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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 16 PROPOSED PLAN
NAS WHITING FIELD FL
7/28/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 28, 2008

4SF-FFB

Mr. Benjamin T. Kissam
NAVFAC SE
P.O. Box 30, Bldg. 103
NAS Jacksonville, Fl 32212-0030

SUBJECT: NAS Whiting Field, Florida
EPA ID# FL2170023244

Dear Mr. Kissam:

The United States Environmental Protection Agency (EPA) has received (electronically) and reviewed the following document:

- **Proposed Plan for Operable Unit 15 - Site 16, Open Disposal and Burning Area Surface and Subsurface Soil at Naval Air Station Whiting Field, Rev. 0, April 2008.** (Tetra Tech NUS, Inc.)

Enclosed are EPA's review comments. If you should have any questions, please contact me at (404) 562-8555 or by email at Benedikt.Craig@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Craig A. Benedikt".

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: John Winters, FDEP

**EPA Review Comments
OU 15 – Site 16 Proposed Plan
NAS Whiting Field
Dated, April 2008**

1. **Title, Page 1:** Please add the EPA ID number under the installation name.
2. **Site Characteristics, Page 1:** Please add that there is no surface water at Site 16 in the first paragraph of this section.
3. **Investigation Activities, Page 2:** Please rewrite the fourth sentence of the “Interim Remedial Action” paragraph for clarity. In addition, please spell out “SCTL” in the fourth sentence and provide a reference to the SCTLs used as this is the first occurrence of this abbreviation in the document.
4. **Investigation Findings, Page 2:** In the first bulleted item a more thorough explanation of how arsenic was determined to be naturally occurring should be provided or at least a reference should be provided to direct the reader to a document which provides this explanation. Please move the first sentence of the “General Site Conditions” to the “Site Characterization” section as this information is more appropriate to site characterization. Please remove or rewrite the second and fourth paragraphs of the “Soil Conditions” section as the information presented is confusing. The references to apportioned PRGs and SCTLs are too technical and confusing.
5. **Remedial Action Objectives, Page 3:** This section should present and describe the basis for preliminary cleanup levels for major contaminants of concern. *(Please see the Superfund Proposed Plan and ROD guidance)*
6. **Summary of Remedial Alternatives, Page 4:** The second sentence of the second paragraph in the description of Alternative S16-1, change “RAO” to “RAOs”. The description of the land use controls under Alternative S16-2 should include a digging prohibition.
7. **Evaluation of Alternatives, “Compliance with Applicable or Relevant and Appropriate Requirements (ARARs)”, Page 5:** Please delete the final sentence under Alternative S16-1 since arsenic is no longer considered a COC for Site 16.
8. **Evaluation of Alternatives, “Long-Term Effectiveness and Permanence”, Page 5:** Change the first sentence of the description of Alternative S16-1 as follows: “Since no action would be taken, human and ecological risks due to exposure to onsite soils would not be addressed via this alternative.” In the last sentence of the description of Alternative S16-1, delete “or until LUCs are implemented.” Please rewrite the description of Alternative S16-3 for clarity.

9. **Evaluation of Alternatives, “Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment”, Page 5:** In the description of Alternative S16-2, please delete “however, arsenic can form low solubility metal arsenates” from the second sentence. The statement made in the first sentence of the description of Alternative S16-4 is not entirely true. Because there would be limited soil removal, toxicity, mobility and volume would be affected at the site. The second sentence of the S16-4 description should state that the waste would be excavated, transported offsite and disposed of at an approved off-site disposal facility.
10. **Evaluation of Alternatives, “Implementability”, Page 6:** In the description of Alternative S16-2, the text states that no remedial construction would be required; however, onsite signage would be required which would require minimal remedial construction.
11. **Evaluation of Alternatives, “Cost”, Page 6:** The table indicates that the capital cost for S16-2 is \$111,000, while the text states that the capital cost is \$12,000. Please reconcile and include the correct value.
12. **Preferred Alternative, Page 6:** The description of Alternative S16-2 should also include a digging prohibition along with prohibiting soil removal. In addition, this section should address the uncertainty associated with not fully characterizing the landfill as the basis for taking an action when the risk is within EPA guidelines.
13. **Community Participation, Page 7:** The third sentence of the second paragraph in the first column should be rewritten as follows: “The RAB is provided with periodic updates on the status of ongoing Installation Restoration Program work at NAS Whiting Field.”
14. **Glossary of Terms, Page 8:** The definition of “Soil Cleanup Target Levels (SCTLs)” should reference Chapter 62-780 F.A.C. not Chapter 62-770 F.A.C. which applies to petroleum sites.

