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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV APPROVAL OF DRAFT FIVE YEAR REVIEW
NAS WHITING FIELD FL
3/7/2005
U S EPA REGION IV

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

March 7, 2005

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 (electronically) and reviewed the following document:

- **Draft Initial 5-Year Review Report for NAS Whiting Field, Milton, FL.**

Please be aware that due to a clerical error the Record of Decision (ROD) concurrence letters for Sites 1 and 2 were incorrectly dated October 5, 1999. The correct EPA ROD concurrence date for Sites 1 and 2 should be recorded as September 29, 1999. Please correct your records as appropriate.

Enclosed are EPA's review comments. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP

EPA Review Comments
Initial 5-Year Review Report
For
NAS Whiting Field, Milton, FL
March 7, 2005

1. In general, this document should be carefully reviewed for formatting and grammatical errors. There are numerous errors which are not addressed in this letter.
2. The document should have a title page which lists the document title, facility name, location, and EPA ID number.
3. An "Executive Summary" should be included which summarizes the main points of the document.
4. The document should be arranged as follows: title page, table of contents, acronyms, executive summary, 5-year review summary form, the main body of the report, and any necessary appendices.
5. **Page iii, Key Review Information:** According to the *Comprehensive Five-Year Review Guidance, June 2001*, the trigger action date for a site requiring no onsite physical activities such as land use controls is the date the Record of Decision (ROD) is accepted by EPA. In this case, the trigger action date would be the EPA's ROD signature date of September 29, 1999. Accordingly, the 5-year review due date should be September 29, 2004.
6. **Page iv, Recommendation and Follow-up Actions:** In the first bulleted item for Site 1, delete the "I" after the "(LUC)".
7. **Page iv, Protectiveness Statements:** The protectiveness statement for Site 1 should make a more definitive statement as to whether the LUCs are protective of human health and the environment.
8. **Page vii, Acronyms:** The acronym for "Focused Feasibility Study" should be "FFS" since "FS" denotes a full feasibility study. The acronym "LURA" and its associated definition should be deleted. This acronym is of limited use in the document.
9. **Page 1-3, Section 1.0:** In the second sentence of the first paragraph, change "the site" to "each site". The fourth sentence should state that disposal practices do not allow for unrestricted use, unlimited exposure at the sites.
10. **Page 1-4, Section 1.1:** Delete the word "official" in the first sentence. Delete the entire second sentence of this section. The fact that services and support are provided by private contractors is not relevant to the overview of Whiting Field or this 5-year review.

11. **Page 1-4, Section 1.2:** Move the third paragraph to the beginning of the section. Revise the second sentence of the first paragraph as follows: "The installation was commissioned as the Naval Auxiliary Air Station Whiting Field in July 1943 and has since served as a naval aviation training facility." The third sentence of the first paragraph should be revised as follows: "The field's mission is to provide primary fixed-wing, propeller-driven aircraft and advanced helicopter training." In the first sentence of the second paragraph of this section, insert the word "lands" after the word "forested". In the third paragraph of this section as the report is currently written, delete the third sentence as this information is redundant. In the first sentence of the fourth paragraph, delete the following: "..., a facility listed on the National Priorities List (NPL)..." This information will be redundant based on requested revisions to this section. In the second sentence of the fourth paragraph, change "investigation" to "investigations" and insert the word "which" after the word "program".
12. **Page 1-5, Section 1.2:** Revise the last sentence of the first paragraph on this page as follows: "Therefore, NAVFAC EFD SOUTH has the responsibility to process each site at NAS Whiting Field through preliminary assessment, site inspection, RI/FS, and remedial action." Move the last sentence on this page to the beginning of the fourth paragraph on page 1-4.
13. **Page 2-1, Table 2-1:** The "Final ROD selecting remedy is accepted by EPA" date should be September 29, 1999, not October 5, 1999.
14. **Page2-2, Section 2.2.1:** In the third sentence of the first paragraph, insert "characterized by" in between "is" and "a". In the fourth sentence of the first paragraph, change "covers an area" to "is". In the fifth sentence of the first paragraph, delete the words "some" and "ground". In the sixth sentence of the first paragraph, delete "in erosional area" and "other".
15. **Page 2-2, Section 2.2.2:** In the first sentence of the first paragraph, insert "reportedly" in between "Site 1" and "involved". In Item #1, revise the first sentence as follows: "The site may be utilized for activities involving less than full-time contact with the soil onsite." Item #2 should refer to the ROD and the implementation plan included in the ROD rather than the LUC memorandum of agreement which is no longer in effect. Item #3 refers to the "above soil cleanup goal"; however, it is not clear which goal is being referenced. Please provide clarification.
16. **Page 2-4, Section 2.2.3:** This section refers to human health constituents of potential concern (HHCPCs) and ecological constituents of potential concern (ECPCs); however, since a baseline human health risk assessment and ecological risk assessment were conducted, these constituents should be referred to as human health constituents of concern (HHCOCs) and ecological constituents of concern (ECOCs), respectively.
17. **Page 2-4, Section 2.2.4:** Revise the second sentence of the first paragraph for clarity.
18. **Page 2-5, Section 2.2.4:** In the first sentence at the top of the page, the text states the NCP was amended by SARA. CERCLA was amended by SARA, not the NCP. The last sentence of this section states the ROD was accepted by EPA in October of 1999; however, the ROD was signed by EPA on September 29, 1999, which signifies its acceptance.

