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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON THE REVISED FEASIBILITY STUDY FOR OPERABLE UNIT 2 (OU 2) REVISION 2 NTC ORLANDO FL
8/30/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 30, 2011

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

RE: Revised Feasibility Study Report for Operable Unit 2, Revision 2, Naval Training Center Orlando, Orlando, Florida.

Dear Mr. Sanford:

I have completed my review of the Revised Feasibility Study Report for Operable Unit 2, Revision 2, Naval Training Center Orlando, dated April 2011 (received April 29, 2011), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Revised Feasibility Study Report:

(1) On page 1-11, Section 1.4.3, second sentence, it states that FDEP CTLs are based on a human health risk of 1×10^{-6}. This is not really accurate. The derivation of CTLs is much more involved. It can be based on an incremental lifetime cancer risk of 1×10^{-6}, a hazard index of 1.0, for soils it can be based on leachability to groundwater so as not to exceed groundwater CTLs, for groundwater it can be based on organoleptic concerns, and for surface water CTLs, it can be based on ecological concerns.

(2) On page 1-13, it says that the results of the Phase II Pilot Study biobarrier wall, implemented in September 2008, have not yet been published. The Department would like these results in a document subject for inclusion in the Administrative Records for Naval Training Center Orlando before moving forward with and approving the expansion of the biobarrier wall.

(3) Two of the COPCs that were identified using EPA methodology were not explained. These were lead-210 in surface soil, which exceeded the EPA RSL for residential exposure to soil, and potassium-40 in pond sediments, which was identified as exceeding the EPA RSL for industrial exposure to soil. The presence

of these radioactive isotopes was never clearly explained and management of them never considered.

(4) Throughout the report, two contaminants, iron and manganese, were eliminated based on the argument that their screening criteria are based on secondary standards rather than on human health risk. This argument is made for both groundwater and surface water. The Department has derived human health based groundwater cleanup target levels for both elements, 4,200 µg/L for iron (gastrointestinal) and 330 µg/L for manganese (neurological). Please also note that the freshwater surface water CTL (surface water quality criteria per Chapter 62-302, Florida Administrative Code) for iron (1,000 µg/L) for Class III waters is based on maintaining waters suitable for recreation and the propagation and maintenance of a healthy, well-balanced population of fish and wildlife. Lastly, high concentrations of iron and manganese are specifically indicative of leachate being generated by a landfill, which Operable Unit 2 is. The concentrations I have identified above are State chemical-specific ARARs.

(5) The proposal to extend the biobarrier wall has been evaluated by the Department's Federal Programs Section's engineer and determined to be a reasonable course of action. Per my comment (2) above, please provide a document summarizing the results of the Pilot Studies performed to date at Operable Unit 2.

(6) Please provide a short summary of the remedial technologies originally evaluated for Operable Unit 2 that were not carried over to the Revised Feasibility Study Report and describe why they are still not suitable.

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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