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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 4 PROJECT
COMPLETION REPORT SOLAR REMEDIATION SYSTEM PILOT STUDY NAS WHITING
FIELD FL
2/6/2004
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 6, 2004

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# FL2170023244

Dear Ms. Martin:

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

- **Project Completion Report, Solar Remediation System Pilot Study, Site 4 – North AVGAS Tank Sludge Disposal Area, Revision 00** (Tetra Tech NUS, Inc. November 2003)

Enclosed are the EPA's comments based on this review. In general, I agree with the findings of the report; however, the comments should be addressed before the document is finalized. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

A handwritten signature in black ink that reads "Craig A. Benedikt".

Craig A. Benedikt
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP
Amy Twitty, CH2M Hill

**EPA Review Comments
Project Completion Report
Solar Remediation System Pilot Study
Site 4 – North AVGAS Sludge Disposal Area
NAS Whiting Field, Milton, Florida**

1. **Page ES-1, Executive Summary:** Delete the second sentence in the second paragraph. The ROD for Site 4 has not been finalized; therefore, a final remedy for this site is still pending as of the date of this report. Reword the last sentence of the second paragraph to read: "The focus of the pilot study was to evaluate the effectiveness of the SRS units in treating the vertical and horizontal extent of contamination at Site 4."
2. **Page ES-3, Executive Summary:** In the first sentence on this page, change the word "bugs" to "insects". The word "bugs" has the connotation of meaning problems in the way systems run. The sixth paragraph on this page should reflect information evaluated in the FS and not the ROD; since as stated previously, the ROD has not yet been finalized as of the date of this report.
3. **Page 1-1, Section 1.2:** The last sentence of the first paragraph should be reworded to state the ASTs are used to provide fuel for government vehicles.
4. **Page 1-4, Section 1.4:** Add a sentence to the end of the second paragraph to state that the selection of a final remedy for Site 4 is still pending as of the date of this report.
5. **Page 1-5, Section 1.5:** Change "will be" to "is being" in the first sentence of the third paragraph.
6. **Page 2-1, Section 2.1.1:** In the sixth sentence of the second paragraph, change the word "was" to "is" so the sentence states "groundwater is being...". In the seventh sentence, add the word "being" after the word "are".
7. **Page 2-2, Section 2.1.2:** Delete the second paragraph of this section. The settlement of the LUC dispute between DoD and EPA does not include the MOA requirement.
8. **Page 3-4, Section 3.4.1:** In the fourth sentence of the third paragraph, change the word "ROD" to "RI".
9. **Page 3-19, Section 3.8:** In the first sentence of the second paragraph at the bottom of the page, change the word "possible" to "possibly".
10. **Page 3-21, Section 3.10:** In the first sentence of this section, revise the wording to read, "The focus of the pilot study was to evaluate the effectiveness of the SRS units in treating the vertical and horizontal extent of contamination at Site 4."

11. **Page 3-85, Section 3.14:** In the fourth sentence of the first paragraph of this section, change the word "evaluation" to "evaluate".
12. **Page 7-1, Section 7.1:** The last sentence of the third paragraph should make a definitive statement, such as "the datalogger and associated sensors were calibrated per manufacturer's specifications."
13. **Page 7-1, Section 7.2:** Revise the second sentence of this section for clarity, it is fragmented. In the fourth sentence of this section, change the word "bugs" to "insects". (See the previous comment.)
14. **Page 7-1, Section 7.3:** In the third sentence of the first paragraph, change "will be" to "is being".
15. **Page 8-1, Section 8.1:** Since the ROD has not been finalized, this section of the report should present the findings of the FS related to soil venting.
16. **Page 8-1, Section 8.3:** Present a comparison of the cost to implement the pilot study to the estimate in the FS.
17. **Page 8-2, Table 8-1:** This table should compare costs presented in the FS and not the ROD; since the ROD is not yet final.
18. **Pages 8-8 thru 8-10, Table 8-2:** This table should compare costs presented in the FS and not the ROD; since the ROD is not yet final.
19. **Page 9-1, Section 9.2:** Based on the information presented in this report, these successes are really findings of the pilot study and should not be listed as successes in this report. Typically, pilot study reports do not include a list of successes.
20. **Page 10-1, Section 10.0:** This section of the report should contain a definitive statement regarding whether or not the SRS units are suitable for the remediation of Site 4. Take into consideration the nine criteria EPA utilizes to evaluate remedial alternatives.