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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 14 FEASIBILITY STUDY  
ADDENDUM NAS WHITING FIELD FL  
3/20/2006  
U S EPA REGION IV



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

March 20, 2006

4WD-FFB

Commanding Officer  
Attn: Sarah Reed  
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. Reed:

The United States Environmental Protection Agency (EPA) has received (electronically) and reviewed the following document:

- **Feasibility Study Addendum for Site 14, Short-Term Sanitary Landfill Surface and Subsurface Soil at Naval Air Station Whiting Field, May 2005.**  
(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  
Site 14 Feasibility Study Addendum  
NAS Whiting Field  
Dated, May 2005**

1. In general, this document focuses too heavily on restating the findings of the risk assessment reassessment which are already presented in the "*Risk Assessment Re-evaluation of Soils at Sites 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18 NAS Whiting Field, dated October 2004*". The feasibility study addendum should present any changes to the feasibility study (FS) related to the types of remedial alternatives, the costs associated with those remedial alternatives, changes in remedial goal options, or the volumes of media to be addressed as a result of changes to the list of COCs. The document should be revised extensively to focus less on the risk assessment and more on how the FS related information changed from the time it was originally presented.
2. **Acronyms, Page v:** The definition of "COC" should be "constituents of concern", and the definition of "COPC" should be "constituents of potential concern".
3. **Section 1.0, Page 1-1:** The first sentence of the first bulleted item should be revised as follows: "Arsenic, originally identified as a constituent of concern (COC) at Site 14, was determined to be naturally occurring at the site, based on additional review of inorganic data from the facility and surrounding area in April 2001. In addition, it cannot be stated with certainty in the third bulleted item that the inorganic constituents, aluminum, iron, manganese, and vanadium, have no direct evidence of site related use at Site 14 since the site was reportedly used as a sanitary landfill involving the disposal of solvents and paint stripping residue. In the last sentence of the third bulleted item, change the word "chemicals" to "constituents".
4. **Section 1.1, Page 1-2:** As stated previously, the revised human health risk assessment was presented in the Risk Assessment Re-evaluation Report and should not be presented here. This document should address changes to the feasibility study based on the revised list of COCs.
5. **Section 2.1, Page 2-3:** In the last paragraph of this section, the text states that Sections 1.3 and 2.0 of the FS presents the nature and extent of contamination at Site 14. Please verify this statement. Normally, the nature and extent of contamination are presented in the remedial investigation (RI) report and not in the FS.
6. **Section 3.2, Page 3-1:** This section of the feasibility study addendum should be removed. Recommendations for remedial action are not to be presented in a feasibility study or feasibility study addendum. The proposed plan serves the purpose of presenting recommendations for remedial actions.
7. **Table 3-1, Page 3-4:** This table only provides a cost estimate for land use controls; however, it is unclear whether the cost estimates for the other alternatives evaluated in the FS have changed. If the other cost estimates have changes, those revised present worth costs should also be included.
8. **References, Page R-1:** Please state the subject of the letter from James Cason to James Holland for the third listed reference.