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NAS WHITING FIELD  
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FINAL RECORD OF DECISION FOR SITE 14 NAS WHITING FIELD FL  
9/22/2006  
TETRA TECH NUS

# Comprehensive Long-term Environmental Action Navy

CONTRACT NUMBER N62467-94-D-0888



Rev. 2  
09/22/06

## Record of Decision for OU 13, Site 14, Short-Term Sanitary Landfill Surface and Subsurface Soil

Naval Air Station Whiting Field  
Milton, Florida  
USEPA ID No. FL2170023244

Contract Task Order 0369

September 2006



Southeast

2155 Eagle Drive

North Charleston, South Carolina 29406

**RECORD OF DECISION  
FOR  
OPERABLE UNIT 13, SITE 14, SHORT-TERM SANITARY LANDFILL  
SURFACE AND SUBSURFACE SOIL**

**NAVAL AIR STATION WHITING FIELD  
MILTON, FLORIDA  
USEPA ID No. FL2170023244**

**COMPREHENSIVE LONG-TERM  
ENVIRONMENTAL ACTION NAVY (CLEAN) CONTRACT**

**Submitted to:  
Naval Facilities Engineering Command  
Southeast  
2155 Eagle Drive  
North Charleston, South Carolina 29406**

**Submitted by:  
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**CONTRACT NO. N62467-94-D-0888  
CONTRACT TASK ORDER 0369**

**SEPTEMBER 2006**

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### CERTIFICATION OF TECHNICAL DATA CONFORMITY

The Contractor, Tetra Tech NUS, Inc., hereby certifies, to the best of its knowledge and belief, the technical data delivered herewith under Contract No. N62467-94-D-0888 are complete, accurate, and comply with all requirements of this contract. The work and professional opinions rendered in this report were conducted or developed in accordance with commonly accepted procedures consistent with applicable standards of practice.

DATE: 30 September 2006

A handwritten signature in black ink, reading "Michael O. Jaynes". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

NAME AND TITLE OF CERTIFYING OFFICIAL: Michael O. Jaynes, P.E.  
Task Technical Lead

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## ACRONYMS

ARARs	Applicable or relevant and appropriate requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CG	Cleanup Goals
COC	Constituent of Concern
COPC	Constituent of Potential Concern
ERA	Ecological Risk Assessment
EE	Envirodyne Engineers, Inc.
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FS	Feasibility Study
FSA	Feasibility Study Addendum
ft	feet/foot
G&M	Geraghty & Miller, Inc.
HHRA	Human Health Risk Assessment
HLA	Harding Lawson and Associates
IAS	Initial Assessment Study
IR	Installation Restoration
LUCs	Land Use Controls
NA	No Action
NACIP	Navy Assessment and Control of Installation Pollutants
NAS	Naval Air Station
Navy	United States Navy
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
OU	Operable Unit
RA	Remedial Action
RAOs	Remedial Action Objectives
RD	Remedial Design
RI	Remedial Investigation
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
SERA	Screening Ecological Risk Assessment
SVOCs	Semi Volatile Organic Compounds
TBC	To Be Considered
TtNUS	Tetra Tech, NUS, Inc.
USEPA	United States Environmental Protection Agency
VOCs	Volatile Organic Compounds

## **1.0 DECLARATION OF THE RECORD OF DECISION**

### **1.1 SITE NAME AND LOCATION**

Naval Air Station (NAS) Whiting Field is located approximately 5.5 miles north of the town of Milton, Florida in Santa Rosa County, about 25 miles northeast of Pensacola. Operable Unit (OU) 13, Site 14, Short-Term Sanitary Landfill, hereafter referred to as "Site 14", is located in the southeastern section of the facility near the South Air Field, at NAS Whiting Field. The approximate location of Site 14 is shown on Figure 1-1.

### **1.2 STATEMENT OF BASIS AND PURPOSE**

This decision document presents the selected remedy for OU 13, Site 14 as No Action (NA) for surface and subsurface soils. Groundwater at NAS Whiting Field has been identified as a separate site (Site 40, Basewide Groundwater) and will be addressed in a future decision document. The selected action was chosen by the United States Navy (Navy) and the United States Environmental Protection Agency (USEPA) in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Information supporting the selection of this action is contained in the Administrative Record for this site. The NAS Whiting Field Information Repository, including the Administrative Record, is located at the West Florida Regional Library, Milton Branch, 805 Alabama Street, Milton, Florida 32570, (850) 623-5565.

The Florida Department of Environmental Protection (FDEP) concurs with the selected remedy.

### **1.3 ASSESSMENT OF THE SITE**

The Remedial Investigation (RI) Report for Site 14 [Harding Lawson and Associates (HLA), 1999] identified two volatile organic compounds (VOCs), two semi-volatile organic compounds (SVOCs), and 19 inorganic compounds in surface soil and four VOCs, three SVOCs, and 19 inorganic compounds in subsurface soil at Site 14. No constituents of potential concern (COPC) were identified in surface or subsurface soil in the RI and no human health risks were identified for exposure to surface and subsurface soils at Site 14.

