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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 35 DRAFT RECORD OF
DECISION NAS WHITING FIELD FL
8/24/2006
U S EPA REGION IV



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

August 24, 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 22, Site 35, Building 1429, Public Works Maintenance Facility, Surface and Subsurface Soils, Rev. 0, 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 35, Building 1429,
Public Works Maintenance Facility
Rev. 0
NAS Whiting Field, Milton, FL
July 2006**

1. **Section 1.1, Page 1-1:** Change “town” to “city” in the first sentence of this section. Change “Site 35” to “OU 22 – Site 35” at the beginning of the second sentence.
2. **Section 1.2, Page 1-1:** Revise the first sentence of the section as follows: “This decision document presents the selected remedy for OU 22 – Site 35 as Engineering Controls (ECs) and Land Use Controls (LUCs) for surface and subsurface soils.” Please add the following after the second sentence: “There is no surface water or sediment present at Site 35.”
3. **Section 1.3, Page 1-1:** Please identify the land use assumed when identifying constituents of concern.
Figure 1-1, Page 1-2: Provide a legend for the map depicting the buildings and Site 35. Indicate the location of the abandoned underground storage tanks. Indicate the location of former Building 2848.
4. **Section 1.3, Page 1-3:** Please revise the first sentence at the top of the page as follows: “The ecological risk assessment (ERA) presented in the RI did not identify any unacceptable ecological risks at Site 35; therefore, further ecological study is unwarranted because the site is limited in the quantity and quality of habitat.” In the third sentence of the second paragraph on this page, delete “the potential”.
Section 1.4, Page 1-3: Please state that no surface water or sediment is present at Site 35 at the end of the second paragraph. The first sentence of the third paragraph should be rewritten as follows: “The selected remedy for Site 35 is ECs and LUCs for surface and subsurface soils.” Add the following between the first and second sentences: “ECs will consist of the existing concrete/asphalt cover.” In the fourth sentence of the third paragraph, add “ECs and” between “of” and “LUCs”. In the first bulleted item, is residential development the only prohibited use of Site 35 or are there other uses prohibited under the LUCs? Any prohibited uses should be listed here. In the second bulleted item, change “LUCs” to “ECs”. It is unclear whether surface soils pose a risk. The last paragraph of this section suggests that surface soils do pose a risk. Please clarify. If surface soils do not pose a risk, explain why the concrete pad will be maintained as part of the ECs/LUCs. Indicate whether the contamination at the site constitutes principal threat wastes.
5. **Section 1.4, Page 1-4:** The third sentence of the third paragraph on this page states that warning signs will be posted at the site to discourage trespassing. However, it is unclear why trespassing would need to be discouraged if the site is covered by concrete/asphalt. In the fourth sentence of the third paragraph, delete “and groundwater”. The last sentence of the third paragraph should be revised as follows: “The Navy will be responsible for implementing, maintaining, reporting on, and enforcing the LUCs and for making sure the ECs remain in place.” In the first sentence of the fourth paragraph, add

