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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 12 RECORD OF
DECISION NAS WHITING FIELD FL
8/18/2005
U S EPA REGION IV



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

August 18, 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 12, Tetraethyl Lead Disposal Area, Surface and Subsurface Soils, Rev. 0, April 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 12, Tetraethyl Lead Disposal Area
Rev. 0
NAS Whiting Field, Milton, FL
April 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”. Change these terms as appropriate wherever they are used throughout the document.
2. **Page 1-1, Section 1.2:** The first sentence of this section should be revised as follows: “This decision document presents the selected remedy for Site 12 as No Action for surface and subsurface soils.”
3. **Page 1-1, Section 1.3:** The second sentence in the first paragraph of this section should be revised as follows: “One pesticide, dieldrin, was identified as a constituent of potential concern (COPC) in surface soils in the RI; however, no constituents of concern (COCs) were identified for surface soils in the associated human health risk assessment. No COPCs or COCs were identified for subsurface soils. Therefore, no human health risks were identified for exposure to surface and subsurface soils at Site 12.” It should be noted that COPCs are not identified in the feasibility study (FS) or the FS addendum, but rather in the RI and the associated risk assessments.
4. **Page 1-2, Figure 1-1:** Provide a legend for this figure to define the major site characteristics. In addition, the two figures combined into Figure 1-1 should be separated and enlarged to enhance readability.
5. **Page 1-3, Section 1.3:** In the first sentence at the top of the page, delete the word “potential”. Here and throughout the document, identify the land use assumed when stating that the site poses no human health risks. For example, state that the site poses no risk to human health under a residential use scenario.
6. **Page 1-3, Section 1.4:** In the fifth sentence of the second paragraph, change “...an unrestricted use scenario:” to “...a unrestricted use, unlimited exposure scenario;”. 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, unlimited exposure residential usage scenario.
7. **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.
8. **Page 2-1, Page 2.2.2:** In the first sentence of this section, define the type of “sludge waste” disposed of at Site 12, such as “AVGAS tank bottom sludge.”.

9. **Page 2-3, Section 2.2.2:** In the first paragraph on this page, please describe the hazardous waste disposal practices for which the facility was cited by FDER in 1984. When did disposal resume? What types of hazardous wastes were placed in the landfill? Disposal of hazardous waste into a landfill after November 1980 triggers the requirement to obtain a permit. Because the facility does not have a RCRA permit, it is assumed the facility clean closed the landfill. In that case, it is unclear why Site 12 was added as a unit needing investigation under CERCLA. Please revise the text to address these comments. In the third sentence of the second paragraph, change “values for” to “concentrations of”. In the third paragraph, move the first sentence to the “History Section” and state the current land use at the site.
10. **Page 2-4, Table 2-1:** Remove the bold print from this table.
11. **Page 2-5, Section 2.5.1:** This section does not provide any information relevant to the nature and extent of contamination at Site 12 as its title implies. Include information about the type of contamination found and the concentrations. See page 6-18 in the ROD guidance for an example format in which to present this data. Delete the first sentence in the third paragraph. Recommendations for remedial action are not made in the FS or the FS addendum.
12. **Page 2-6, Section 2.5.1.1:** In the last sentence of the first paragraph, delete the words “and subsurface” since the topic of this section is surface soils.
13. **Page 2-6, Section 2.5.2:** In the second sentence, change “Most” to “More”.
14. **Page 2-6, Section 2.5.3:** This section should provide additional clarification as to why leaching to groundwater is a potential concern when constituents detected in surface and subsurface soils pose no risks to human health or the environment.
15. **Page 2-7, Section 2.6:** In the second sentence of the first paragraph, change the word “an” to “a”. Identify current and potential future site and resource uses in this section. Include more detailed information about the risk assessment. See pages 6-21 - 6-25 of the ROD guidance for example language and example formats in which to present this information.
16. **Page 2-7, Section 2.6.1:** Change “an” to “a” in the first sentence. Add “under a residential land use scenario” after “Site 12” in the last sentence of this section.
17. **Page 2-8, Section 2.6.3:** Delete the word “potential”. Identify land use assumed when stating that there are no unacceptable risks.
18. The ROD should include a section for “Documentation of Significant Changes” at the end of the Decision Summary section as per the ROD Guidance.