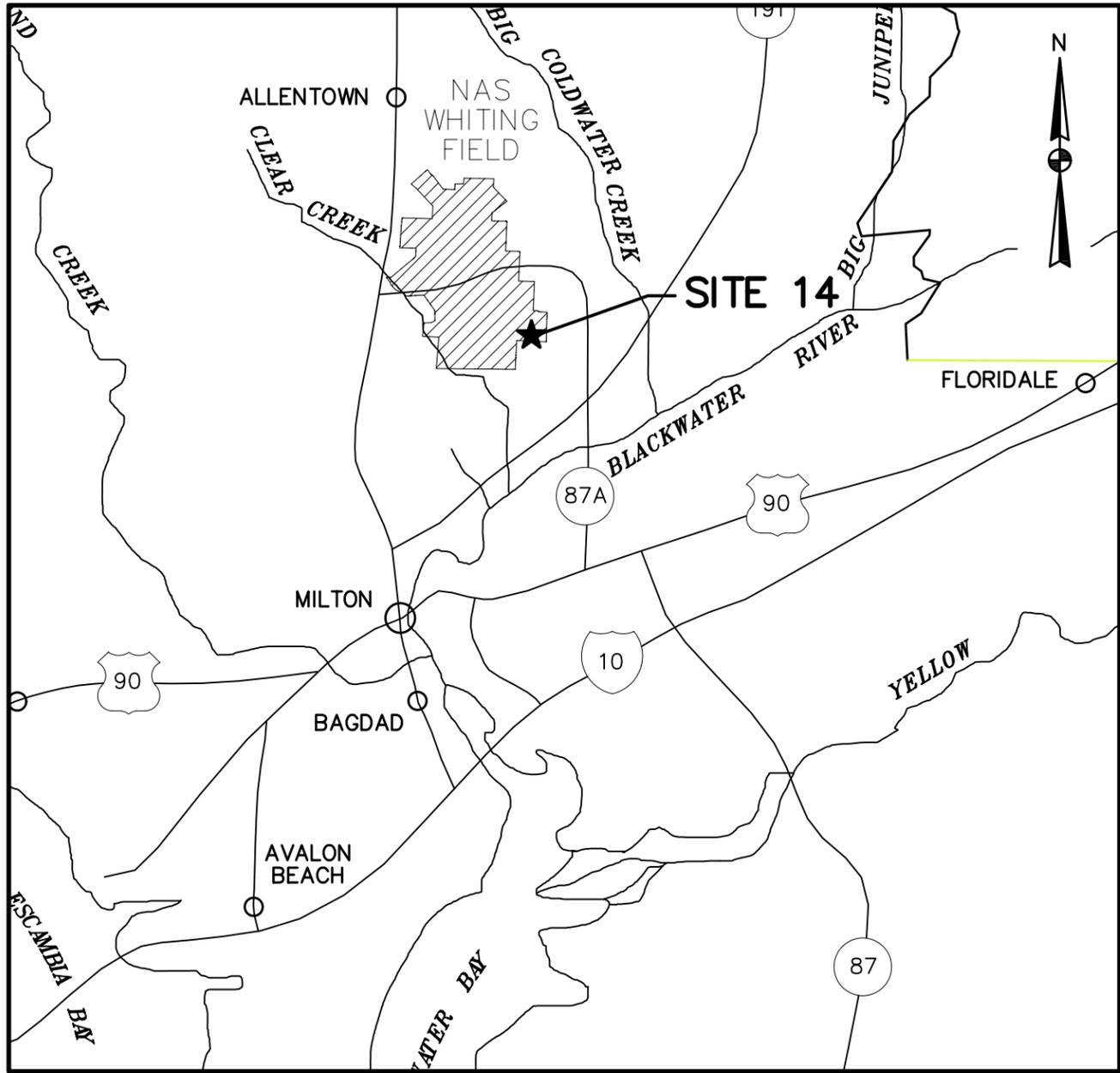
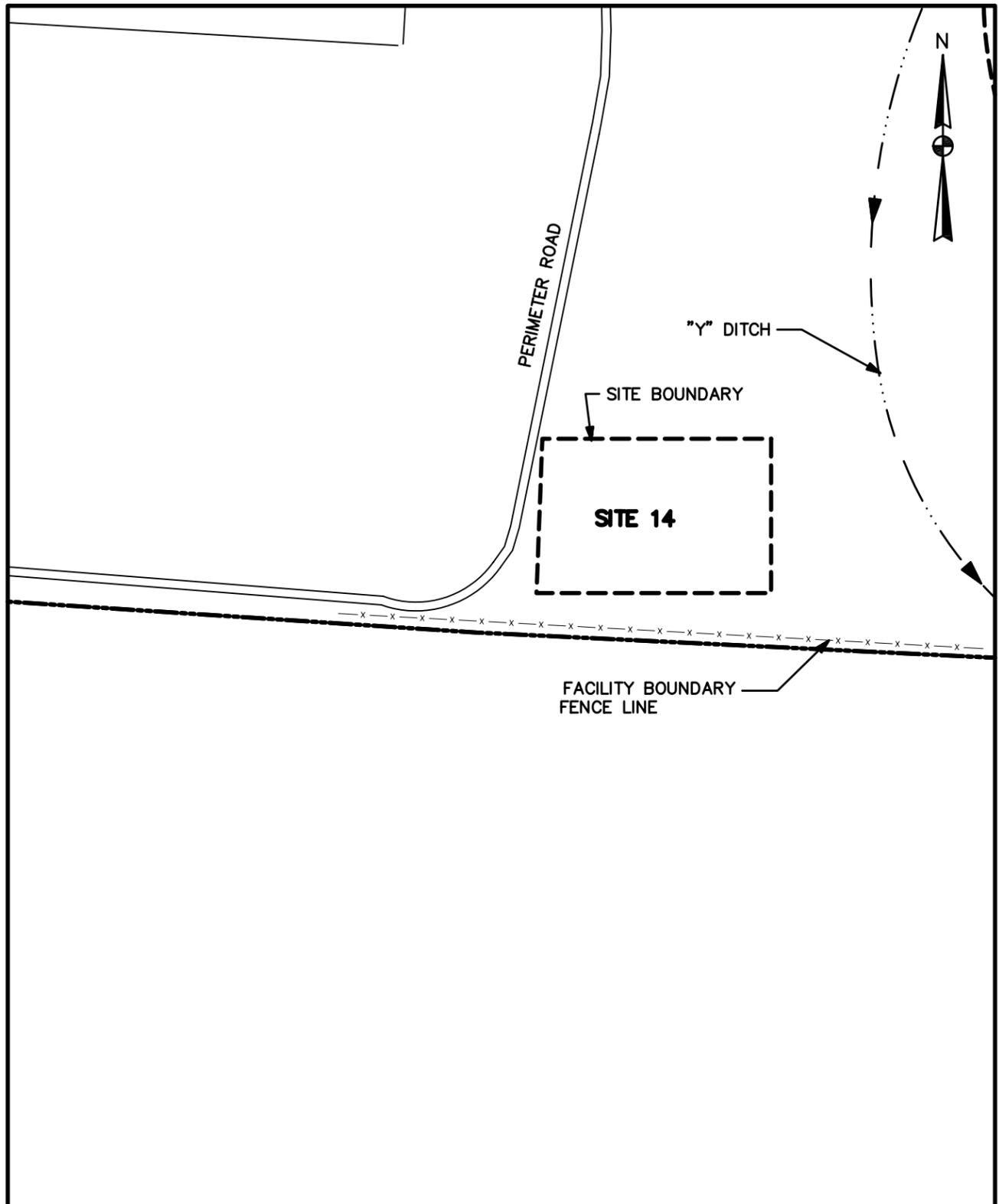


FIGURE 1-1  
 SITE 14 LOCATION AND AREA MAP  
 RECORD OF DECISION  
 NAS WHITING FIELD, MILTON, FLORIDA



A risk assessment was completed for Site 14 to predict whether the site would pose current or future threats to human health or the environment. Both a human health risk assessment (HHRA) and an ecological risk assessment (ERA) were performed for Site 14. These risk assessments evaluated the constituents detected in site soil during the RI. The results of the ERA presented in the RI indicate ecological risks at the site are acceptable, and further ecological study is unwarranted because the site is limited in the quantity and quality of habitat.

Site 14 poses no risk to human health and the environment under a residential land use scenario. A summary of site risks is provided in Section 2.6 of this Record of Decision (ROD).

Site 14 currently consists of vacant, unused land with a native grass and scrub oak vegetative cover interspersed between planted pine trees and some exposed soil in the central area. No permanent surface water sources exist in the immediate vicinity of Site 14.

