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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 29 RECORD OF
DECISION NAS WHITING FIELD FL
8/23/2005
U S EPA REGION IV



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

August 23, 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, Surface and Subsurface Soils at Site 29, Auto Hobby Shop, Rev. 0, June 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
Surface and Subsurface Soils at
Site 29, Auto Hobby Shop
Rev. 0
NAS Whiting Field, Milton, FL
June 2005**

1. **Page 1-1, Section 1.2:** The first two sentences of this section should be revised as follows: “This decision document presents the selected remedy for Site 29 as No Further Action (NFA) for surface and subsurface soils. As a result of the selected remedy, no action is required under a residential land use scenario; and unrestricted use and unlimited exposure of surface and subsurface soils will be allowed at Site 29”.
2. **Page 1-1, Section 1.3:** Revise the second sentence in the first paragraph as follows: “One constituent of potential concern (COPC), chromium, was identified in the RI and the associated risk assessments; however, no human health risks were identified for exposure to surface and subsurface soils at Site 29”. Identify land use assumed when concluding that no human health risks were identified. In the first sentence of the second paragraph, delete the word “potential”.
3. **Page 1-2, Figure 1-1:** The two figures combined into Figure 1-1 should be separated and enlarged to enhance readability.
4. **Page 1-3, Section 1.4:** Qualify the No Further Action conclusion in first paragraph by indicating assumed land use. In the fifth sentence of the second paragraph, insert “unlimited exposure” in between “use” and “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 unlimited exposure, unrestricted use scenario. See p. 8-5 of the ROD guidance for example outline for a No Further Action ROD.
6. **Page 2-3, Section 2.2.2:** In the first sentence of the third paragraph, change “Region IV RAGS” to “Region IX PRGs”. Include a citation for the Florida Soil Cleanup Target Level and the Region 9 screening numbers. Indicate land use associated with these screening numbers. State whether these numbers are used as screening levels to determine the need for further investigation. Spell out acronyms for DE 1 SCTL and PRG.
7. **Page 2-6, Section 2.5.1.1:** The last sentence of the first paragraph should state that although one COPC, chromium, was identified in the RI, no COCs were identified in the human health or ecological risk assessments. A discussion of site related risks should be reserved for Section 2.6 – Summary of Site Risks. Please note the FS is not the appropriate place for site related risks to be identified. Site related risks are identified and discussed in the RI and the associated risk assessments.
8. **Page 2-6, Section 2.5.1.2:** The text in this section states that no subsurface soil samples were collected for analysis. However, the text previously states in Section 2.2.2 that subsurface soil samples were collected and analyzed during the underground storage tank removals. This section should be revised to address this discrepancy and the analytical findings from these samples.

9. **Page 2-6, Section 2.5.3:** The text states that leaching from soils to groundwater is a potential concern; however, it was previously stated that no COCs were identified for surface and subsurface soils at Site 29. If leaching is indeed a potential concern without the identification of COCs in surface and subsurface soils, additional discussion is needed as to why this would be the case.
10. **Page 2-7, Section 2.6.1 and Section 2.6.2:** Definitive statements need to be made in these sections about the fact that no COCs were identified in the human health and ecological risk assessments for surface and subsurface soils at Site 29. In addition, identify the land use assumed when stating that no human health risks were identified.
11. **Page 2-7, Section 2.6.3:** Delete the word “potential” in this section. Identify land use assumed when stating that no human health risks were identified.
12. The ROD should include a section for “Documentation of Significant Changes” at the end of the Decision Summary section as per the ROD Guidance.
13. **Page R-1, References:** Please state the subject of the April 30, 2004, letter from James Cason to Linda Martin, listed as the third reference.