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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 6 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 6, South Transformer Oil Disposal 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 EPA attorney, Susan Capel. 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 6, South Transformer Oil Disposal Area
Rev. 0, June 2004

1. This ROD is a “No Further Action” ROD because the soil removal occurring in May 2002 is considered an early action that resulted in the final determination as to risk. This term should be changed wherever it is used in the document.
2. **Section 1.2, Page 1-1:** This section should state groundwater is being addressed as a separate unit.
3. **Section 1.3, Page 1-1:** Briefly describe the conditions that led to the need for the investigation. This section does not need to include the detailed information on chemicals of concern or risk assessment. If you prefer to keep this type of information in this section, you should include informative text qualifying the terms used and the risk numbers.
4. **Section 1.3, Page 1-1 to 1-4:** Describe the “changed site conditions” precipitating the new risk assessment. Soil removal is considered a changed site condition but revision of the risk criteria is not considered a changed site. Please clarify and modify the text where required.
5. **Section 1.4, Page 1-4:** As stated above, the soil removal action is part of the final remedy and this ROD should be characterized as a “No Further Action” ROD rather than a No Action ROD. In addition, in the last sentence of the second paragraph, insert “surface and subsurface” in between the words “for” and “soil”.
6. **Section 1.6, Page 1-6:** Winston A. Smith is now the Division Director. Please change the signature page accordingly.
7. **Section 2.2.1, Page 2-1:** Exchange the position of the two paragraphs. As currently written, revise the second sentence of the second paragraph as follows: “Following the listing of NAS Whiting Field on the NPL, remedial response activities have been conducted pursuant to CERCLA authority.”
8. **Section 2.2.2, Page 2-1:** Describe all activities that resulted in the generation of waste at the site. Describe the use of the AVGAS Tank shown on Figure 2-1. According to the text in this section, elevated organic compound concentrations are most prevalent in the shallow soil in the area adjacent to the Midfield Hangar apron but the site boundary depicted in Figure 2-1 does not appear to encompass this area. Please clarify and revise where necessary. Also, indicate the direction of flow in the ditch.
9. **Section 2.2.2, Page 2-3:** The discussion beginning on page 2-3 concerning a change in conditions should be reserved for the Summary of Site Risks section since it discusses changes related to risk.
10. **Section 2.3, Page 2-4:** The second paragraph of this section appears fragmented. Please revise as appropriate. In the third paragraph, the text should state site related documents were placed in the information repository and made available for the public to review rather than being presented at advertised RAB meetings.
11. **Section 2.4, Page 2-4 to 2-7:** Scope and Role of Remedial Action - This section should convey the scope and role of the operable unit within the context of the entire site plan. Please see page 6-6 of the ROD guidance for points of topic and example language.

12. **Section 2.5, Page 2-7:** Earlier text states that elevated concentrations of constituents were found in soils adjacent to the hangar. Please explain why the boundary of the unit does not extend to the edge of the hangar foundation.
13. **Section 2.5.1, Page 2-7:** The “changed site conditions” consist of soil removal and should be described as such in this section. Changes in risk criteria do not constitute changes in site conditions. Please revise this section to address this comment.
14. **Section 2.5.1.2, Page 2-8:** This section states chromium and vanadium were detected in surface soil samples at levels exceeding the USEPA PRG which appears to be the more conservative screening value; however, the text does not indicate why these constituents do not require further action. Were constituent concentrations averaged over the entire 119-foot soil profile? Explain why the soil profile was conducted to such depths. Indicate the groundwater elevation in the area.
15. **Section 2.5.1.3, Page 2-8:** This section states chromium and vanadium were detected in subsurface soil samples at levels exceeding the USEPA PRG which appears to be the more conservative screening value; however, the text does not indicate why these constituents do not require further action.
16. **Section 2.5.3, Page 2-9:** Earlier text states chromium and vanadium were detected in post removal sampling. However, they are not listed as COCs in this section. The text should address why chromium and vanadium do not warrant further action. Rather than stating that there are no constituents of concern, state that removal of the soil removed a source and migration pathway.
17. **Section 2.6, Page 2-10:** Include language explaining how the risk assessment is conducted and the meaning of the risk numbers generated. The ROD guidance contains example text on page 6-21. The ROD guidance presents the minimum amount of information that should be presented when presenting risk information at the site. Specifically, see Tables 6-15 through 6-21.
18. **Section 2.6.1, page 2-11:** In the second full paragraph, the text states that the FS Addendum was designed to show no risk and that the rationale used differs from the original risk assessment. These statements create doubt as to whether the revised risk assessment is a reliable indicator of risk. Again, it suggests that constituent concentrations were averaged over the entire 119-foot soil profile, rather than a more reasonable interval. Please provide more information to justify the change in approach to the risk assessment.
19. **Section 2.6.1.3, Page 2-21:** The first sentence of this section appears fragmented and incomplete. Please revise as necessary.
20. **Section 2.6.1.4, Page 2-13:** The first and third sentences in this section appear to be fragmented and incomplete. Please revise as necessary.
21. **Section 2.6.1.6, Page 2-14:** In the first sentence of the second paragraph, the text states the number of soil samples was 17 (20 for some PAHs). It is unclear what is meant or intended by this statement. Please revise for clarity. In the sixth sentence of the second paragraph, insert the word “in” after “...are presented”.
22. **Section 2.6.3, Page 2-16:** In the second paragraph, explain how the non-carcinogenic risk for target organs operates to mitigate the non-carcinogenic HI.
23. **Section 2.7, Page 2-16:** Qualify assumed land use when concluding that no action is necessary, as stated on page 2-17.