#### **1.4 DESCRIPTION OF THE SELECTED REMEDY**

This ROD presents the final action for surface and subsurface soils at Site 14 and is based on results of the RI (HLA, 1999), the Feasibility Study (FS) (HLA, 2001), the revised human health risk assessment (HHRA) included in the *Risk Assessment Re-Evaluation Report of Soils, Sites 9, 10, 11, 12, 13, 14, 15, 16, 17, and 18* report [Tetra Tech NUS, Inc. (TtNUS), 2006c] and the Feasibility Study Addendum (FSA) (TtNUS, 2006a). This ROD only addresses surface and subsurface soil at Site 14.

This ROD does not address actual or potential groundwater contamination at the site. Groundwater at NAS Whiting Field has been identified as a separate site (Site 40, Basewide Groundwater) and will be addressed in a future decision document. There is no surface water or sediment at Site 14.

The selected remedy for Site 14 is NA for surface and subsurface soils and ensures protection of human health and the environment. Current soil conditions at Site 14 are protective of human health and the environment under an unrestricted, unlimited exposure scenario. No CERCLA action for surface and subsurface soils is necessary because the contaminants found do not pose a risk to human health and the environment based on an unrestricted use, unlimited exposure residential use scenario.

#### **1.5 STATUTORY DETERMINATIONS**

The NA remedy selected for surface and subsurface soils at Site 14 is protective of human health and the environment, complies with federal and state requirements legally applicable or relevant and appropriate,

and is cost effective. No remedial action (RA) is necessary to ensure protection of human health and the environment based on an unrestricted use/unlimited exposure scenario. Consequently, no active treatment or monitoring will be conducted at Site 14.

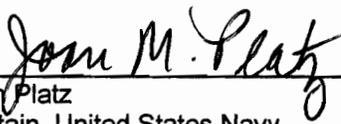
**1.6 DATA CERTIFICATION CHECKLIST**

The information required to be included in the ROD is summarized on Table 1-1. These data are presented in Section 2.0, Decision Summary, of this ROD. Additional information, if required, can be found in the NAS Whiting Field Administration Record for Site 14.

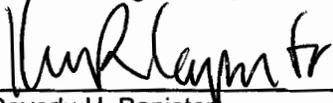
**TABLE 1-1**  
**DATA CERTIFICATION CHECKLIST**  
**SITE 14 – SHORT-TERM SANITARY LANDFILL**  
**RECORD OF DECISION**  
**NAVAL AIR STATION WHITING FIELD**  
**MILTON, FLORIDA**

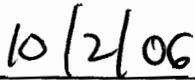
<b>Information</b>	<b>ROD Reference</b>
Constituents of Concern (COCs)	Not applicable
Baseline risk represented by the COCs	Not applicable
Disposition of source materials constituting principal threat.	Not applicable
Current and reasonably anticipated future land use scenarios used for risk assessment.	Section 2.5.4 Page 2-7
Potential land uses available at the site as a result of the selected remedy.	Section 2.10.4 Page 2-15
Estimated costs are projected for the selected remedy.	Not applicable
Key factors leading to the selection of the Remedy.	Section 2.10.1 Page 2-11

1.7 AUTHORIZING SIGNATURES

  
\_\_\_\_\_  
Joan Platz  
Captain, United States Navy  
Commanding Officer, NAS Whiting Field

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Beverly H. Banister  
Acting Director, Waste Management Division  
USEPA, Region 4

  
\_\_\_\_\_  
Date

## **2.0 DECISION SUMMARY**

### **2.1 SITE NAME, LOCATION, AND DESCRIPTION**

Site 14, Short-Term Sanitary Landfill, is approximately three acres in size and is located near the southeastern boundary of NAS Whiting Field and is one of six sites (Sites 9 through Site 14) comprising the area known as the Southeast Disposal Area. The site is square in shape and oriented north to south.

The approximate location of Site 14 is shown on Figure 2-1. There are currently no buildings at Site 14. No permanent surface water sources exist in the immediate vicinity of Site 14. However, surface drainage from Site 14 is toward an unlined, vegetated ditch designated the "Y" ditch located approximately 400 feet (ft) east of the site. The "Y" ditch drains east toward Big Coldwater Creek located 1.8 miles east of Site 14.

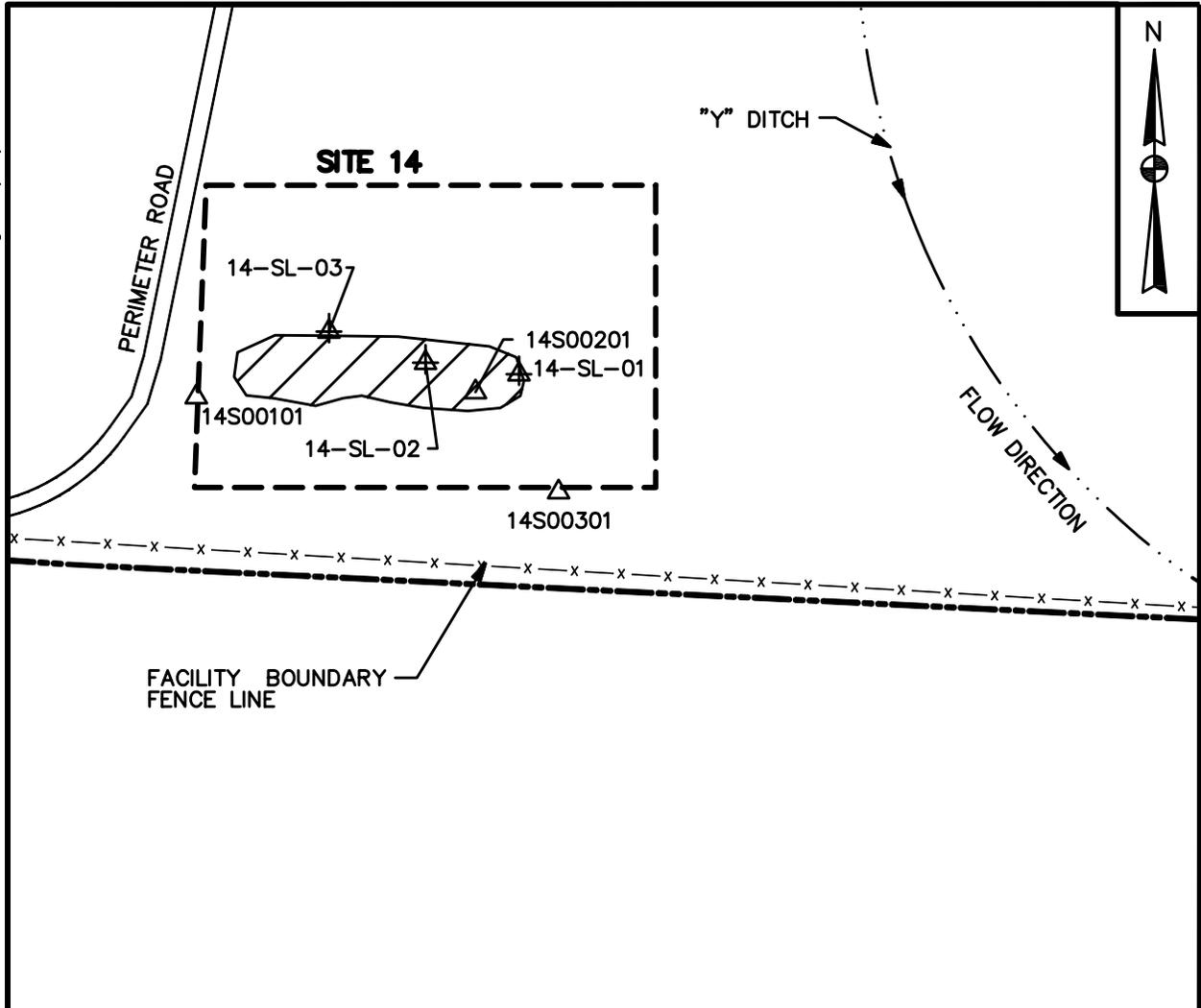
### **2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES**