- “the” between “estimates” and “present”. In the second sentence of the fourth paragraph, delete “surface and”.
6. **Section 1.5, Page 1-4:** Add “EC” between “The” and “LUC” in the first sentence of this section.
 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. The authorizing signature page should be a separate page.
 8. **Section 2.2.2, Page 2-3:** The second sentence of the second paragraph on this page includes the term “geologist’s discretionary judgment”. This term requires either further clarification or deletion from the sentence. In the third sentence of the fourth paragraph, add “arsenic” after the word “aluminum”. Here and throughout, identify the land use associated with the clean up target levels used for screening. Spell out the acronym for DE1, where it can be located in the Florida regulations, and indicate the land use associated with that number.
 9. **Table 2-1, Page 2-4:** The third row of this table lists “2005” as the date for the Proposed Plan. This date should be changed to “2006”.
 10. **Section 2.4, Page 2-4:** Please change “LUCs” to “ECs/LUCs” in the first sentence.
 11. **Section 2.5.1.2, Page 2-6:** Add “Following the risk assessment,” to the beginning of the fourth sentence of the first paragraph. Identify the land use associated with the cleanup goals.
 12. **Section 2.5.3, Page 2-6:** Indicate the depth of the contamination and the water table depth.
 13. **Section 2.5.3, Page 2-7:** The first paragraph on this page suggests humans and ecological receptors are effective at moving soil, and then goes on to only discuss human activity. This paragraph should also address the effect of ecological receptors. Please add the following to the end of the second sentence of the second paragraph: “..., and due to the entire site being covered by concrete/asphalt.”
 14. **Section 2.5.4, Page 2-7:** This paragraph should state any other uses which are allowable or prohibited.
 15. **Section 2.6.1.1, Page 2-7:** Please provide more information about how the risk assessment was conducted, the meaning of the risk numbers, etc. Sample text, including data summary formats, can be found in Section 11 of the ROD guidance beginning at page 6-18.
 16. **Section 2.6.1.1.1, Page 2-8:** The text in Section 2.5.3 suggests that benzo(a)pyrene is the only constituent of concern. However, Section 2.6.1.1 states that cPAHs are the primary risk driver. Please clarify this apparent inconsistency. List all constituents of concern using the format found in the Highlight 6-15 in the ROD guidance. The first sentence of the discussion of “Noncarcinogenic Risks” does not identify which chemical constituent the HI relates to. Please clarify.
 17. **Section 2.6.1.1.1, Page 2-9:** It is unclear what is intended by the first full paragraph on this page. It appears that the information in this paragraph is not related to the discussion of Site 35 since the text refers to vanadium in surface soil and the term “No Further Action” is used. Please clarify.
 18. **Section 2.6.2, 2-9:** Describe the Step 3A analysis. Provide a citation for the “conservative screening levels” used.

19. **Section 2.6.3, Page 2-10:** Again the first paragraph of this section does not appear to pertain to Site 35. More detail related to the risk posed by benzo(a)pyrene is necessary in this section. For example, what level of risk is posed by benzo(a)pyrene and how does this level of risk compare to established health-based benchmarks.
20. The ROD must include a description of the alternatives considered and then contrast those remedies using the nine criteria specified in the NCP. See Section 6.3.9 of the ROD guidance.
21. Provide a section identifying the remedial action objectives. See Section 6.3.8. of the ROD guidance.
22. **Section 2.7.1, Page 2-10:** Change “LUCs” to “ECs/LUCs” in the first paragraph. The first sentence of the second bulleted item should be revised as follows: “No unacceptable ecological risks were identified.”
23. **Section 2.7.2, Page 2-11:** In the first sentence of the first paragraph, change the word “reuse” to “use” and add “and unlimited exposure;”. Also, change “LUCs” to “ECs/LUCs”. The last sentence of the first paragraph should be revised as follows: “The ECs/LUCs apply only to surface and subsurface soils.” Throughout the rest of this section, change “LUCs” to “ECs/LUCs”. The first bulleted item in the “LUC performance objectives” should be revised to be more site specific. As written, it is too general. The second bulleted item should list any other prohibited uses of the site such as daycares, schools, parks, etc. A third bullet should be added to address the need to maintain the existing concrete/asphalt cover. The bullet under the “LUC will:” should also list any additional activities allowable or restricted under the LUCs. In the third sentence of the second full paragraph, change “reuse” to “use”. In the fourth sentence, add “maintaining” after “implementing”.
24. **Table 2-2, Page 2-13:** Add a 5-year review requirement to the description of “Operation and Maintenance Costs”.
25. **Section 2.7.4, Page 2-14:** Revise the sentence in this section as follows: “Immediately upon implementation, Site 35 will be environmentally safe for its current and future intended non-residential/industrial uses, as long as the ECs/LUCs are in place and functioning.”
26. **Section 2.8, Page 2-14:** Change “LUCs” to “ECs/LUCs” in the third sentence. Also, add the following to the end of the third sentence: “...and by requiring the existing concrete/asphalt cover to remain in place.” The statutory determinations must address whether the remedy satisfies the preference for treatment. This section should also state whether five year reviews will be required at this site. Remedies which leave waste in place must include 5-year reviews, per CERCA Section 121(c). Please revise the ROD as necessary to address this comment. See page 6-53 of the ROD guidance.
27. **Table 2-3, Pages 2-15 and 2-16:** ARARS must be correlated with the remedy considered. A generic table of ARARS is not enough. Please revise the ROD to address this comment.