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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 3 RECORD OF DECISION  
NAS WHITING FIELD FL  
6/18/2004  
U S EPA REGION IV



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

June 18, 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:

- **Record of Decision for Surface and Subsurface Soil at Site 3, Underground Waste Solvent Storage Area, Naval Air Station Whiting Field, Rev. 0, June 2004 (Tetra Tech NUS, Inc.)**

Enclosed are the EPA's comments based on this review. Please note the comments include those based on my review of the document as well as those provided by Susan Capel, EPA attorney. 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

**EPA Review Comments**  
**Site 3, Underground Waste Solvent Storage Area**  
**Rev. 0, June 2004**

1. **Section 1.2, Page 1-1:** Add a statement stating the groundwater will be addressed as a separate site, Site 40.
2. **Section 1.3, Page 1-1:** Include a reference for each publication used as a source for screening values. This section states that chromium, iron and vanadium exceeded screening values for residential use, but the text does not include any further discussion. Please include text describing why these constituents were eliminated from further consideration? Also, the reason for eliminating arsenic as a constituent of concern is discussed on page 2-3 but arsenic not identified as exceeding screening levels in this initial section
3. **Section 1.3, Page 1-5:** Describe the changed site conditions described in the first paragraph. Later portions of this document refer to a change in the risk criteria, not field conditions, which resulted in a No Further Action determination.
4. **Section 1.5, Page 1-5:** The ROD guidance has an abbreviated format for No Action RODs on page 8-5. Per this outline, there is no need for Statutory Determinations. Instead, state that no remedial action is necessary to ensure protection of public health and the environment.
5. **Section 1.6, Page 1-6:** Winston A. Smith is now the Division Director. Please change the signature page accordingly.
6. **Section 2.1, Page 2-1:** Please include a brief explanation as to why the waste solvent tanks were not regulated as a hazardous waste storage units since they were in operation on November 1980 and meet the definition of “tank” under 40 C.F.R. Part 260.
7. **Section 2.2.2, Page 2-3:** In the second sentence of the last paragraph, please delete the word “site” which appears in the phrase “site conditions” since this suggests an actual change in the field rather than a change in the criteria for evaluating risk. Likewise, delete the phrase “at the site” for the 2<sup>nd</sup> sentence, last paragraph on page 2-6 and wherever else this term or like terms are used.
8. **Section 2.3, Page 2-6:** This section should be revised to state the site related documents were made available to the public for review rather than presented to the public via advertised RAB meetings. Delete the second to the last sentence in the third paragraph of this section.
9. **Section 2.4, Page 2-6:** Please see page 6-8 of the ROD guidance. This section should convey the scope and role of the operable unit within the context of the overall site management plan. A discussion of risk specific to the unit is not appropriate here, especially when the preceding text has not included any contextual discussion about calculation of risk or the meaning of the risk numbers.

10. **Section 2.5.1.2, Page 2-8:** Provide a brief description of how screening levels are used; include a reference for their source and the land use upon which they are based. The first paragraph of this section is fragmented into two sections. Please remove the space between the two sections.
11. **Section 2.5.1.3, Page 2-8:** The acronym “TPH” is not defined in the previous text, please spell out. Also, why has the basis for the screening numbers changed from residential to commercial/industrial, as stated in the last paragraph on page 2-8?
12. **Section 2.6, Page 2-10:** Please include a brief discussion about how risk is calculated and the meaning of the risk numbers. The ROD guidance contains example text that can be used.
13. **Section 2.6.1, Page 2-10:** Please justify why a 0-102 foot soil range was used for the human health risk, as stated on page 2-10. Also indicate the basis in terms of land use upon which the statement “no unacceptable risk” is based both here and elsewhere in this document.
14. **Section 2.6.1.4, Page 2-13:** Include statutory or regulatory cites for the acceptable risk ranges stated here. Also, distinguish between the basis for action and the cleanup range. It is my understanding that the risk range cited for FDEP is the cleanup level, not the contaminant concentration triggering a remedy. In Section 2.6.1.4, the text states that per FDEP a ELCR greater than 1.0E-06 is unacceptable; however, Section 2.6.1.5 states a 1.1E-06 ELCR for residents is acceptable. Please address this discrepancy.
15. **Section 2.6.3, Page 2-15:** Qualify first statement based on land use. See previous comment regarding why 1.1E-06 ELCR is acceptable as it relates to the second paragraph.
16. **Section 2.7, Page 2-16:** Delete the term “site” used in the phrase “site conditions” in the second paragraph of this section. Site conditions have not actually changed. Arsenic was determined to be naturally occurring and screening standards changed.