19. **Page 2-5, Section 2.2.5:** This section of the report should provide much more information regarding the findings contained in the human health and ecological risk assessments. For example, the text lists the COCs; however, more information should be provided regarding the level of risk associated with each COC. The additional information will allow the reviewer to better understand why the risk at the site is being managed with land use controls. In the first sentence "HHCPCs" should be "HHCOCs". In the second sentence, "ECPCs" should be "ECOCs". The fourth sentence should state that aluminum and iron exceed federal and State secondary maximum contaminant levels. It is unclear why it is not advisable to use the groundwater at Site 1 for non-potable uses. Please provide clarification on why this is the case. In the fifth sentence, insert the word "the" between "under" and "Site". In the sixth sentence, insert the word "the" after the word "considering" and insert a comma after the word "any".
20. **Page 2-5, Section 2.3.1:** In the first sentence of the first paragraph, change "5 October 1999" to September 29, 1999. In the second sentence of the first paragraph, insert "to" in between "Site 1" and "establish". The first paragraph refers to the land use control memorandum of agreement which is no longer in effect as the result of the resolution of the land use control dispute between EPA and DoD. This section should instead refer to the requirements contained in the ROD and the associated land use control implementation plan. In the third sentence of the second paragraph, change to the word "limiting" to "restricting". Delete the fourth sentence of the second paragraph which refers to the memorandum of agreement. (See previous comments)
21. **Page 2-6, Section 2.3.2:** Revise the second sentence of the second paragraph as follows: "The LUC will apply until or unless site remediation is conducted to restore the site for unrestricted use, unlimited exposure."
22. **Page 2-7, Section 2.4.4:** Delete the first sentence of this section. The information is presented in more detail later in the section. In the second sentence of the first paragraph, add "at the site" after the word "values".
23. **Page 2-8, Section 2.4.4:** In the first sentence at the top of the page, change "CoC" to "COC". Due to the unknown or undocumented nature of past waste disposal practices at Site 1; the statements made in the second paragraph of this section cannot be made with certainty.
24. **Page 2-8, Section 2.5:** In the first bulleted item of Question A, change the word "function" to "functioning". In the second bulleted item, delete the word "finding". In the third bulleted item, change "are indications of" to "do not indicate". In the first item under Question B, insert the word "than" after "higher" in the second sentence and change "CoCs" to "COCs". The third sentence in the first item under Question B should be deleted. This information is included in greater detail later in the paragraph. Due to the unknown or undocumented nature of past waste disposal practices at Site 1; the statements made in the second paragraph of this section cannot be made with certainty. In the second item under Question B, change the word "affect" to "affecting".

