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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 35 FEASIBILITY STUDY ADDENDUM NAS WHITING FIELD FL
7/24/2006
U S EPA REGION IV

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

July 24, 2006

4WD-FFB

Commanding Officer
Attn: Ms. Sarah Reed
Naval Facilities Engineering Command Southeast
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 for OU22, Site 35, Building 1429, Public Works Maintenance Facility, Surface and Subsurface Soil at Naval Air Station Whiting Field, Rev. 0, June 28, 2006.** (Tetra Tech NUS, Inc.)

Enclosed are EPA's review comments. If you should have any questions, please contact me at (404) 562-8555.

Sincerely,

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP

EPA Review Comments
Site 35 Feasibility Study
Surface and Subsurface Soils
NAS Whiting Field
Dated, June 28, 2006

1) **Foreword, Page ix:** Add the following sentence to the end of the second paragraph: "Hereafter, CERCLA, as amended by SARA, shall be referred to as CERCLA."
2) **Executive Summary, Page ES-2:** In the seventh sentence of the first paragraph on this page, please correct the trademark symbol following "HNU".
3) **Section 1.1, Page 1-5:** Please revise the third sentence of the first paragraph on this page as follows: "Following receipt of all public comments, responses to these comments will be developed in a responsiveness summary within the ROD."
4) **Section 1.3, Page 1-6:** The last sentence of the first paragraph states that Figure 1-1 presents the locations of RI/FS sites at NAS Whiting Field; however, this figure is incomplete in that it only shows the locations of 5 RI/FS sites at the installation. In the seventh sentence of the second paragraph, add the word "The" before the words "Blackwater River".
5) **Section 1.4, Page 1-7:** Please revise the third sentence of the second paragraph as follows: "Consequently, the RI/FS process for NAS Whiting Field must follow the requirements of CERCLA, the NCP, and the "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (USEPA, October 1988)."
6) **Figure 1-1, Page 1-8:** This figure is labeled as the "Site Location Map, Feasibility Study"; however, the intent of this figure is unclear since the figure shows 5 sites at NAS Whiting Field. Only Site 35 is the subject of this feasibility study. Please clarify.
7) **Section 2.0, Page 2-1:** In the seventh sentence of the third paragraph, please correct the trademark symbol following "HNU".
8) **Section 2.1.1, Page 2-2:** In the second sentence of the subsurface soil subsection, the term "geologist's discretionary judgment" is used. This term is too vague and requires clarification.
9) **Section 2.1.2.2, Page 2-5:** This section should address the level of risk posed by benzo(a)pyrene in subsurface soils.
10) **Section 2.2.2, Page 2-8:** The third sentence of the first paragraph in this section states that RAOs are identified for surface soil; however, it was previously stated that there was no risk associated with surface soils at this site. Please revise. In addition, this section should state that RAOs for groundwater will be addressed in the Site 40 feasibility study.
11) **Section 2.2.2, Page 2-10:** The two RAOs presented in this section are too general and should be revised to be site specific.
12) **Section 2.2.3, Page 2-10:** The third sentence of the second paragraph should be revised as follows: "The evaluation for groundwater beneath Site 35 will be performed in the FS for Site 40, Basewide Groundwater."
13) **Section 2.2.4, Page 2-11:** Delete this section. The methodology described in this section is not correct for determining COCs. COCs are determined through the risk assessment process conducted during the remedial investigation.

14) **Section 2.3, Page 2-11:** Spell out the definition for "GRA" as this is the first occurrence of the abbreviation in the document. In the second sentence of this section, change "SARA" to "CERCLA".

15) **Section 2.3.3, Page 2-14:** This section of the feasibility study should contain a detailed description of each alternative to be evaluated. (i.e. Alternatives S35-1, S35-2 and S35-3) Each of the three paragraphs related to the alternatives is too vague and should contain more specific information related to each alternative. In addition, the description of the No Action alternative should indicate that the alternative does not involve the implementation of any remedial technologies. The paragraph related to the limited action alternative should provide a detailed description of the land use controls. Additionally, engineering controls should be added as a component of Alternative S35-2 along with land use controls to ensure that the concrete cover remains and is maintained. Alternatives S35-2 and S35-3 should also include the need for 5 year reviews in their descriptions.

16) **Section 2.3.4, Page 2-16:** The description of Alternative S35-2 in the second paragraph is too vague. In addition, engineering controls should be included as a component of this alternative to ensure the concrete cover remains in place and is maintained. The third sentence of this paragraph states that access to the site is to be restricted and that LUCs will ensure appropriate future land use; however, given the fact the contaminated soils lie beneath a concrete cover, it is unclear why site access must be restricted. Please provide clarification. As stated previously in the comments for this document, Alternatives S35-2 and S35-3 should also list the need for 5 year reviews in the descriptions of the alternatives.

17) **Section 2.4.1, Page 2-17:** This section of the FS, in which the three alternatives are listed by alternative number and then described, should occur earlier in the document. For example, in Section 2.3.4 on page 2-16, the alternative numbers are used in the text; however, the alternatives along with their respective numbers are not formally introduced until Section 2.4.1.

18) **Section 2.4.1.1.2, Page 2-18:** The Balancing Criteria related to "Reduction of Mobility, Toxicity, or Volume through Treatment" for Alternative S35-1 states that there would be no risk posed to human health and the environment because Alternative S35-1 involves no action. This statement is not correct. Because Alternative S35-1 involves no action, risk would remain to human health and the environment from benzo(a)pyrene as identified in the risk assessment.

19) **Section 2.4.1.2.2, Page 2-21:** In the description of "Implementability", the text states that soil sampling would be required prior to implementing LUCs. This statement should be verified as it establishes an expectation that additional soil delineation will be conducted at Site 35. Delete the words "total project" in the description of cost for Alternative S35-2.

20) **Section 2.4.1.3.2, Page 2-23:** Delete the words "total project" in the description of cost for Alternative S35-3.

21) **Section 2.5.3, Page 2-24:** The text states that Alternative S35-2 would meet PRGs. It is unclear how LUCs will assist in meeting the PRGs for benzo(a)pyrene when no active treatment is involved. Please provide clarification or modify the statement.

22) **Section 2.5.4, Page 2-29:** The text states that Alternatives S35-1 and S35-2 would not reduce the mobility of chemical constituents for Site 35; however, as stated previously in the review comments for this document, if engineering controls are added to Alternative S35-2, mobility may be reduced.
23) **Section 2.5.5, Page 2-30:** The text states that Alternative S35-2 is estimated to reach objectives in 30 years; however, it is unclear how such an estimate was derived. A reference should be provided.
24) **Section 2.5.7, Page 2-31:** Delete the words "total project" in the second and third paragraphs of this section.