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MEMORANDUM REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION LETTER OF CONCURRENCE FOR DECISION DOCUMENT STUDY AREA
(SA) 2 HERNDON ANNEX NTC ORLANDO FL
7/12/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of
Environmental Protection

Memorandum

TO: David B. Struhs, Secretary

FROM: John M. Ruddell, Director *JMR*
Division of Waste Management

DATE: July 12, 2000

SUBJECT: Decision Document for Study Area 2, Herndon
Annex, Orlando Naval Training Center, Orlando,
Florida

Attached for your review and signature is a letter of concurrence to the Navy regarding the selected remedies for Study Area 2, Herndon Annex, Orlando Naval Training Center.

Study Area 2 is comprised of an abandoned septic tank (Facility 6001), several former aircraft parking aprons, a warehouse (Building 602), a former machine shop (Building 606), and several other buildings. Study Area 2, Herndon Annex, is scheduled to be transferred from the Navy to the City of Orlando for use by the Greater Orlando Aviation Authority (GOAA). GOAA intends to use the property as a support facility for the Orlando Executive Airport, a commercial/industrial use.

Site screening investigations at Study Area 2 were conducted in five phases between July 1994 and December 1998. Geophysical surveys have indicated three possible areas where landfill materials may have been disposed. Investigation of the cover of these landfills did not reveal contaminant concentrations that would preclude the site from being used for its intended industrial use. An investigation of groundwater at Study Area 2 identified a benzene plume located in the surficial aquifer primarily at depths ranging from 40 to 62 feet below land surface. This plume has migrated off the Herndon Annex property under the adjacent Azalea Park neighborhood. Quarterly groundwater monitoring has been performed since July 1999. Trends in benzene concentrations indicate that there may be a mechanism that is very slowly attenuating the benzene plume. However, modeling has indicated that an extended period of time may be necessary for contaminant concentrations to be reduced to below Florida primary groundwater standards. Three private irrigation wells and one air conditioning well, all screened within the surficial aquifer, were identified in the Azalea Park neighborhood. Benzene concentrations above Florida primary groundwater standards were detected in two wells, an irrigation and an air conditioning well at 20 Nancy Lee Avenue.

MEMORANDUM
Mr. David B. Struhs
Page Two
July 12, 2000

The selected remedies for Study Area 2 are a combination of active and passive remediation methods and institutional controls. For the landfill areas, deed transfer documents will contain language notifying the property owner of the presence of the former landfills and will contain institutional controls preventing intrusive activities into the landfills, requiring the maintenance of the existing soil cover and restrictions to property to non-residential usage. Additionally, institutional controls will be implemented to prevent the use of groundwater beneath the landfill areas. The selected remedies for the benzene plume consist of injecting Oxygen Release Compound (ORC) to enhance natural attenuation, groundwater monitoring to verify enhanced natural attenuation and the implementation of groundwater use restrictions or groundwater use advisories for the surficial aquifer. The remedies will address the entire benzene plume and will be determined successful upon attainment of the groundwater cleanup target level for benzene, which is expected to occur in approximately five years. Groundwater use restrictions will be applied to property overlying the portion of the benzene plume on Navy property and groundwater use advisories will be sent to Azalea Park residents who have property overlying the benzene plume that has migrated off Navy property. The groundwater use restrictions and advisories are temporary and will be removed upon attainment of groundwater cleanup target levels. Groundwater monitoring of the entire benzene plume is to be conducted quarterly for a period of one year, at which time the data will be evaluated to determine if additional ORC injections are necessary and to make necessary adjustments to monitoring frequency. With permission of the residents, the monitoring program will also include the four private wells within the Azalea Park neighborhood. Local residents will be issued a groundwater use advisory warning them of the potential hazards associated with using the surficial aquifer as a potable water source. Notification will also be provided to the St. Johns River Water Management District, the Orange County Environmental Protection Division and the City of Orlando of the presence of benzene in the surficial aquifer both on the Herndon Annex property and the Azalea Park neighborhood.

Institutional controls consisting of land use and groundwater use restrictions shall be implemented through a Restrictive Covenant to the property deed granting the Department a perpetual conservation easement that shall run with the land and the title to the property and that will be binding on all subsequent owners of the property. The Restrictive Covenant shall be enforceable by the Department through injunctive relief or other available remedies. The Restrictive Covenant shall also only be released with Department concurrence.

MEMORANDUM
Mr. David B. Struhs
Page Three
July 12, 2000

The public was informed of the activities regarding Herndon Annex by public notices and in several meetings, including a Public Availability Session at the Azalea Park Elementary School and presentations to the facility's Restoration Advisory Board (RAB). There have been no unresolved comments or questions from the public.

Based upon information in the Decision Document, the selected remedies are protective of human health and the environment. I recommend that you sign the attached concurrence letter.

JMR/dpg

Attachment



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 12, 2000

Captain Richard Cellon, Commander
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, South Carolina 29419-9010

Dear Captain Cellon:

The Florida Department of Environmental Protection concurs with Southern Division Naval Facilities Engineering Command's selected remedy for Study Area 2, Orlando Naval Training Center, as reported in the Decision Document. For the three landfill areas, the selected remedies are to apply institutional controls through land use restrictions for the purpose of deterring excavation activities into landfill material, requiring maintenance of the soil cover over the landfill material and a land use restriction to non-residential usage. For the benzene plume, the selected remedies include injection of Oxygen Release Compound, groundwater monitoring until Groundwater Cleanup Target Levels are met and groundwater use restrictions or advisories for the surficial aquifer. Groundwater use restrictions will be applied on Navy property overlying the benzene plume. For the portion of the benzene plume that has migrated under the adjacent Azalea Park neighborhood, a groundwater advisory shall be issued to the residents warning them of the potential hazards of using water from the surficial aquifer as a potable water source. Notification of the presence of benzene in groundwater both on the Herndon Annex property and the adjacent Azalea Park neighborhood will be sent to applicable state, county and city agencies.

If you have any questions concerning this letter of concurrence, please contact David P. Grabka at (850) 488-3693.

Sincerely,

David B. Struhs
Secretary

DBS/dpg

cc: Wayne Hansel, BEC, SouthDiv