#### **2.2.1 NAS Whiting Field History**

NAS Whiting Field was placed on the National Priorities List (NPL) by the USEPA in June 1994. Following the listing of NAS Whiting Field on the NPL, remedial response activities have been conducted pursuant to CERCLA authority. The decision documents and remedy selection for NAS Whiting Field are developed by the Navy, the lead agency, and the USEPA, a support agency, with concurrence from FDEP, a support agency.

The first environmental studies for the investigations of waste handling and/or disposal sites at NAS Whiting Field were conducted during the Initial Assessment Study (IAS) [Envirodyne Engineers, Inc. (EE), 1985]. The record search indicated throughout its years of operation, NAS Whiting Field generated a variety of wastes related to pilot training, operation and maintenance of aircraft and ground support equipment, and facility maintenance programs.

NAS Whiting Field presently consists of two airfields (North and South Fields) and serves as a naval aviation training facility providing support facilities for flight and academic training. The current and anticipated future land use at Site 14 is non-residential / recreational.



**LEGEND:**

- PHASE IIA SURFACE SOIL SAMPLE LOCATION AND DESIGNATION
- PHASE IIB SURFACE SOIL SAMPLE LOCATION AND DESIGNATION
- INTERPRETED LANDFILL AREA
- APPROXIMATE SITE BOUNDARY

0 200 400  
GRAPHIC SCALE IN FEET

**KEY:**  
NAS = NAVAL AIR STATION

DRAWN BY DM	DATE 3/17/05
CHECKED BY	DATE
REVISED BY	DATE
SCALE AS NOTED	



SITE 14 PLAN MAP  
SHORT-TERM  
SANITARY LANDFILL  
RECORD OF DECISION  
NAS WHITING FIELD  
MILTON, FLORIDA

CONTRACT NO. 0006	
OWNER NO. 0000	
APPROVED BY	DATE
DRAWING NO. FIGURE 2-1	REV. 0

### **2.2.2            Site 14 History**

Site 14 was the primary sanitary landfill at NAS Whiting Field for six to nine months during the latter part of 1978 and the early part of 1979. Landfilling operations ceased in this area in early 1979 because the high clay content of the soil resulted in the ponding of rainwater throughout the site. The disposal area was subsequently covered with soil, and pine trees were planted.

Past disposal of hazardous waste (described above) at Site 14, although acceptable at the time, had the potential to cause long-term problems through the release of hazardous constituents into the soil and groundwater. As part of the Installation Restoration (IR) Program and the Navy Assessment and Control of Installation Pollutants (NACIP), Site 14 was included in the *Initial Assessment Study, NAS Whiting Field, Milton, Florida*. (EE, 1985) and the *Verification Study* [Geraghty & Miller (G&M), 1986] for NAS Whiting Field.

### **2.2.3            Site Investigations**

Both organic compounds and inorganic analytes were identified at Site 14 during the RI and various additional investigations.

An FS (HLA, 2001) was conducted to identify the best approach to address soil contamination identified in the RI. The FS identified and evaluated three remedial alternatives.

An FSA (TtNUS, 2006a) was conducted to address the following activities undertaken and determinations made since the original FS was submitted:

Arsenic originally identified as a COPC was determined to be naturally occurring at Site 14. Based on additional review of inorganic data from the facility and area soil geology in April 2001, the observed arsenic values were determined to represent naturally occurring levels (FDEP, 2001). Because the identified human health risks associated with arsenic are now considered to be due to naturally occurring levels, arsenic has not been retained as a COPC, and remediation of arsenic in surface soil is not required for Site 14.

Table 2-1 summarizes the Site 14 investigative history.

**TABLE 2-1  
INVESTIGATIVE HISTORY  
RECORD OF DECISION  
SITE 14, SHORT-TERM SANITARY LANFILL  
NAVAL AIR STATION WHITING FIELD  
MILTON, FLORIDA**

<b>Date</b>	<b>Investigation Title</b>	<b>Activities</b>	<b>Findings</b>
1985	<i>Initial Assessment Study, NAS Whiting Field, Milton, Florida</i> (Envirodyne Engineers, Inc., 1985)	<ul style="list-style-type: none"> <li>Review of historical records and aerial photographs</li> <li>Field inspections and personal interviews</li> </ul>	<ul style="list-style-type: none"> <li>In 1978 and 1979, Site 14 received general refuse and waste along with unknown quantities of waste solvents, paint, oil, and hydraulic fluid.</li> <li>Site 14 was recommended for additional investigation due to the potential impact on human and ecological receptors.</li> </ul>
1986	<i>Verification Study, Assessment of Potential Groundwater Pollution at NAS Whiting Field, Florida</i> (Geraghty & Miller, Inc., 1986)	<ul style="list-style-type: none"> <li>Installation of one monitoring well and groundwater sampling</li> </ul>	<ul style="list-style-type: none"> <li>Low concentrations of lead and zinc were detected below Florida's primary drinking water standards.</li> </ul>
1990 - 1999	<i>Remedial Investigation Report, Site 14, NAS Whiting Field, Milton, Florida</i> , [Harding Lawson Associates (HLA), 1999]	<ul style="list-style-type: none"> <li>Geological assessment</li> <li>Hydrogeological assessment</li> <li>PCPT and BAT groundwater sampling</li> <li>Geophysical survey</li> <li>Collection and analysis of surface and subsurface soil samples</li> <li>Installation of groundwater monitoring wells and groundwater sampling</li> <li>Soil gas survey</li> <li>HHRA</li> <li>ERA</li> </ul>	<ul style="list-style-type: none"> <li>The groundwater flow direction is to the southeast across the site.</li> <li>The HHRA determined the carcinogenic risk from exposure to surface soil was within USEPA's acceptable risk range for current and future receptors at Site 14.</li> <li>The ERA does not predict unacceptable risks to ecological receptors from chemicals present in surface and subsurface soil at Site 14.</li> </ul>
2001	<i>Feasibility Study for Site 14, NAS Whiting Field, Milton, Florida</i> (HLA, 2001).	<ul style="list-style-type: none"> <li>Evaluated remedial alternatives for site cleanup of COCs.</li> </ul>	<ul style="list-style-type: none"> <li>Two COCs identified for surface soil.</li> </ul>
2006	<i>Risk Assessment Re-Evaluation of Soils at Sites 9, 10, 11, 12, 13, 14, 15, 16, 17, and 18, NAS Whiting Field, Milton, Florida</i> (TtNUS, 2006c)	<ul style="list-style-type: none"> <li>Evaluated changed conditions at the site and changes in regulatory screening criteria.</li> </ul>	<ul style="list-style-type: none"> <li>No surface or subsurface soil COCs identified.</li> </ul>
2006	<i>Feasibility Study Addendum for Site 14, Short-Term Sanitary Landfill, NAS Whiting Field, Milton, Florida</i> (TtNUS, 2006a).	<ul style="list-style-type: none"> <li>Evaluated remedial alternatives for site cleanup of COCs.</li> </ul>	<ul style="list-style-type: none"> <li>No surface or subsurface soil COCs identified based on the Risk Assessment Re-evaluation.</li> </ul>
2006	<i>Proposed Plan, Site 14, Short-Term Sanitary Landfill, NAS Whiting Field, Milton, Florida</i> , (TtNUS, 2006b)	<ul style="list-style-type: none"> <li>Established public comment period from Aug 15 through Sept 14, 2006.</li> </ul>	<ul style="list-style-type: none"> <li>Proposed remedy: No Action for Site 14 surface and subsurface soils</li> <li>No comments received.</li> </ul>

