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NAS WHITING FIELD
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LETTER RESPONDING TO ISSUES FROM THE 10 APRIL 1990 TECHNICAL REVIEW COMMITTEE MEETING NAS WHITING FIELD FL
5/25/1990
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UNITED STATES ENVIRONMENTAL P

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 25 1990

Ref: 4WD-RCRA&FF

Captain K. G. Johnson
Commanding Officer
Naval Air Station Whiting Field
Milton, Florida 32570-5000

Re: Response to April 10, 1990 Technical Review Committee at NAS Whiting Field

Dear Captain Johnson:

By this letter, EPA is responding to your April 10, 1990, request to enter into a Federal Facility Agreement (FFA) under Section 120 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) with EPA. EPA's national position is not to enter into Federal Facility Agreements under Section 120 of CERCLA until the Facility is proposed or very close to being proposed on the National Priorities List. However, EPA and the U. S. Navy can enter into a Consent Agreement under Section 106 of CERCLA at non-NPL sites to establish a formal, well-coordinated relationship between EPA and the Federal Facility with regards to response to releases or threatened releases impacting human health or the environment. The State can also join in this administrative action and become a third party to the Agreement.

You requested at the April 10, 1990, Technical Review Committee (TRC) meeting that EPA enter into an FFA with NAS Whiting Field to insure that the remedial investigation work at the base will not be considered inadequate due to future changes in guidance or technical requirements. Although EPA national policy applies Federal Facility Agreements under Section 120 of CERCLA to sites on the National Priorities List, we are committed to provide you with consistent technical review and comments to meet future CERCLA requirements. We believe that an Agreement under Section 106 of CERCLA is the appropriate vehicle and would represent a positive commitment by all parties to address priority environmental problems.

EPA would consider a Section 120 Agreement with the Navy if the facility submits data required under the new Hazardous Ranking System (HRS2) and it receives a sufficient preliminary score to proceed to a NPL listing. As you know, a ranking package was prepared for Whiting Field under the old Hazard Ranking System (HRS1), and the score for the base was high enough for NPL proposal. However, before the Whiting Field package could undergo quality assurance, new listings under HRS1 were suspended nationally. We consider it very likely that under the HRS2, Whiting Field will also score high enough to be proposed for the NPL. Therefore, we are enclosing a new Preliminary Assessment/Site Investigation checklist. If you collect and submit the data required on this list, EPA will prepare an HRS2

preliminary score on NAS Whiting Field. If the preliminary score is sufficient to proceed to an NPL listing, EPA would consider entering into an FFA with the Navy for Whiting Field at that time.

If you or your staff have additional questions on the CERCLA 106 Consent Agreement or need further clarification on EPA's position, please contact Ms. Dean at (404) 347-3016.

Sincerely yours,

James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

Enclosure

cc: Ted Campbell, NAVFAC, w/enclosures
James Malone, NAVFAC
Cindy Black, Whiting Field
Eriz Nuzie, FDER, w/enclosure