

N60508.AR.000239
NAS WHITING FIELD
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON SITES 10 AND 11 DRAFT
RECORD OF DECISION NAS WHITING FIELD FL
8/1/2007
U S EPA REGION IV

Site 10 Draft Record of Decision:

- **Section 1.3, Page 1-3:** In the second bulleted item, add the word “the” in front of USEPA in the second and third lines of the paragraph. The last sentence of this page should be revised as follows: ...to protect public health, welfare, or the environment...”.
- **Section 1.4, Page 1-4:** In the fourth paragraph on this page, add “the document” in between “submit” and “to the USEPA” in the first sentence.
- **Section 1.5, Page 1-5:** In the third sentence of the second paragraph, “unlimited use and unrestricted exposure” should be changed to “unrestricted use and unlimited exposure”.
- **Section 1.7, Page 1-7:** Change the Navy signature line to the current commanding officer of NAS Whiting Field. Delete “Waste Management” under the signature line for Franklin Hill.
- **Section 2.1, Page 2-1:** Delete the last sentence of the third paragraph. It was stated previously in this section that no surface water exists at the site.
- **Section 2.4, Page 2-6:** Please check the font size for the first paragraph. It appears the font is smaller in the middle of the paragraph than it is in the rest of the paragraph.
- **Section 2.5.2, Page 2-8:** Change “serve” to “serves” in the second sentence.
- **Section 2.5.3, Page 2-8:** Change “Site 11” to “Site 10” in the fourth paragraph.
- **Table 2-2, Page 2-14:** In the Description of Key Components for Alternative S10-2, delete the word “of” after the word “Implement” in the first sentence of the fourth item.
- **Section 2.10.1, Page 2-16:** In the fourth bulleted item, insert “a” between “with” and “24-inch”.
- **Section 2.11, Page 2-22:** Insert the word “the” before “NCP” in the first sentence.
- **Section 2.11.2, Page 2-24:** Throughout this section the word “siting” is used. I believe the correct word to use in this context is “citing”. Please verify and correct as necessary.
- **Section 2.11.5, Page 2-25:** In the first sentence, “unlimited use and unrestricted exposure” should be changed to “unrestricted use and unlimited exposure”.

Site 11 Draft Record of Decision:

- **Section 1.3, Page 1-3:** In the second bulleted item, add the word “the” in front of USEPA in the second and third lines of the paragraph. The last sentence of this page should be revised as follows: ...to protect public health, welfare, or the environment...”.
- **Section 1.3, Page 1-4:** The last sentence of this section should be revised as follows: ...to protect public health, welfare, or the environment...”.
- **Section 1.4, Page 1-4:** In the fourth paragraph on this page, add “the document” in between “submit” and “to the USEPA” in the first sentence.
- **Section 1.5, Page 1-5:** In the third sentence of the second paragraph, “unlimited use and unrestricted exposure” should be changed to “unrestricted use and unlimited exposure”.

- **Section 1.7, Page 1-7:** Change the Navy signature line to the current commanding officer of NAS Whiting Field. Delete “Waste Management” under the signature line for Franklin Hill.
- **Section 2.2.2, Page 2-3:** In the third paragraph of this section, the text states that samples were collected at locations where “surface geophysical anomalies” were interpreted to be present. Usually geophysical techniques are utilized to investigate the subsurface soil strata. Is “surface geophysical anomalies” the correct term to use in this context? Please verify and correct if necessary. In the fourth paragraph, please insert “during an” in between “1999” and “interim”.
- **Section 2.4, Page 2-6:** Please check the font size for the first paragraph. It appears the font is smaller in the middle of the paragraph than it is in the rest of the paragraph.
- **Section 2.5.2, Page 2-8:** Change “serve” to “serves” in the second sentence.
- **Section 2-8, Page 2-14:** The third sentence of the description of Alternative S11-2 should be reworded as follows: “The LUCs for Site 11 would limit exposure to soil contamination through a digging prohibition or otherwise disturbing the existing soil cover and the use of warning signs. The LUCs would also insure an appropriate non-residential future land use.”
- **Section 2.11, Page 2-24:** Insert the word “the” before “NCP” in the first sentence.
- **Section 2.11.2, Page 2-26:** Throughout this section the word “siting” is used. I believe the correct word to use in this context is “citing”. Please verify and correct as necessary.
- **Section 2.11.5, Page 2-27:** In the first sentence, “unlimited use and unrestricted exposure” should be changed to “unrestricted use and unlimited exposure”.

The following comments were prepared by Susan Capel, EPA attorney:

Whiting Sites 10 & 11
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1. Section 1.4, Description of the Selected Remedy, 2nd paragraph - Delete the last sentence. It does not accurately state the basis for selecting a remedy. CERCLA Section 121(b) does not include ARARs as a basis for selecting a remedy. Remedies selected for comparison using the criteria under CERCLA Section 121(b) should be ARAR-compliant, but ARARs, in and of themselves, are not the basis for selecting a remedy.
2. Section 1.4 - The bulleted items are LUC **objectives**. Please revise.
3. Section 2.6.1.1, Carcinogenic Risk, first paragraph - delete “the FDEP target level of”; second paragraph, first sentence - Delete “the State of Florida cancer risk benchmark of”
4. Section 2.6.3, second paragraph, second sentence. Delete same phrase as required in Section 2.6.1.1., Carcinogenic Risk, second paragraph.

Whiting Site 11

1. Same as #1 above
2. Same as #2 above
3. Same as #3 above