Notes:

EP = extraction procedure	FDEP = Florida Department of Environmental Protection
HLA = Harding Lawson Associates	TtNUS = Tetra Tech NUS, Inc.
BAT = Bengt-Arne-Torstensson	USEPA = United States Environmental Protection Agency
HHRA = human health risk assessment	SCTLs = Soil Cleanup Target Levels
ERA = ecological risk Assessment	COC = chemicals of concern

### **2.3 HIGHLIGHTS OF COMMUNITY PARTICIPATION**

The FSA (TtNUS, 2006a) and Proposed Plan (TtNUS, 2006b) for Site 14 were made available to the public for review in August 2006. These documents, and other IR program information, are contained within the Administrative Record in the Information Repository at the West Florida Regional Library, Milton, Florida.

The notice of availability of all site-related documents was published in the Santa Rosa Press Gazette and Pensacola News Journal on 12 August and 13 August 2006, respectively, and targeted the communities closest to NAS Whiting Field. The availability notice presented information on the RI, FS, and FSA at Site 14 and invited community members to submit written comments on the Proposed Plan.

A public comment period was held from 15 Aug through 14 Sep 2006, to solicit comments on the Proposed Plan. The comment period included an opportunity for the public to request a public meeting; however, a public meeting was not held because one was not requested. The site-related documents were placed in the Information Repository and made available for the public to review. Comments received during the public comment period are presented in the Responsiveness Summary in Appendix A.

### **2.4 SCOPE AND ROLE OF REMEDIAL ACTION SELECTED FOR SITE 14**

As with many Superfund sites, the problems are complex at NAS Whiting Field. As a result, NAS Whiting Field has been organized into 27 OUs. The Proposed Plan recommended NA for surface and subsurface soils at OU 13, Site 14, the subject of this ROD. Therefore, this ROD addresses surface and subsurface soil contamination and presents the final response action as NA for surface and subsurface soils at OU 13, Site 14 only. The groundwater at NAS Whiting Field has been designated as a separate site (Site 40, Basewide Groundwater) and is not addressed in this ROD. There is no surface water or sediment at Site 14.

### **2.5 SITE CHARACTERISTICS**

Site 14, Short-Term Sanitary Landfill, is approximately three acres in size and is located along the southeastern facility boundary near the South Air Field at NAS Whiting Field. The site is square in shape, relatively flat, and oriented north to south.

## **2.5.1 Nature and Extent of Contamination**

As part of the RI conducted for Site 14, data were collected to determine the nature and extent of releases of site-derived contaminants in surface and subsurface soil, to identify potential pathways of migration in surface and subsurface soil, and to evaluate risks to human and ecological receptors.

During the RI, two VOCs, two SVOCs, 19 inorganic compounds were detected in the surface soil and four VOCs, three SVOCs, and 19 inorganic compounds were detected in the subsurface soil at Site 14 as presented in Section 2.5. The individual inorganic constituents, arsenic, aluminum, iron, manganese, and vanadium, detected at the site have no direct evidence of site-related use at Site 14 and the procedures at this site did not likely contribute to the presence of these inorganics in surface soil. Additionally, the site-specific values for these inorganics are within the range of levels found at NAS Whiting Field. Considering the information presented above, arsenic, aluminum, iron, manganese, and vanadium were dropped from consideration as COPCs for Site 14 surface and subsurface soils.

### **2.5.1.1 Surface Soil**

Surface soil sampling was conducted at Site 14 to determine the nature and extent of contamination at the site and to assess whether or not surface soil could potentially serve as an exposure pathway to human or ecological receptors. Constituents detected in surface soil at Site 14 included two VOCs, two SVOCs, 19 inorganic compounds, and cyanide. No COPCs were identified and no human health risks were identified for exposure to surface soils at Site 14.

A complete list of all constituents sampled and their detected concentrations in surface and subsurface soil is available in the RI report (HLA, 1999).

### **2.5.1.2 Subsurface Soil**

Subsurface soil sampling was conducted at Site 14 to determine the nature and extent of contamination at the site and to assess whether or not subsurface soil could potentially serve as an exposure pathway to human or ecological receptors. Constituents detected in subsurface soil at Site 14 included, four VOCs, three SVOCs, and 19 inorganic compounds. No COPCs were identified and no human health risks were identified for exposure to subsurface soils at Site 14.

A complete list of all constituents sampled and their detected concentrations in subsurface soil is available in the RI report (HLA, 1999).

### **2.5.2            Ecological Habitat**

Site 14 is limited in the quantity and quality of habitat for ecological receptors. Most importantly, the site comprises only a small portion of the home ranges of most wildlife and the limited size and habitat of the site serves to restrict the amount of food available to upper tropic level organisms.

### **2.5.3            Migration Pathways**

No constituents of concern (COCs) were identified for exposure to surface and subsurface soils at Site 14, therefore; migration pathways, including the leaching of constituents from the soil to groundwater, are not a concern.

### **2.5.4            Current and Potential Future Land Use**

The current and anticipated future land use at Site 14 is recreational.

## **2.6                SUMMARY OF SITE RISKS**

The revised HHRA and the ERA provide the basis for selecting the RA for Site 14. The HHRA was revised to evaluate the changed conditions at the site and changes in the regulatory screening criteria. This section of the ROD summarizes the results of the HHRA and the ERA for Site 14.

### **2.6.1            HHRA**

The HHRA was revised at Site 14 to characterize the risks associated with potential exposures to site-related contaminants for human receptors. The revised HHRA is provided in Section 8.0 of the *Risk Assessment Re-evaluation of Soils at Sites 9, 10, 11, 12, 13, 14, 15, 16, 17, and 18* report (TtNUS, 2006a). No COCs were identified and no human health risks were identified for surface or subsurface soils at Site 14 under a residential land use scenario.

