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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 5 RECORD OF DECISION
NAS WHITING FIELD FL
6/10/2005
U S EPA REGION IV

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

June 10, 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:

- **Record of Decision, Site 05, Battery Acid Seepage Pit, 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
Record of Decision
Site 05, Battery Acid Seepage Pit
Rev. 0
NAS Whiting Field, Milton, FL
March 2005

1. **Page 1-1, Section 1.2:** The first sentence of this section should state that this document presents the selected remedy for Site 5 as No Action for surface and subsurface soils. The Proposed Plan serves to propose the remedy not the Record of Decision (ROD). This section should also identify the land use assumed here and throughout the ROD when stating that no action is required or that the site poses no risk. The text should make a definitive statement such as no action is required under a residential land use scenario which allows for unlimited exposure and unrestricted use of surface and subsurface soils at Site 5.
2. **Page 1-1, Section 1.3:** The second sentence of the first paragraph of this section is incorrect. COPCs and, additionally, COCs are identified in the remedial investigation and the associated risk assessments not in the feasibility study.
3. **Page 1-2, Figure 1-1:** A larger map should be used to depict the site's location on the installation property.
4. **Page 2-1, Section 2.2:** State why the facility initiated environmental investigations prior to being placed on the National Priorities List (NPL). Explain why the FDER order for the seepage pit was "closed". The document says FDER issued a NOV for disposal of hazardous waste. If that is the case, then the site should have gone through closure. If clean closed, then it is understandable why the rest of the remedial action was carried out under CERCLA. If it didn't clean close, the facility should have obtained a RCRA permit; however, there is no mention of a permit in the document. At the very least, the document needs to discuss the RCRA closure of the unit. If a permit was not obtained, explain why the facility did not need a RCRA permit for the land disposal unit.
5. **Page 2-3, Section 2.2.2:** At the top of this page, the ROD refers to the FDER Consent Order; however, this is the first time the consent order is mentioned in the document. Please provide additional information pertinent to the consent order such as the reason for the order, when the order was originally issued, what was the order intended to address, what work was completed to address the terms of the order and why the order was closed.
6. **Page 2-5, Section 2.4:** Reword the first sentence of this section. There is disagreement between the subject and the verb. (i.e. Site 05 addresses....)
7. **Page 2-5, Section 2.5.1:** The first sentence of the third paragraph is not correct. Recommendations for remedial action are not made in the feasibility study. The Proposed Plan serves to present recommendations for remedial action.
8. **Page 2-6, Section 2.5.1.1:** Identify the three COPCs mentioned in the text. The last sentence of the first paragraph is incorrect. Risks are not identified in the FS but rather in the RI and associated risk assessments.

9. **Page 2-6, Section 2.5.1.2:** The statements in this section cannot be made with complete certainty. It is not acceptable to state that because pesticides/PCBs were not detected at Site 6 they would not be expected in the subsurface at Site 5 without analytical data to back up this premise. The statements made regarding leaching apply to Site 6 not Site 5 which is the subject of this ROD.
10. **Page 2-6, Section 2.5.3:** If no risk was identified for the surface and subsurface soils at Site 5, how can leaching to groundwater be a potential concern? This statement seems to contradict information presented previously.
11. **Page 2-6:** Include a section at the end of the "Site Characteristics" discussion to describe current and potential future land uses associated with the site.
12. **Page 2-7, Section 2.6:** Identify the land use assumed in conducting the risk assessment. This section of the ROD should state the specifics of the risk assessments. The text mentions COPCs; however, no mention is made regarding the selection of COCs from the COPCs and the level of risk presented by the COCs. The document should make definitive statements regarding whether there is any cancer risk associated with any COCs as well as non-cancer health effects.
13. **Page 2-7, Section 2.6.3:** Delete the word "potential".
14. A section should be included following the "Site Risks" section to address documentation of significant changes per the Superfund Record of Decision guidance on page 8-5.