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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 5 FEASIBILITY STUDY
NAS WHITING FIELD FL
5/16/2005
U S EPA REGION IV

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

May 16, 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:

- **Feasibility Study for Surface and Subsurface Soil at Site 05, Rev. 0, March 2005, NAS Whiting Field, Milton, FL** (Tetra Tech NUS, Inc.).

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
Feasibility Study
Surface and Subsurface Soil at Site 05
Rev. 0
NAS Whiting Field, Milton, FL
March 2005

1. **Title Page:** Please insert the EPA ID number on the title page of the document.

2. **Page vii, Acronyms:** COCs should be defined as Constituents of Concern. COPCs should be defined as Constituents of Potential Concern.

3. **Page viii, Acronyms:** Change the acronym "RA" to "BRA" and the definition of the term to "Baseline Risk Assessment". RA typically denotes "Remedial Action". While it is not incorrect to use the term "screening level ecological risk assessment" (SERA), the more widely used generalized term "ecological risk assessment" (ERA) is more appropriate.

4. **Page ix, Foreword:** In the first sentence of the fourth paragraph, change "...where chemicals were allegedly spilled or disposed" to "...with suspected releases of hazardous substances." The second sentence of the fourth paragraph should be revised for accuracy. The PA serves to compile historical information for the site while the SI serves to confirm the presence of hazardous substances in environmental media. In the third sentence of the fourth paragraph, change "the selected" to "potential".

5. **Page ES-1, Executive Summary:** Delete the second sentence of the first paragraph. This information is more appropriate to the section of the document related to the RI/FS process. The executive summary should provide a concise summary of the information related to Site 5 contained in the report and not focus on the RI/FS process information. In the second sentence of the fourth paragraph on this page, delete "0-2 inch" unless further clarification is provided to define what is meant by this term.

6. **Page 1-1, Section 1.0:** In the first sentence of the fourth paragraph, change "source" to "nature and extent" and add the word "the" between "for" and "remedial". In the fourth bulleted item at the bottom of the page, change "selection" to "identification" and "each" to "the".

7. **Page 1-2, Section 1.0:** Revise the second bulleted item at the top of the page as follows: "A qualitative and quantitative assessment of risks to human health and the environment which leads to the identification of site specific contaminants of concern." In the first paragraph of this page, the text states one of purposes of the FS is to identify COCs. Identifying COCs is not one of the functions of the FS. COCs are identified during the remedial investigation (RI) phase and the associated baseline risk assessment. The statement regarding the FS serving to identify COCs is incorrectly made through the document and should be revised accordingly.

8. **Page 1-2, Section 1.1:** The first two paragraphs of this section contain incorrect information related to COC identification in the FS. Please see previous comment.

9. **Page 1-4, Section 1.1:** In the paragraph immediately following the "Balancing Criteria", the text states there is a public comment period for the FS. This statement is not correct. The remedy selection process provides a public comment period for the proposed plan not the FS. In the second paragraph below the "Modifying Criteria", the text states comments are received on the FS and proposed plan during the public comment period. Since the FS is not subject to a public comment period, no comments would be received for the FS.

10. **Page 1-6, Section 1.3:** The last sentence of the first paragraph relates to Figure 1-2 which shows soil boring locations. It is not clear to the reviewer what purpose this figure serves in the FS. A figure of this type is typically found in the remedial investigation report. The text should provide further information related to the need for this figure or the figure should be removed.

11. **Page 1-6, Section 1.4:** In the last sentence of the first paragraph, delete the word "selection". In the first sentence of the second paragraph, insert the word "health" in between "human" and "and".

12. **Page 1-8, Figure 1-2:** Please see previous comment related to this figure.

13. **Page 1-9, Section 1.5:** In the second sentence of the first paragraph, delete "COCs". Please see previous comment related to COC identification in the FS.

14. **Page 2-1, Section 2.0:** In the second and third sentences of the second paragraph, it is not readily apparent what is meant by the term "0-2 inch ditch". Please clarify. Revise the second sentence of the third paragraph as follows: "As a result, the investigation of Site 5 was reopened." Delete the third sentence of the third paragraph.

15. **Page 2-1, Section 2.1.1:** The second paragraph of this section describes Table 2-1. If a table of this type is to be included in the FS, it should identify COCs not COPCs. COPCs were previously identified in the RI at which time a baseline risk assessment was conducted to determine COCs.

16. **Page 2-2, Table 2-1:** See previous comment above.

17. **Page 2-3, Section 2.1.2:** Rename this Section "Risk Assessment Results".

18. **Page 2-3, Section 2.1.2.1.1:** The purpose of the FS is to present remedial alternatives and should not propose or recommend a specific remedy. The remedy is proposed in the Proposed Plan.

19. **Page 2-3, Section 2.1.2.1.2:** See comment above as it relates to recommending remedies in the FS.