#### **2.6.1.1        Risk Characterization**

For the risk characterization at Site 14 potential risks were estimated for five receptors (the hypothetical future resident, the typical industrial worker, the construction worker, the maintenance worker, and the recreational user/trespasser). Potential risks were calculated using the methodology presented in Section 2.0 of the revised HHRA (TtNUS, 2006c).

COPCs for the Site 14 were selected using available background concentrations for soil. Aluminum, arsenic, iron, manganese, and vanadium in surface soil and aluminum, arsenic, iron, and vanadium in subsurface soil were eliminated as COPCs, in part, on the basis of naturally occurring concentrations.

Although concentrations of arsenic and vanadium in surface and subsurface soil, (as discussed above in Section 2.2.2, exceed respective screening criteria, these inorganics are not known to be associated with past practices or processes at any NAS Whiting Field sites. Soils associated with NAS Whiting Field landfills are composed of natural soil covers and do not reflect landfill contents. Therefore, these inorganics were not retained as COPCs for direct contact exposures to soil at Site 14.

### **2.6.2**            **ERA**

A screening ecological risk assessment (SERA) was performed for Site 14. The results of the SERA analysis indicate the constituents detected in the surface and subsurface soil at Site 14 do not pose unacceptable risks to ecological receptors and will not be evaluated further. Therefore; no COCs were selected for surface or subsurface soil at Site 14 based on the SERA.

### **2.6.3**            **Risk Summary**

The risk assessment considered five receptors, the hypothetical future resident, the typical industrial worker, the construction worker, the maintenance worker, and the recreational user, assuming exposure via the ingestion, dermal contact, and inhalation routes of exposure. However, with the possible exception of the maintenance worker, none of the receptors are currently contacting surface or subsurface soils at Site 14.

No unacceptable human health or ecological risks have been identified for Site 14 surface and subsurface soils.

The risk assessment conducted per the State of Florida and USEPA regulations and guidelines evaluated risks to a hypothetical future resident and a typical industrial worker using the published SCTLs for the residential and industrial land use scenarios, respectively. Additionally, risks to a hypothetical future recreational user were evaluated using SCTLs specifically developed for this risk assessment as allowed in the State of Florida regulations and guidelines. No constituents were selected as COCs for surface or subsurface soil.

### 2.6.3.1 Uncertainty Analysis

General uncertainties associated with the risk estimation process and site-specific uncertainties are discussed or referenced in the RI. Uncertainties associated with the revised HHRA for surface and subsurface soil at Site 14 are summarized below:

- Overall site-related risks from soil may be overestimated by the background screening process.
- Potential risks are likely to be overestimated as a result of using the maximum concentration for the constituents.

## 2.7 REMEDIAL ACTION OBJECTIVES

The Remedial Action Objectives (RAOs) for Site 14 are:

- To comply with federal and state applicable or relevant and appropriate requirements (ARARs) and to be considered (TBC) guidance in accordance with accepted USEPA and FDEP guidelines.

## 2.8 DESCRIPTION OF ALTERNATIVES

As stated in the Proposed Plan (TtNUS, 2006b) and in previous sections of this document, the three remedial alternatives evaluated in the FS for Site 14 (HLA, 2001) require re-evaluation based on the revised HHRA (TtNUS, 2006a). Cleanup alternatives were developed by the Navy, the USEPA, and the FDEP. The three remedial alternatives are listed below and summarized in Table 2-2.

**Alternative 1:** NA

**Alternative 2:** Land Use Controls (LUCs)

**Alternative 3:** Soil Removal and LUCs

These alternatives were developed in consideration of site risks, the anticipated future non-residential/recreational land use, federal and state ARARs and guidance, and the limited ecological habitat at Site 14. These alternatives primarily address protection of human health because, as discussed previously, potential risks to ecological receptors are acceptable. A detailed description of the three alternatives is provided below.

**Alternative 1:** NA. This alternative is required by CERCLA as a baseline for comparison with the other alternatives. The NA alternative assumes no RA would occur and establishes a basis for comparison with the other alternatives. No RA, treatment, LUCs, or monitoring of site conditions would be

TABLE 2-2

**SUMMARY OF REMEDIAL ALTERNATIVES EVALUATED  
RECORD OF DECISION  
SITE 14, SHORT-TERM SANITARY LANDFILL  
NAVAL AIR STATION WHITING FIELD  
MILTON, FLORIDA**

<b>Alternative</b>	<b>Description of Key Components</b>	<b>Cost<sup>(1)</sup></b>	<b>Duration<sup>(2)</sup></b>
<b>Alternative 1: No Action</b>	No remedial actions are performed at Site 14	\$0	30 Years
<b>Alternative 2: LUCs</b>	Post warning signs.  Implementation of LUCs will address soil for residential standards. An RD will be submitted to USEPA and FDEP and will detail the implementation plans to prohibit residential use of the property.	\$103,000	30 Years
<b>Alternative 3: Surface and Subsurface Soil Removal (exceeding CGs) and LUCs</b>	Develop project plans for excavation to include delineation/confirmatory sampling.  Excavate surface and subsurface soils exceeding residential land use CGs.  Backfill excavated areas with clean soil and provide a vegetative cover for nonpaved areas.  Post warning signs.  Implementation of LUCs will address soil for residential standards. An RD will be submitted to USEPA and FDEP and will detail the implementation plans to maintain the site for nonresidential purposes.	NA	30 years

<sup>(1)</sup> Net present worth costs rounded to the nearest thousand dollars.

<sup>(2)</sup> A period of 30 years was chosen for present worth costing purposes only. Under CERCLA, remedial actions must continue as long as hazardous substances, pollutants, or contaminants remain at a site.

Notes: CG(s) = Cleanup goal(s)  
FDEP = Florida Department of Environmental Protection  
LUC(s) = land use control(s)  
RD = Remedial Design  
USEPA = United States Environmental Protection Agency

implemented under the NA alternative. Alternative 1 meets chemical-specific ARARs, and there are no action-specific ARARs for this alternative.

**Alternative 2:** LUCs. LUCs are to prohibit the disturbance of existing soil and to prohibit future use of the site for non-residential purposes precluding full-time human contact with contaminated surface or subsurface soils. Future and current land-use concerns are addressed by the LUCs. Alternative 2 achieves compliance with chemical-specific ARARs by implementing LUCs to prevent exposure to surface and subsurface soils exceeding cleanup goals (CGs). Compliance with action-specific ARARs would be achieved by proper selection, implementation, and maintenance of LUCs.

**Alternative 3:** Soil Removal and LUCs. This alternative involves removal and off-site disposal of surface and subsurface soil exceeding levels allowed for Florida residential sites and LUCs, as described above. Alternative 3 meets chemical-specific ARARs for surface and subsurface soils. Compliance with action-specific ARARs would be achieved by proper design and execution of contaminated soil removal and off-site disposal activities.

