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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 9 RECORD OF DECISION  
NAS WHITING FIELD FL  
7/12/2005  
U S EPA REGION IV



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

July 12, 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 9, Waste Fuel Disposal Pit, Surface and Subsurface Soils, 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,

A handwritten signature in black ink that reads "Craig A. Benedikt".

Craig A. Benedikt  
Senior Remedial Project Manager  
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP

**EPA Review Comments  
Record of Decision  
Site 9, Waste Fuel Disposal Pit  
Rev. 0  
NAS Whiting Field, Milton, FL  
March 2005**

1. **Page v, Acronyms:** Add an acronym for *COC* defined as “constituent of concern” and change the definition of *COPC* to “constituent of potential concern”.
2. **Page 1-1, Section 1.3:** In the first sentence of the second paragraph, delete the word “potential”. Here and throughout the document, identify the land use assumed when stating that the site poses no human health risk. For example, state that the site poses no human health risk under a residential use scenario.
3. **Page 1-2, Figure 1-1:** Provide a legend for this figure to define the major site characteristics such as the shaded areas.
4. **Page 1-3, Section 1.4:** In the last sentence of the second paragraph, insert “unlimited exposure,” in between “an” and “unrestricted”. State that no CERCLA action is necessary since the contaminants found do not pose a risk to human health and the environment based on an unrestricted use scenario.
5. **Page 1-3, Section 1.5:** State that no remedial action is necessary to ensure protection of human health and the environment based on an unrestricted use/unlimited exposure scenario.
6. **Page 2-1, Section 2.1:** In the second sentence of this section, insert “RI” in between “IIA” and “fieldwork”.
7. **Page 2-1, Section 2.2.1:** State whether the facility operates under a RCRA permit since Section 2.2.2 mentions disposal of hazardous waste after the effective date of RCRA.
8. **Page 2-3, Section 2.2.2:** In the second sentence of the first paragraph on this page, change “there after” to “thereafter”. It is unclear whether the facility was actively engaging in the disposal of hazardous waste at the time of the FDER inspection in February 1984 or whether the notice of violation was related to the disposal practices described in the first paragraph of this section. Please clarify. If the facility was actively disposing of hazardous waste in 1984, explain why this unit was not regulated under a RCRA operating permit or a post closure permit. In the second paragraph on this page, clarify whether the concentrations of inorganic compounds found at the site are within background range at Whiting Field since the sentence does not distinguish between background areas and areas under investigation. Identify current and anticipated land use specific to Site 9. Please use one of the land uses identified in the NCP.
9. **Page 2-4, Table 2-1:** Currently this table is arranged on pages 2-4 and 2-5; however, this table should be reformatted so it will fit onto one printed page. In addition, this table does not contain information relevant to the soil gas sampling which took place as part of the remedial investigation (RI). This information should be included in order to present a detailed description of the RI activities.

10. **Page 2-6, Section 2.5.1:** The first sentence of the third paragraph states that the FSA recommended NFA; however, recommendations for remedial actions are not provided in a feasibility study or feasibility study addendum. Rather, recommendations for remedial actions are proposed in the Proposed Plan and then formally selected in the record of decision (ROD). Delete the word “Therefore” in the second sentence of the third paragraph.
11. **Page 2-7, Section 2.5.1.1:** This section should state that although antimony was identified as the only COPC in the RI; it was not retained as a COC following the human health and ecological risk assessment. Therefore, there were no human health or ecological risks associated with exposure to surface soils at Site 9. Delete the reference to the FSA in the last sentence of the first paragraph. Risks are identified in the human health and ecological risk assessments, not in an FSA.
12. **Page 2-7, Section 2.5.1.2:** A discussion of the soil gas sampling which occurred during the RI should be provided in this section of the document. In addition, a valid justification for not conducting subsurface soil sampling should be provided in this section since the ROD states no action is necessary for subsurface soils. Any risks associated with exposure to subsurface soils should be discussed in this section.
13. **Page 2-7, Section 2.5.3:** Add information after this section which identifies the current and potential future site use and resource uses. This section establishes the foundation for the risk section, which in turn provides the primary basis for the no action determination.
14. **Page 2-7, Section 2.6:** More information must be included to explain why soils and subsurface soils do not require a remedy even though organic and inorganic constituents were detected. Section 6.3.7 of the ROD guidance (A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, July 1999) beginning on page 6-12 includes sample language and table formats that can be used when explaining the risk assessment and to demonstrate why the constituent concentrations do not pose a risk requiring a remedy.
15. **Page 2-8, Section 2.6.3:** Delete the word “potential” from the sentence in this section.
16. The ROD should include a section for “Documentation of Significant Changes” at the end of the Decision Summary section as per the ROD Guidance.