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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON OPERABLE UNIT 2 (OU 2) SITE 2 DRAFT RECORD OF DECISION NAS WHITING FIELD FL
8/25/2008
U S EPA REGION IV

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

August 25, 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:

- **Record of Decision Amendment for Operable Unit 2 – Site 2, Northwest Open Disposal Area, NAS Whiting Field, Rev. 1, April 2008.** (Tetra Tech NUS, Inc.)

Enclosed please find 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,

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

cc: John Winters, FDEP

EPA Review Comments
Record of Decision Amendment
For Operable Unit 2 – Site 2
Dated April 2008

1. **Section 1.1, Site Name and Location, Page 1-1:** Please include the National Superfund Database (CERCLIS) identification number. Please rewrite the second sentence as follows: "Operable Unit (OU) 2- Site 2, hereafter referred to as "Site 2", is a former borrow pit located on a 12-acre parcel along the northwestern facility boundary near the North Airfield."

2. **Section 1.2, Statement of Basis and Purpose, Page 1-1:** In the first sentence of the second paragraph, please add "September 1999" before the first occurrence of "ROD." In the second sentence of the second paragraph, change "facility wide" to "at Site 2". Please revise the third sentence of the second paragraph as follows: "A review of historical site activities at Site 2 does not support an anthropogenic source for arsenic at the site."

3. **Section 1.3, Assessment of Site, Page 1-3:** Please add after the last sentence, "It was determined that the arsenic at the site, which was the basis of the previous remedial decision, is naturally occurring, and not the result of a CERCLA release."

4. **Section 1.4, Description of the Selected Remedy, Page 1-3:** The first sentence should be revised as follows: "The Navy and USEPA, in conjunction with FDEP, selected LUCs as the remedy for Site 2 as documented in the September 1999 ROD (HLA, 1999)." Please add the following in between the first and second sentences: "Since waste was left onsite, 5-year reviews were required to assess the protectiveness of the remedy." In the second sentence, please delete "changes discussed previously," and insert in lieu thereof, "finding that arsenic was naturally occurring and not the result of a CERCLA release." In addition, please delete "further" and change "NFA" to "NA."

5. **Section 1.5, Statutory Determinations, Page 1-3:** Please delete the first two sentences in this section and insert, "No remedial action is necessary to ensure protection of human health and the environment." None of the CERCLA § 121 statutory determinations are necessary in this section since no remedy is being selected.

6. **Section 1.7, Authorizing Signatures, Page 1-5:** Please change "Franklin Hill" to "Franklin E. Hill".

7. **Section 2.1, Site Name, Location and Description, Page 2-1:** Please include the National Superfund Database (CERCLIS) identification number. In the second sentence of the first paragraph, please insert "characterized by" in between "is" and "a" and add "the" between "and" and "bottom". In the fifth sentence of the first paragraph, insert "the" in between "from" and "perimeter".

8. **Section 2.2.1, NAS Whiting Field History, Page 2-1:** Please spell out the abbreviation "O&M" in the second paragraph as this is the first occurrence of the abbreviation in the text of the document.

9. **Section 2.2.2, Site 2 History, Page 2-3:** It is not clear why the description of items 1 through 4 is included in the Site History. If included, then the lead-in sentence should be changed to reflect that the current use is restricted as a result of the 1999 ROD. Please change the text to read, "The current land use for Site 2 is recreational under the following conditions selected in the 1999 Record of Decision for Site 2."

10. **Table 2-1, Page 2-4:** It might be helpful to include in this chronology the 2001 determination by Florida that arsenic was naturally occurring. Please add. Please delete the reference to the "Explanation of significant differences (ESD)" as this step was never completed.

11. **Section 2.3, Public Participation Compliance, Page 2-5:** This section should explain how the public participation requirements in CERCLA and the NCP were met, not just merely state *that* they were met.

12. **Section 2.4, Scope and Role of Remedial Action Selected for Site 2, Page 2-5:** In the eighth sentence of the second paragraph, please change "facility wide is naturally occurring" to "at Site 2 is consistent with background concentrations found elsewhere at the installation."

13. **Section 2.5, Site Characteristics, Page 2-5:** In the second sentence of the first paragraph, please insert "characterized by" in between "is" and "a" and add "the" between "and" and "bottom". The seventh sentence states that there is no evidence of past waste disposal activities. This should state that there is no evidence of past hazardous waste disposal activities, since any of the items listed as having been disposed of in the borrow pit could be considered waste. Please clarify.

14. **Section 2.5.1, Nature and Extent of Contamination, Page 2-6:** In the last sentence, please change "no longer necessary" to "being removed in this ROD."

15. **Section 2.5.1.1, Surface Soil, Page 2-6:** Since this document is a ROD amendment, the following information should be conveyed in this section: "As a result of the removal of arsenic as a site-related contaminant, no COCs were identified in surface soil at Site 2."

16. **Section 2.5.1.2, Subsurface Soil, Page 2-7:** Delete everything in this section except for the following: "No COPCs were identified, and no human health risks were identified following the risk assessment for exposure to subsurface soils at Site 2."

17. **Section 2.5.2, Ecological Habitat, Page 2-7:** This section should state that since arsenic was removed as a COC, no ecological risk was identified for surface and subsurface soils at Site 2.

18. **Section 2.5.3, Migration Pathways, Page 2-7:** This section of the ROD is not necessary and should be deleted, since there are no longer any COCs associated with the site. Without COCs, a description of migration pathways is not necessary.

19. **Section 2.6, Summary of Site Risks, Page 2-8:** EPA strives for transparency in decision-making and supports advising citizens about the environmental and public health risks they face. Where, as here, some of the site risk is due to naturally-occurring arsenic, that presents a unique challenge to both manage the risk appropriately and to communicate the risk to the public. It appears to be inaccurate to state, as it is in several places in the PP, that the site poses no risk, when the background determination has no impact on site risk. It may be more accurate to communicate the existing risk but also that because CERCLA authorizes response to releases, and where, as here, the arsenic is not present as a result of a CERCLA release of hazardous substances; it is proposed that no response action be taken.

20. **Section 2.7, Description of Alternatives, Page 2-8:** This section should be deleted. Since the Navy and EPA, with concurrence of the state, have concluded that it is appropriate to revise the remedy from LUCs to No Action, the ROD Guidance explains that there is no development of alternatives.

21. **Table 2-2, Page 2-9:** Please delete under the same rationale as comment 20.

22. **Section 2.8, Summary of the Comparative Analysis of Alternatives, Page 2-10:** Please delete under the same rationale as comment 20.

23. **Section 2.9, Selected Alternative, Page 2-10:** Please delete this section, including all subsections, and reference tables 2-3 and 2-4 under the same rationale as comment 20.

24. **Section 2.10, Statutory Statement, Page 2-13:** Please delete under the same rationale as comment 20.

25. **Section 2.11, Documentation of Significant Changes, Page 2-13:** Please include a summary of the changes that resulted in revising the remedy from LUCs to No Action. Even though it has been discussed earlier, this is a logical place for a summary of the rationale.