The following comments were provided by Ms. Martha Brock, Esq., from the Region 4 Environmental Accountability Division:

Comments

This review was conducted to verify consistency with CERCLA, the NCP and EPA guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Section Decision Documents* (Guidance).

1. **Introduction.** This section should state that the Proposed Plan is a document that the lead agency is required to issue to fulfill the public participation requirements under CERCLA and the NCP. Please add text to this section so stating.

2. **Introduction, paragraph 3, last sentence.** Please revise this sentence to read, “The Navy and EPA will select the remedial action for Site 16 after considering and addressing significant comments from the public.” If the Navy wishes to include a statement regarding implementation of the remedy, a sentence could be added following this one that states, “Following selection of the remedial action and any necessary design of the remedy, the Navy will implement the selected remedy.”
3. **Site Background, paragraph 2, last sentence.** This sentence would more clearly communicate the impact of the “incineration” if it read, “To help reduce waste volumes, diesel fuel was routinely applied to the waste on the ground and burned.” I think the point of the sentence is that waste was burned on the ground in the landfill, reducing the volume of waste, but also adding benzene to the ground surface, which means that unburned benzene could have migrated downward through the disposal pits. In addition, incineration implies a high-temperature process in which the material is reduced to ashes, and it would appear that “burn” more accurately describes the process, than “incinerate.”
4. **Site Background.** The Guidance suggests that this section describe any previous investigations and response actions. The Guidance also recommends that this section describe any major public participation activities, prior to issuing the Proposed Plan. Please include any information relevant to these issues, if it exists.
5. **Site Characteristics.** Investigation activities, Interim Remedial Action. Please provide a regulatory reference for the leachability criteria and SCTLs mentioned in the 4th sentence of this section. Spell out “SCTLs.” Identify the constituent associated with the leachability criteria and explain how leachability criteria is used in remediation. Also, explain why the excavation was backfilled when the soil data indicated exceedences.
6. **Site Characteristics.** Investigation activities, Interim Remedial Action. The Glossary references Florida Administrative Code Chapter 62-770 as the source of the SCTLs. According to Site Background, pain wastes, solvents, wastewater from paint stripping operations, and other refuse was disposed of in the pits. Explain why the facility is using the Petroleum Contamination Site Cleanup Criteria Regulations (Chapter 62-770) rather than the broader Contaminated Site Cleanup Criteria regulations under Chapter 62-780 since this unit managed materials other than those associated with petroleum products.
7. **Site Characteristics.** Investigation Findings, 2nd bullet. Provide a regulator citation or other means of location the screening criteria referenced in this bullet.
8. **Site Characteristics.** Investigation Findings, Soil Conditions. Clarify whether the soil concentrations listed here are pre-interim action or post-interim action. Are these concentrations limited to the area where the pits were located or are they spread throughout the site as a result of the excavation during the interim measure? Indicate the land use association with the PRGs and the SCTLs referenced in this section.

9. Scope and Role of OU15 – Site 16. According to the Guidance, this section should state the lead agency’s overall strategy for remediating the NPL site and how the action described in the Proposed Plan fits into that overall strategy. While this section states that OU 15- Site 16 is part of the Navy’s IRP and the 27 identified operable units, it might be helpful to say something like, “The Navy has divided the remediation at Whiting Field into xx operable units with xx sites. This is the xxth of xx Whiting Field sites to be remediated.”
10. Scope and Role of OU15 – Site 16. This section should describe the principal threat wastes that exist at the site. If principal threat wastes remain at the site following the Interim Remedial Action, this section should include that information. A “principal threat wastes” are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment should exposure occur. They include liquids and other highly mobile materials (e.g., solvents) or materials having high concentrations of toxic compounds.
11. Scope and Role of OU15 – Site 16, paragraph 2. This section states that the environmental investigation and study is being conducted consistent with or under certain authorities. In one instance, it states that it follows EPA-issues guidance, including the NCP. The NCP is a promulgated regulation, not EPA guidance. Please revise the text to so state.
12. Summary of Site Risks. Provide a citation for the Florida and EPA “target levels.”
13. Summary of Site Risks. Human Health Risks.
 - a. Provide a statutory or regulator citation for FDEP’s benchmark of 1 E-06/
 - b. Since the risk range is within EPA’s acceptable level under 40 CFR § 300.430(e)(2)(i)(A)(2), remedial action is generally not required. Please note that the benchmark does not, by itself, create a requirement to perform remediation under CERCLA. Please provide a specific explanation of the rationale for taking remedial action at this site, including any specific reference to Florida law.
14. Preferred Alternative. Please clarify how we select a preferred alternative when it does not comply with ARARs.