## **2.9 SUMMARY OF THE COMPARATIVE ANALYSIS OF ALTERNATIVES**

This section evaluates and compares each of the soil remedial alternatives with respect to the nine criteria outlined in Section 300.430(e) of the NCP. These criteria are categorized as threshold, primary balancing, and modifying and are further explained in Table 2-3. A detailed analysis was performed for each alternative using the nine criteria to select a remedy. Table 2-4 presents a summary comparison of these analyses.

## **2.10 SELECTED ALTERNATIVE**

### **2.10.1 Summary of Rationale for Remedy**

The goals of the selected RA are to protect human health and the environment by eliminating, reducing or controlling hazards posed by the site and to meet ARARs. Based upon the consideration of the requirements of CERCLA, the NCP, the detailed analysis of alternatives, and public comments, Alternative 1 – NA (as described in the FS) was selected to address surface and subsurface soils at Site 14.

**TABLE 2-3**  
**EXPLANATION OF DETAILED ANALYSIS CRITERIA**  
**RECORD OF DECISION**  
**SITE 14, SHORT-TERM SANITARY LANDFILL**  
**NAVAL AIR STATION WHITING FIELD**  
**MILTON, FLORIDA**

Criterion	Description
Threshold	<p><b>Overall Protection of Human Health and the Environment.</b> This criterion evaluates the degree each alternative eliminates, reduces, or controls threats to human health and the environment through treatment, engineering methods, or institutional controls (e.g., access restrictions).</p> <p><b>Compliance with State and Federal Regulations.</b> The alternatives are evaluated for compliance with environmental protection regulations determined to be applicable or relevant and appropriate to the site conditions.</p>
Primary Balancing	<p><b>Long-Term Effectiveness and Permanence.</b> The alternatives are evaluated based on their ability to maintain reliable protection of human health and the environment after implementation.</p> <p><b>Reduction of Contaminant Toxicity, Mobility, and Volume Through Treatment.</b> Each alternative is evaluated based on how it reduces the harmful nature of the contaminants, their ability to move through the environment, and the amount of contamination.</p> <p><b>Short-Term Effectiveness.</b> The potential risks to workers and nearby residents posed by implementation of a particular remedy (e.g., whether or not contaminated dust will be produced during excavation), as well as the reduction in risks resulting from controlling the contaminants, are assessed. The length of time needed to implement each alternative is also considered.</p> <p><b>Implementability.</b> Both the technical feasibility and administrative ease (e.g., the amount of coordination with other government agencies needed) of a remedy, including availability of necessary goods and services, are assessed.</p> <p><b>Cost.</b> The benefits of implementing a particular alternative are weighted against the cost of implementation.</p>
Modifying	<p><b>USEPA and FDEP Acceptance.</b> The final Feasibility Study and the Proposed Plan, placed in the Administrative Record, represent a consensus by the Navy, USEPA, and FDEP.</p> <p><b>Community Acceptance.</b> The Navy assesses community acceptance of the selected alternative by giving the public an opportunity to comment on the remedy selection process and the selected alternative and then responds to those comments.</p>

**TABLE 2-4**  
**SUMMARY OF COMPARATIVE ANALYSIS OF SOIL REMEDIAL ALTERNATIVES**  
**RECORD OF DECISION**  
**SITE 14, SHORT-TERM SANITARY LANDFILL**  
**NAVAL AIR STATION WHITING FIELD**  
**MILTON, FLORIDA**  
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<b>Evaluation Criteria</b>	<b>Soil Alternative 1: No Action</b>	<b>Soil Alternative 2: LUCs</b>	<b>Soil Alternative 3: Limited Soil Removal and LUCs</b>
Overall Protection of Human Health and Environment	Would be protective to human receptors exposed to soils at the site.	Would be protective to human receptors. LUCs would prevent unacceptable potential exposure because residential use would be prohibited.	Would be most protective because all surface and subsurface soils exceeding CGs would be removed, eliminating the risk of exposure. LUCs would prevent potential residents from coming into contact with soil exceeding residential standards at the site. Would also provide protection to ecological receptors however, may end up altering the ecological habitat at the site.
Compliance with ARARs and TBCs: Chemical-Specific Location-Specific Action-Specific	Would comply Not applicable Not applicable	Would comply Not applicable Would comply	Would comply Not applicable Would comply
Long-Term Effectiveness and Permanence	Would have long-term effectiveness and permanence. Any long-term effectiveness would not be known since monitoring would not occur.	Would provide long-term effectiveness and permanence through LUCs preventing residential development. LUCs would preclude existing soil disturbance. Would require long-term management would be administered by the facility through implementing an approved Remedial Design.	Would provide highest level of long-term effectiveness and permanence by active removal of all impacted soil exceeding residential cleanup levels, reducing residual risk from impacted soil left at the site and by implementing LUCs to prevent residential development. Would require long-term management and five-year reviews. LUCs would be administered by the facility through implementing an approved RD.
Reduction of Contaminant Toxicity, Mobility, or Volume through Treatment	Would not achieve reduction of toxicity, mobility, or volume of contaminants through treatment but may achieve some reduction through natural processes.	Would not achieve reduction of toxicity, mobility, or volume of contaminants through treatment but may achieve some reduction through natural processes.	Would permanently and significantly reduce mobility of contaminants by excavation, transport, and disposal of impacted soil in a secure, regulated landfill. Provides the greatest reduction of risk through soil removal and off-base disposal. Toxicity of excavated soil may be reduced by treatment at a TSDF.

**TABLE 2-4**  
**SUMMARY OF COMPARATIVE ANALYSIS OF SOIL REMEDIAL ALTERNATIVES**  
**RECORD OF DECISION**  
**SITE 14, SHORT-TERM SANITARY LANDFILL**  
**NAVAL AIR STATION WHITING FIELD**  
**MILTON, FLORIDA**  
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<b>Evaluation Criteria</b>	<b>Soil Alternative 1: No Action</b>	<b>Soil Alternative 2: LUCs</b>	<b>Soil Alternative 3: Limited Soil Removal and LUCs</b>
Short-Term Effectiveness	Would not result in short-term risks to site workers or adversely impact the surrounding community and would not achieve the soil RAOs and CGs.	Would not result in short term risks to site workers or adversely impact the surrounding community and would not achieve the soil CGs.  Estimated time to reach RAOs is less than one year.	Would create potential short term risk to site workers during excavation. Would pose potential short-term risks to community members due to spills during transportation of contaminated soil to an off-site landfill. Environmental impacts (fugitive dust and runoff) are expected to be minimal. Engineering controls would minimize any environmental impacts. RAOs and CGs would be met within less than one year.
Implementability	Would be simple to implement because there would be no action.	Would be easily implemented. Would require monitoring of the site and potential exposure. Equipment, specialists, and materials for this alternative are readily available.	Would be easily implemented. This remedial technology is proven and reliable. Would require use of a TSDF, which are available and have sufficient capacity to meet the requirements of this alternative. Equipment, specialists, and materials for this alternative are readily available.
Cost: Capital NPW O&M (30 year) Total cost, NPW (30 year)	\$0 \$0 \$0	\$23,000 \$80,000 \$103,000	NA NA NA

CG = Cleanup Goal  
LUC = Land Use Control  
NPW = Net Present Worth  
PPE = personal protection equipment  
RAO = Remedial Action Objective  
RD = Remedial Design  
TSDF = Transport, Storage, and Disposal Facility

This remedy was selected for the following reasons:

- No COCs were identified and no human health risks were identified for surface or subsurface soils at Site 14 under a residential land use scenario.
- Potential ecological risks are acceptable. The site comprises only a small portion of the home ranges of most of the terrestrial wildlife species found on the base.
- The current and future use of the property at this site remains recreational and the current and future receptors are construction workers and the recreational user/trespasser.