20. **Page 2-3, Section 2.1.2.2:** This section should provide a rationale as to why the subsurface soils were not sampled. In addition, it is not acceptable to state that since a particular contaminant was not detected at one site that it would therefore not be expected to be detected at another site. Contaminant concentrations can vary both in horizontal and vertical extent; and therefore, lead to different spatial distributions even in similar soil types.

21. **Page 2-4, Section 2.1.2.3:** Spell out the definition for the abbreviation "SERA" in the text (i.e. Screening Level Ecological Risk Assessment).

22. **Page 2-8, Section 2.2.2:** In the second sentence of the first paragraph, change "COPCs" to "COCs"; and in the third sentence, change "SERA" to "ERA".

23. **Page 2-9, Section 2.2.2:** In the second sentence at the top of the page, insert the word "anticipated" in between "future" and "use"

24. **Page 2-9, Section 2.2.3:** The fifth sentence in the first paragraph is incorrect. COCs are determined during the risk assessment process not during the development of remedial goals. COCs must be determined prior to the FS in order to develop remedial goals based on COCs. In the fourth sentence of the second paragraph, insert the word "anticipated" in between "future" and "use".

25. **Page 2-10, Section 2.2.4:** This section is not relevant to the FS. Since COCs were determined during the RI and the associated risk assessment, it would suffice to state whether or not COCs exist for the site.

26. **Page 2-14, Section 2.3.3:** The third paragraph of this section requires revision based on formatting. In addition, in what is currently the seventh sentence of the third paragraph, the text discusses natural attenuation processes degrading the constituents. This statement should not be made unless it has been demonstrated that natural attenuation processes are indeed taking place at the site.

27. **Page 2-15, Section 2.3.4:** The last sentence of the second paragraph should be revised as follows: "Soils needing to be removed will be taken to an approved off-site disposal facility."

28. **Page 2-16, Section 2.3.4:** Change "Regulations" to "regulations" at the top of the page.

29. **Page 2-18, Section 2.4.1.1.1:** The first paragraph of this section refers to the process of natural attenuation; however, the Agency considers natural attenuation and its associated monitoring to be a remedial action. Since natural attenuation is considered an action, the description of natural attenuation in the discussion of the no action alternative is not appropriate. Remove the reference to natural attenuation from this section. In addition, the no action alternative does not require a 5-year review. Please remove the reference to the 5-year review from this section. For further information, please refer to the 5-year review guidance.

30. **Page 2-19, Section 2.4.1.1.2:** Delete the last sentence at the top of the page which refers to 5-year reviews. In addition, delete the reference to natural attenuation in the first full paragraph on this page. See previous comment. Since there is no requirement for a 5-year review, there would be no costs associated with it in the "Cost" section.

31. **Page 2-20, Section 2.4.1.2.2:** In the second paragraph of this section under "Balancing Criteria", it is unclear to the reviewer how long-term reliability would be maintained because natural surface flow patterns would be unchanged and erosion would be minimized as it relates to land use controls. Additional clarification should be provided or the statement should be removed.

32. **Page 2-21, Section 2.4.1.2.2:** Delete the discussion of natural attenuation in the first paragraph on this page. Land use controls are being evaluated in this section, not natural attenuation. Natural attenuation is considered a separate remedial option by the Agency. In the fourth sentence of the fourth paragraph on this page, delete "...and on the reduction of constituent concentrations as a result of natural attenuation." This paragraph should only evaluate land use controls. In the paragraph addressing cost, the text should state that the costs associated with this remedy cover a 30-year period.

33. **Page 2-22, Section 2.4.1.3.1:** In the fifth sentence of this section, insert the word "approved" in between "an" and "off-base".

34. **Page 2-22, Section 2.4.1.3.2:** In the "Long Term Effectiveness and Permanence" subsection in the "Balancing Criteria" discussion, it is unclear to the reviewer how "the degree of long-term effectiveness and permanence provided by Alternative S05-3 is low since contaminants are not treated" when the purpose of this section is to discuss the alternative involving removal of impacted soils.

35. **Page 2-24, Section 2.5:** The last sentence of the second paragraph should be revised. The responsiveness summary is prepared in response to comments received during the public comment period in conjunction with the proposed plan.

36. **Page 2.27, Table 2-9:** The No Action alternative does not require a 5-year review.

37. **Page 2-29, Table 2-9:** Since there is no requirement for a 5-year review with the No Action alternative, there would be no costs associated with a 5-year review with the No Action alternative.

38. **Page 2-30, Section 2.5.3:** The second sentence of the "Magnitude of Residual Risks" subsection should be revised as follows: "Alternatives S05-2 and S05-3 would require 5-year reviews."

39. **Page 2-33, Section 2.5.8:** Revise the second sentence of this section to state that State comments will be addressed in the final FS for Site 5.

40. **Page 2-33, Section 2.5.9:** This section should state that community acceptance is addressed upon receipt of public comments on the Proposed Plan, not the FS.