25. **Page 2-10, Section 2.8:** Change "LUC" to "LUCs". Insert the word "uses" after "nonresidential". Delete "the finding" after the word "reporting".
26. **Page 3-1, Section 3.0:** The first sentence states the implementation of the remedial actions at Site 2 began in 1985. It is unclear how remedial actions could begin before the investigation of the site is completed. The third sentence of this section should be revised as follows: "This statutory review is required by regulation because wastes are still contained onsite and do not allow for unrestricted use and unlimited exposure."
27. **Page3-1, Table 3-1:** The "Final ROD selecting remedy is accepted by EPA" date should be September 29, 1999, not October 5, 1999.
28. **Page 3-2, Section 3.2.1:** In the second sentence of the first paragraph, insert "characterized by" in between "is" and "a" and insert "the" in between "and" and "bottom". In the fifth sentence, add "the" in between "from" and "perimeter".
29. **Page 3-4, Land and Resource Use:** In the second paragraph, add the word "acceptable" in between "current" and "land". In Item #1, the word "sites" should be "site". Item #2 should refer to the ROD and the LUCIP, since the LUC MOA is no longer in effect. In Item #3 there is no defined soil cleanup goal listed above. More clarification is needed so this statement can be made or the statement should be removed.
30. **Page 3-5, Section 3.2.2:** In the fifth sentence, "human health constituents of potential concern (HHCPCs)" should be changed to "human health constituents of concern (HHCOCs)". In the sixth sentence, "ecological constituents of potential concern (ECPCs)" should be changed to "ecological constituents of concern (ECOCs)".
31. **Page 3-5, Section 3.2.3:** In the third sentence of the second paragraph, the text should state that CERCLA was amended by SARA, not the NCP. In the last sentence of the second paragraph, the text should state that the ROD was accepted by EPA on September 29, 1999.
32. **Page 3-5, Section 3.2.4:** In the first sentence, "HHCPC" should be "HHCOC". In the second sentence, "ECPCs" should be "ECOCs". The third sentence of this section should refer to the ROD and the associated LUCIP, not the memorandum of agreement. In the fourth sentence, insert the word "secondary" after "State". It is unclear why the groundwater cannot be used for non-potable purposes as stated in the fourth sentence.
33. **Page 3-6, Section 3.2.4:** At the top of this page, insert the word "the" after the word "under".
34. **Page 3-6, Section 3.3.1:** In the first sentence of the first paragraph, change October 5, 1999, to September 29, 1999. The fourth sentence of the first paragraph should reference the ROD and associated LUCIP rather than the memorandum of agreement. List the RAOs for this site following this paragraph. In the fourth sentence of the second paragraph, refer to the ROD and the LUCIP rather than the MOA. In the fifth sentence of the second paragraph, change "is" to "continues to be".
35. **Page 3-7, Section 3.3.1:** In the paragraph at the top of page, delete "Proposed Plan" from the first sentence. The Proposed Plan is not enforceable. Add "...and unlimited exposure" to the end of the second sentence.

36. **Page 3-8, Section 3.4.2:** Change the word "Inspections" to "Inspection".
37. **Page 3-8, Section 3.4.3:** Add "…, respectively." to the end of the sentence.
38. **Page 3-8, Section 3.4.4:** In the first sentence, change "CoC" to "COC" and change "as Site 2" to "at Site 2".
39. **Page 3-8, Section 3.5:** In the second bulleted item under Question A, add the word "uses" between "nonresidential" and "notation" and delete the word "findings".
40. **Page 3-9, Section 3.5:** Insert a bullet for the first item under Question B. In the second sentence of the first item under Question B, insert the word "than" after "higher".
41. **Page 3-10, Table 3-2:** The table should identify the need to complete an ESD as a follow-up action. ESD should be defined as it is the first occurrence of the abbreviation in the document.
42. **Page 4-1, Section 4.3:** This section should list the need to complete an ESD for Site 2 as a future recommendation.