#### **2.10.2 Remedy Description – No Action**

The selected remedy for Site 14 is NA for surface and subsurface soils.

#### **2.10.3 Summary of Estimated Remedy Costs**

There will be no cost for the NA alternative because there is no RA to be implemented. The information is based on the best available information regarding the anticipated scope of the remedial alternative. Major changes may be documented in the form of a memorandum in the Administrative Record file, an explanation of significant differences, or a ROD amendment as approved by USEPA and FDEP.

#### **2.10.4 Expected Outcome of the Selected Remedy**

Immediately upon implementation, Site 14 will be environmentally safe for unrestricted use and unlimited exposure.

### **2.11 STATUTORY STATEMENT**

The alternative selected for Site 14 is consistent with the Navy's IR program, CERCLA, and NCP. The selected remedy for surface and subsurface soil is protective of human health and the environment. No unacceptable short-term risks or cross-media impacts will be caused by implementation of the remedy.

Table 2-5 provides a summary of ARARs and guidance documents specific to the selected remedy.

The selected remedy is cost effective and provides a balance between cost and overall effectiveness in the protection of human health and the environment.

### **2.12 DOCUMENTATION OF SIGNIFICANT CHANGES**

No significant changes have occurred at Site 14 since the public comment period for the Proposed Plan (TtNUS, 2006b).

**TABLE 2-5**  
**SUMMARY OF FEDERAL AND STATE ARARS AND GUIDANCE SPECIFIC TO SELECTED REMEDY**  
**RECORD OF DECISION**  
**SITE 14, SHORT-TERM SANITARY LANDFILL**  
**NAVAL AIR STATION WHITING FIELD**  
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<b>Authority</b>	<b>Requirement</b>	<b>Citation</b>	<b>Status/Type</b>	<b>Synopsis</b>	<b>Evaluation/Action To Be Taken</b>
Federal Regulatory Requirement	USEPA Region IX Preliminary Remedial Goals (PRGs)		Relevant and Appropriate / Chemical-Specific	These guidelines aid in the screening of constituents in soil. USEPA has requested use of these PRGs as ARARs at NAS Whiting Field.	Will be used to identify constituents of concern (COCs) and for the development of soil cleanup goals at this site
Federal Regulatory Requirement	Cancer Slope Factors (CSFs)		TBC / Chemical-Specific	Guidance values used to evaluate the potential carcinogenic hazard caused by exposure to contaminants.	Were considered for development of human health protection PRGs for soil at this site
Federal Regulatory Requirement	Reference Doses (RfDs)		TBC / Chemical-Specific	Guidance values used to evaluate the potential noncarcinogenic hazard caused by exposure to contaminants	Were considered for development of human health protection PRGs for soil at this site
State Regulatory Requirement	Contaminant Cleanup Target Levels Rule [Soil Cleanup Target Levels (SCTLs)]	F.A.C. Chapter 62-777	TBC / Chemical-Specific	This rule provides guidance for soil cleanup levels developed on a site-by-site basis.	Will be used to identify COCs and for the development of soil cleanup goals at this site.
Federal Regulatory Requirement	Occupational Safety and Health Administration (OSHA) General Industry Standards	29 CFR Part 1910	Applicable / Action Specific	Requires establishment of programs to assure worker health and safety at hazardous waste sites, including employee-training requirements	These regulations will apply to all soil remedial activities at Site 14.
Federal Regulatory Requirement	OSHA, Occupational Health and Safety Regulations	29 CFR Part 1910, Subpart Z	Applicable / Action Specific	Establishes permissible exposure limits for workplace exposure to a specific listing of chemicals	Will be applied to control worker exposure to OSHA hazardous chemicals during remedial activities.
Federal Regulatory Requirement	OSHA, Recordkeeping, Reporting, and Related Regulations	29 CFR Part 1904	Applicable / Action Specific	Provides recordkeeping and reporting requirements applicable to remedial activities.	These requirements will apply to all site contractors and subcontractors and will be followed during all site work.

**TABLE 2-5**  
**SUMMARY OF FEDERAL AND STATE ARARS AND GUIDANCE SPECIFIC TO SELECTED REMEDY**  
**RECORD OF DECISION**  
**SITE 14, SHORT-TERM SANITARY LANDFILL**  
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<b>Authority</b>	<b>Requirement</b>	<b>Citation</b>	<b>Status/Type</b>	<b>Synopsis</b>	<b>Evaluation/Action To Be Taken</b>
Federal Regulatory Requirement	OSHA, Health and Safety Standards	29 CFR Part 1926	Applicable / Action Specific	Specifies the type of safety training, equipment, and procedures to be used during the site investigation and remediation.	All phases of the remedial response project will be executed in compliance with these standards.
Federal Regulatory Requirement	CERCLA and the NCP Regulations	40 CFR, Section 300.430	Applicable / Action Specific	Discusses the types of institutional controls to be established at CERCLA sites.	These regulations may be used as guidance in establishing appropriate institutional controls at Site 14.
State Regulatory Requirement	Florida Rules on Hazardous Waste Warning Signs	F.A.C. Chapter 62-730	Applicable / Action Specific	Requires warning signs at NPL and FDEP-identified hazardous waste sites to inform the public of the presence of potentially harmful conditions.	This requirement will not be met.
Federal Regulatory Requirement	NA	NA	NA	NA	There are no Federal Location-Specific ARARs specific to this site.

Notes: NA = Not Applicable

## REFERENCES

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TtNUS, 2006b. *Proposed Plan for Site 14, Short-Term Sanitary Landfill, Naval Air Station Whiting Field, Milton, Florida*. Prepared for NAVFAC SE, North Charleston, South Carolina. July.

TtNUS, 2006c. *Risk Assessment Re-evaluation for Soils at Sites 9, 10, 11, 12, 13, 14, 15, 16, 17, and 18, Naval Air Station Whiting Field, Milton, Florida*. Prepared for NAVFAC SE, North Charleston, South Carolina. October.

**APPENDIX A**

**COMMUNITY RELATIONS  
RESPONSIVENESS SUMMARY**

**Responsiveness Summary  
Site 14, Short-Term Sanitary Landfill  
Naval Air Station Whiting Field  
Milton, Florida**

A public comment period on the Site 14 Proposed Plan was held from 15 Aug 2006 through 14 Sep 2006.

No public comments were received, and because a public meeting was not requested one was not held.