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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 16 FEASIBILITY STUDY ADDENDUM NAS WHITING FIELD FL
3/3/2008
U S EPA REGION IV

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

March 3, 2008

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:

- **Feasibility Study Addendum for Operable Unit 15 - Site 16, Open Disposal and Burning Area Surface and Subsurface Soil at Naval Air Station Whiting Field, Rev. 0, November 2007.** (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: John Winters, FDEP

EPA Review Comments
Site 16 Feasibility Study Addendum
Surface and Subsurface Soils
NAS Whitiug Field
Dated, November 2007

1. **Section 2.0, Page 2-1:** Please insert the abbreviation "RI" in between the words "the" and "Phase IIB" in the fifth paragraph.
2. **Section 2.2.2, Page 2-6:** The first sentence of the fourth paragraph should be rewritten for clarity as it relates to the surface soil SCTL table provided on this page. In addition, the sentence under the subsurface soil SCTL table should be revised for clarity as well. The text should explain which constituents are considered COCs based on the exposure scenario evaluated not based on which type of SCTL was exceeded.
3. **Section 2.2.3, Page 2-7:** The title of the Ecological Risk Assessment for Superfund guidance document should be italicized or placed in quotation marks in the first sentence of this section. In the second sentence of the second paragraph, delete the word "site" and insert "site related" in between the words "of" and "contaminants". In addition, the term "conservative screening values" is used; however, there is no reference for the screening values used. Please keep in mind that once this document is finalized it will be made available to the public for review and should contain references to all screening values. In the seventh sentence of the second paragraph, the term "soil guidelines" is used. Please provide a reference to the soil guidelines used. In the ninth sentence of the second paragraph, please indicate which RI phase Samples 16S007 and 16S011 were collected.
4. **Section 2.2.4, Page 2-7:** In the second sentence of the second paragraph, please delete the word "hypothetically" and insert "hypothetical future" in between the words "the" and "resident".
5. **Section 2.2.4, Page 2-8:** In the paragraph at the top of this page, the text states that the ILCRs for chromium exceeded the risk for construction workers; however, the text does not provide the actual risk to construction workers. Please provide this information in the document. In the third paragraph on this page, the text states that potential ecological risk is limited to the vicinity of sample locations 16S007 and 16S011. Please provide a brief explanation of the ecological risk in the vicinity of these two samples. In addition, please indicate the RI phase in which these samples were collected.
6. **Section 3.0, Page 3-1:** The revised RAO 2 serves to protect human health from non-carcinogenic risks; however, Section 2.2.4 on page 2-7 states that there is no non-carcinogenic risk. The statement on page 2-7 suggests this RAO is not necessary. Please revise the text as appropriate.
7. **Section 3.1, Page 3-2:** The second sentence of the first paragraph states that CGs are used to determine COCs; however, COCs are determined in the risk assessment before the CGs are determined. Please correct the text. In the third sentence of the second paragraph, the text states that the current use of the site is for recreational purposes; however, Section 2.0 on page 2-3 states that the site consists of vacant, unused land. Please revise the text as appropriate.
8. **Section 3.3, Page 3-5:** In the last sentence of the second paragraph, delete "directly bls" and insert "top" between the words "the" and "2".

9. **Section 4.1, Page 4-1:** In the second sentence of the first paragraph, delete the word "limiting". In the first sentence of the description of Alternative S16-1, the term "No Action" and "NFA" do not denote the same thing. No action means the site requires no action at all and NFA means that a previous action has taken place and the site currently requires no further action. Please correct the text as appropriate.
10. **Section 4.1, Page 4-3:** The second paragraph at the top of the page indicates that LUCs would be consistent with the presumptive remedy guidance for military landfill sites; however, Section 1.1 on page 1-2 states that this guidance was not applied to Site 16. Please correct the text as appropriate. Please change the title of Alternative S16-4 to "Limited Soil Removal and LUCs" since land use controls are a component of the alternative.
11. **Table 4-2, Page 4-4:** The table should indicate that the "Projected Present Worth Costs" are based on a 30-year projected timeframe.