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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 13 DRAFT RECORD OF  
DECISION NAS WHITING FIELD FL  
8/23/2006  
U S EPA REGION IV



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

August 23, 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:

- **Record of Decision for OU 12, Site 13, Sanitary Landfill, Surface and Subsurface Soils, Rev. 1, July 2006, 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 13, Sanitary Landfill  
Rev. 1  
NAS Whiting Field, Milton, FL  
July 2006**

1. **Acronyms, Page vi:** The definition of “NPW” should be “net present worth”.
2. **Section 1.1, Page 1-1:** Change “Site 13” to “OU 12 – Site 13” at the beginning of the second sentence.
3. **Section 1.2, Page 1-1:** Change “Site 13” to “OU 12 – Site 13” in the first sentence of this section. Please add the following after the second sentence: “There is no surface water or sediment present at Site 13.”
4. **Section 1.3, Page 1-3:** Delete “...for exposure to surface and subsurface soils at Site 13.” Please change the first sentence of the last paragraph in this section to the following in order to make a more definitive statement: “No unacceptable ecological risks were identified in the ERA which is presented in the RI; and further ecological study is unwarranted because Site 13 is limited in the quantity and quality of habitat.”
5. **Section 1.4, Page 1-3:** Please state that no surface water or sediment is present at Site 13 at the end of the second paragraph.
6. **Section 1.4, Page 1-4:** Please add the word “maintaining” between “implementing” and “reporting on” in the last sentence of the seventh paragraph.
7. **Section 1.7, Page 1-5:** Please change the EPA authorizing signature information to the following: Beverly H. Banister, Acting Director, Waste Management Division, U.S. EPA Region 4.
8. **Section 2.3, Page 2-5:** Please correct the dates highlighted in yellow in the second and third paragraphs.
9. **Section 2.4, Page 2-5:** Make “OU” plural in the second sentence. In the fourth sentence, add “only” between “addresses” and “surface”. Add the following to the end of the paragraph: “As stated earlier, there is no surface water or sediment present at Site 13.”
10. **Section 2.5.1, Page 2-6:** Move the first sentence of the third paragraph to the second sentence and revise as follows: “Based on a hypothetical residential land use scenario, the revised HHRA identified five COCs in surface soil.”
11. **Section 2.5.1, Page 2-7:** Change “Site 18” to “Site 13” at the top of the page.
12. **Section 2.6.1, Page 2-8:** Add the word “hypothetical” between “a” and “residential” in the last sentence of this section.
13. **Section 2.6.1.1, Page 2-9:** Change the word “selected” to “screened” in the first sentence at the top of the page. Change the third sentence of the third paragraph as follows: “However, arsenic was not retained as a COC for industrial exposures to subsurface soil at Site 13 since the levels detected were determined to be naturally occurring.”

14. **Section 2.6.3, Page 2-9 and 2-10:** Change the second sentence of this section as follows: “Since mercury levels exceeded the FDEP residential SCTLs, the resulting HI is greater than 1.0 indicating an unacceptable non-carcinogenic risk.” The third paragraph of this section should be rewritten for clarity and also to incorporate the fact that the risk assessment was conducted according to both EPA and FDEP guidelines and methodologies. The third paragraph should end by stating that no COCs were identified which exceeded EPA risk based standards; however, one COC, mercury, was found to exceed a FDEP residential SCTL developed specifically for this risk assessment as allowed in FDEP guidelines.
15. **Section 2.7, Page 2-10:** The remedial action objectives (RAOs) presented in this section should be revised to be more site specific. As written the RAOs are too general.
16. **Section 2.8, Page 2-11:** Change the word “require” to “required” in the first sentence. In the second paragraph, the second sentence should be revised as follows: “..., as discussed previously, no unacceptable ecological risk was identified.”
17. **Table 2-2, Page 2-12:** Alternatives 2, 3 and 4 should each include a 5-year review requirement.
18. **Section 2.8, Page 2-13:** In the description of Alternative 2, change the second occurrence of “prohibit” to “restrict” and change the word “for” to “to”. Please remove the extra spacing in the first sentence. In the description of Alternative 3, it should be explained why LUCs would still be necessary after a limited soil removal to address levels exceeding those allowed for residential sites. Change “as described above” to “as described in Alternative 2 above.” In the description of Alternative 4, change “as described above” to “as described in Alternative 2 above.”
19. **Section 2.10.2, Page 2-17:** In the first sentence of this section, change “unrestricted reuse” to “unrestricted use and unlimited exposure”. The second sentence is a run on sentence and should be revised. The first bulleted item in the “LUC performance objectives” is too general and should be revised to be more site specific. The first bulleted item in “The LUCs will:” should include examples of approved activities allowed onsite. For example, are schools, daycares, or parks allowable? A digging prohibition should also be included in the LUCs. In the third sentence of the second full paragraph, change “reuse” to “use”. In the fourth sentence of the second paragraph, add the word “maintaining” after the word “implementing”.
20. **Section 2.10.2, Page 2-19:** In the second to the last sentence of this section, change “an RD” to “a RD”.
21. **Table 2-5, Page 2-20:** The description of operation and maintenance costs should include the requirement to conduct 5-year reviews.
22. **Responsiveness Summary:** Please change the dates highlighted in yellow.