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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 12 PROPOSED PLAN  
NAS WHITING FIELD FL  
7/15/2005  
U S EPA REGION IV



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

July 15, 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:

- **Proposed Plan, Site 12, Tetraethyl Lead Disposal Area, Rev. 0, May 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  
Proposed Plan  
Site 12, Tetraethyl Lead Disposal Area  
Rev. 0  
NAS Whiting Field, Milton, FL  
May 2005**

1. **Page 1, Header:** The header should be revised as follows: “The Department of Defense and the Navy has completed the investigation of surface and subsurface soils at NAS Whiting Field Site 12, Tetraethyl Lead Disposal Area. The site history and current conditions indicate no treatment, or containment is necessary. Unrestricted access and unlimited exposure to surface and subsurface soils is allowed for both residential and nonresidential uses”.
2. **Page 1, The Proposal:** Identify the legal authority under which action is being taken. In the fifth sentence of the first paragraph, the text should state that the proposal was developed by the Navy and EPA with concurrence from FDEP. In the second sentence of the second paragraph, delete the word “adequate”. Remove the bold print formatting in the first sentence of the third paragraph.
3. **Page 1, Figure 1:** This figure shows the location of Site 9 not Site 12.
4. **Page 1, Site History, Current Conditions:** Delete “(Figure 1)” from the first sentence of this section. In addition, the figure at the bottom of the page should be labeled and include a legend to define the features of the figure.
5. **Page 2, Environmental History, Regulatory Framework:** Indicate the date the installation was listed on the NPL in the first paragraph. Delete the reference to the Installation Restoration Program since CERCLA is the legal mechanism triggering the need for a Proposed Plan and ROD.
6. **Page 2, Environmental History, Investigation Findings:** Delete the fourth sentence of this section as it relates to the 2001 Proposed Plan. In the first bulleted item, change the term “feasibility study” to “remedial investigation” and change “chemical” to “constituent”.
7. **Page 2, Environmental History, Soil Conditions:** The abbreviations “PRG” and “SCTL” are use in this section of the document and have not been previously defined. The last sentence of the first bulleted item is too technical and uses terms such as “non-apportioned” and “simple apportioned” which should be defined. The term “USEPA guidelines” is used; however, this term is too vague. Please provide additional information related to which guidelines were used. Also state the nature of the land use on which this statement is based (i.e. residential or industrial). Identify the calculated risk on a constituent by constituent basis based on unrestricted access, unlimited exposure land use.
8. **Page 2, Environmental History, Human Health Risks:** Present the numeric cancer risk levels for the site in this section. The second sentence of this section should make a more definitive statement regarding non-carcinogenic risk.
9. **Page 3, Environmental History, Ecological Risks:** Delete “(Figure 1)” in the second sentence of the first paragraph. Delete the phrase “potential risks are acceptable and” in the last sentence of this section.
10. **Page 3, Environmental History:** Add a section which describes the current and future anticipated land use using the land use categories used in the NCP.

11. **Page 3, Basis for the Proposal:** Add “the Feasibility Study” after “Remedial Investigation” in the first sentence. In the second sentence of this section, add “...for surface and subsurface soils” at the end of the sentence.
12. **Page 3, Public Involvement:** In the fourth sentence of the first paragraph, delete “process is”. Place a comma after “reports” in the first sentence of the second paragraph. In the fourth paragraph, insert the word “news” between “local” and “media”.
13. **Page 3, Glossary:** In the definition of *CERCLA*, revise as follows: “a Federal law enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986.” In the definition of *Remedial Investigation*, delete “and establish cleanup criteria”. Change “preferred” to “proposed” in the definition of *Proposed Plan*. The definition of *Responsiveness Summary* should be revised as follows: “a section of the ROD summarizing the public comments received during the Proposed Plan public comment period and the responses to those comments”. The definition for *Site Inspection* should be revised as follows: “an investigation phase where environmental samples are collected and analyzed to assess the presence of contamination.”