLs and the complete areal extent of groundwater plumes to their points of compliance to be the SA 17 site boundary.
- (9) In Section 3.4, third paragraph, top of page 3-4, it indicates that the maximum concentrations of TCE in the source area detected during the October/November 2010 sampling event was 974 µg/L. This is contradicted by Table 2 on page 3-5, which has a TCE concentration of 21,100 µg/L in MW-53C1 for that sampling event.
- (10) In Table 2, for the December 2007 sampling event, there is nothing depicted for MW-58B. There should either be a TCE concentration or two asterisks depicted.
- (11) In Section 3.4 and in Table 2, the reported groundwater contaminant concentrations end with the October/November 2010 sampling event. However, in Figures 12, 13, 14 and 15, data from the March 2011 sampling event is depicted.
- (12) In Section 4.0, page 4-1, first paragraph, it only addresses contaminated surface soils with no mention of whether subsurface soils were contaminated or addressed. Also, in the second sentence, it should say that "Groundwater is the only site media that requires further remedial action."
- (13) In Section 4.0, page 4-1, fifth bullet, please change the sentence to read "Identification of and groundwater monitoring at a Temporary Point of Compliance located at the facility boundary."

- (14) In Section 4.0, page 4-1, paragraph at the bottom of the page, it states that current and future construction activity will also be restricted at the site until the remedial objectives are met. The remedial objectives are never explicitly stated in the document and need to be.
- (15) In Section 4.1, page 4-2, first paragraph, please state that the land and groundwater use controls implemented by restrictions placed in the deed for Study Area 17 only extend to the original site boundary as depicted in Figure 3.
- (16) In Section 4.1, fourth paragraph on page 4-3, the dates need to be corrected. It says groundwater monitoring is scheduled through 2010 and that monitoring requirements for 2011 and beyond will be evaluated based on the data that are collected. The 2011 data has already been collected.
- (17) In Section 4.2, page 4-4, first paragraph, same comment as (16).
- (18) In Section 4.4, page 4-6, please change the sentence to read "If this condition is observed, then risk management options as described in F.A.C. Rule 62-780.680 may provide an alternative means for effecting site closure by an FDEP determination of No Further Action with institutional controls."
- (19) In Table 4, three well points located in the ditch at Study Area 17, OLD-17-31A, OLD-17-32A and OLD-17-33A, are depicted in shaded boxes. Please identify these as well points in the rationale and comments column and also specify they are to be monitored to determine the potential for discharge of contaminants to the ditch. Also in Table 4, for well OLD-17-44A, it says only water level measurements are to be taken, but in the next column it identifies the well as slated for groundwater sample collection.
- (20) In Section 5.0, Community Acceptance, it mentions that community acceptance of the selected remedy was evaluated during meetings of the facility's Restoration Advisory Board (RAB). As the RAB disbanded several years ago, it could not have had a chance to comment on the selected remedy proposed in the Decision Document. Rather, they were informed of previous Interim Remedial Actions performed at the site, including remediation strategies incorporated into the Decision Document, and appeared to have no comments on them at that time.
- (21) In the References section of the report on page R-1, please add the September 2008 CH2M Hill Constructors, Inc., Remedial Action Completion Report,

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Injection and Recirculation of Emulsified Oil Substrate (EOS) at Study Area 17,
Former Naval Training Center, Orlando, Florida.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

Cc: Teresa Grayson, Tetra Tech NUS, Oak Ridge, TN

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