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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITES 5A, 7, 29, 35, 38, AND PSC 1485C ASSESSMENT REPORT NAS WHITING FIELD FL
9/18/2002
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 18, 2002

4WD-FFB

Commanding Officer
ATTN Code ES31 **Linda Martin**
Naval Facilities Engineering Command Southern Division
P.O. Box 190010
North Charleston SC 29419-9010

SUBJECT: NAS Whiting Field, Florida
EPA ID# FL2 170 023 244

Dear Ms. Martin:

The United States Environmental Protection Agency (EPA) has received and reviewed the following document:

- **Assessment Report for Sites 5A, 07, 29, 35, 38 and PSC1485C, Naval Air Station Whiting Field, Milton, Florida, Rev. 0, January 2002.** (Tetra Tech NUS, Inc.)

Enclosed are EPA's review comments. EPA's review comments are divided into two categories: general and specific. General comments are those comments which apply to the document as whole, or are global in nature; and specific comments apply to those areas of the document defined within the comment. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

Craig A. Benedikt

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jim Cason, FDEP
Amy Twitty, CH2M Hill, Navarre Office

EPA REVIEW COMMENTS
Assessment Report for Sites 5A, 07, 29, 35, 38, and PSC1485C
Dated January 2002

GENERAL

1. The document refers to proposed FDEP standards, which may or may not change in the future, in discussions of COPCs. COPC evaluations should be based on standards currently in place and should not be based on speculation of what standards may be in the future.
2. Please provide the relevant risk assessment (human health and ecological) documentation as appendices to the document.
3. In a number of locations throughout the document, the statement is made that regulatory limits are too conservative. These statements merit additional explanation or should be removed from the document.
4. The definition for each acronym should be included in the text at the location the acronym is first used throughout the document.
5. Throughout the document, the text states that FDEP has agreed that arsenic is naturally occurring at NAS Whiting Field. The text should instead state that upon closer examination of all the data collected at NAS Whiting, arsenic has been determined to be a naturally occurring constituent in the soil at NAS Whiting Field.
6. Based on the high level of effort expended in conducting the assessments contained in this document, the Navy should consider revising and relabeling the document as a remedial investigation (RI) report for the subject sites, especially for those sites which require additional action. Most general assessments do not include human health and ecological risk assessments as this report does. The information presented in this document is more typical of a RI report. By presenting the information in a RI report, the Navy could streamline the process by then conducting a focused feasibility study rather than having to go back and conduct a RI. This approach would reduce the overall cost to the Navy and allow remedial action to be conducted at the sites at an accelerated pace. For those sites where a simple removal action can mitigate the risk, the removal action should take place, followed by a no further action designation in the site management plan. No record of decision would be prepared for these sites.

SPECIFIC

1. **Page iii, Table of Contents.** The "Professional Review Certification" and the "Acronyms" listed as Sections 8 and 10, respectively, should be moved to the front of the document instead of occurring at the end of the document.
2. **Page F-1, Foreword.** Remove the words "The" and "acts" in the last sentence of the second paragraph. In the last sentence on this page, change "Mr." to "Ms.

3. **Page ES-1, Executive Summary.** The first and second sentences of the third paragraph should be reworded for clarity.
4. **Page ES-2, Executive Summary.** In the first paragraph on this page and elsewhere in the document, "Region IX RAGs" should be changed to "Region IV RAGs". In the second paragraph and elsewhere in the document, "USEPA Region IV PRGR" should be changed to "USEPA Region IX PRGs".
5. **Figure 1-2, Site 5 Map.** This figure identifies the building as Bldg. 1454; however, the text identifies the building as 1478. Please revise as necessary.
6. **Figure 1-5, Site 35 Map.** The figure identifies the building as Bldg. 1129; however, the text identifies the building as Bldg. 1129. Please revise as necessary.
7. **Page 1-14, Section 1.2.3.1.** The first sentence of the first paragraph should be revised as follows: "During an April 1999 meeting between the Navy, EPA, and FDEP, discussions concerning the Site 6 RI led to the question as to whether the Detection and Monitoring Program at Site 5 had included sampling for PCBs...."
8. **Page 1-15, Section 1.2.3.3.** The first sentence of the first paragraph should be reworded for clarity.
9. **Page 1-16, Section 1.2.3.3.** The last sentence of this section is incomplete. Please revise.
10. **Page 1-17, Section 1.3.** The second sentence of this section should be revised for clarity. The same text is also used in the first paragraph of Section 1.3.2 and should also be revised.
11. **Page 3-19, Section 3.3.1.** In the first three paragraphs of this page, change the term "interfering analyte" to "a known interfering analyte, iron, ..."
12. **Page 3-37, Section 3.4.1.** In the last sentence of the first paragraph, a reference should be provided for the "newly proposed SCTL" statement or the statement should be removed. See General Comment No. 1 above.
13. **Page 4-8, Section 4.3.1.** No CD was provided. The fourth sentence of the second paragraph should be revised as follows: "Nondetects were rejected because the instrument used for the analysis was not detecting low-level acetone sufficiently."
14. **Page 4-11, Section 4.3.2.1.2.** In the second sentence at the top of the page, change the word "in" to "for".