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NAS WHITING FIELD  
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LETTER REGARDING DRAFT FINAL RECORD OF DECISION, SITE 1 NORTHWEST  
DISPOSAL AREA NAS WHITING FIELD FL  
8/23/1999  
U S EPA REGION IV



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

August 23, 1999

4WD-FFB

Ms. Linda Martin  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
2155 Eagle Drive  
North Charleston, South Carolina 29419-9010

SUBJ: NAS Whiting Field, Milton, Florida  
EPA ID #: FL2 170 023 244

Dear Ms. Martin:

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

- **Draft Final Record of Decision, Site 1, Northwest Disposal Area (Harding Lawson Associates, May 1999).**

Enclosed are EPA's review comments. If you have any questions, please contact me at (404) 562-8555.

Sincerely,

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

Craig A. Benedikt  
Remedial Project Manager  
Federal Facilities Branch

cc: Jim Cason, FDEP

**EPA Review Comments  
Draft Final Record of Decision  
Site 1, Northwest Disposal Area  
May 1999**

1. **Page -i-, Table of Contents.** Any acronyms or abbreviations that appear in the table of contents should be spelled out in full since this is the first occurrence in the document.
2. **Page -ii-, List of Tables.** Place a comma in between *Summary* and *Current* in the listing for Table 2-3.
3. **Page -iii-, Glossary.** Capitalize the first word in the definition for each acronym.
4. **Page 1-1, Section 1.2.** The second paragraph should identify all the signatories to the memorandum of agreement. In the third paragraph of this section, it is unclear what is meant by condition certification. Please clarify this term. The last sentence of the third paragraph is confusing as written. Please reword the sentence to be more understandable. In first sentence of the fourth paragraph, insert the word *that* in between the words **FDEP** and **the**. In addition, the word **Station's** should be more thoroughly defined or changed to **NAS Whiting Field through.....** The second sentence of this paragraph should be rewritten as follows: "Should such compliance not occur or should the MOA be terminated, USEPA and FDEP reserve the right to reconsider the protectiveness of the remedy concurred upon in this Record of Decision (ROD) and USEPA and FDEP may require that NAS Whiting Field take additional measures to adequately ensure necessary future protection of human health and the environment."
5. **Page 1-2, Section 1.4.** The first sentence of the first paragraph should state that the ROD presents the final action for the surface and subsurface soils at Site 1 and is based on the results of the RI and FS completed for surface and subsurface soils for Site 1. The second sentence of this paragraph should state that "This ROD is not the final remedy for groundwater which is being addressed as a separate operable unit under Site 40. The third sentence should be reworded as follows: "The preferred RA at Site 1 is Alternative 2 (LUCs) and includes 5-year site reviews to evaluate the effectiveness of the LUCs."

In the second paragraph, the word *reduce* should be changed to *address* to reflect the fact that LUCs do not actively reduce the toxicity of site related contaminants. In addition, the text should make clear that the \$146,000 cost of implementing the remedy is a present day cost that does not account for inflation or other factors.

In the last sentence of the third paragraph, change the word *site* to *operable unit*.

6. **Page 1-2, Section 1.5.** This section should be rewritten as follows:

“The RA selected for surface and subsurface soils at Site 1 is protective of human health and the environment, complies with federal and State regulatory requirements legally applicable or relevant and appropriate (ARARs) to the RA, and is cost effective. This remedy does not utilize a permanent solution. Alternative treatment technologies were evaluated in the FS. However, because treatment of the principal threats was not found to be practicable, the selected remedy does not satisfy the statutory preference for treatment as a principal element. Since this remedy will result in hazardous substances remaining on site above health-based levels, a review will be conducted within 5 years after commencement of the RA to ensure the remedy continues to provide adequate protection of human health and the environment.”
7. **Page 1-2, Section 1.6.** A signature block for the State signatory should be provided.
8. **Page 2-1, Section 2.1.** The first sentence of this section should be reworded. Suggested wording is as follows: “Site 1, also known as the Northwest Disposal Area, is a 5-acre parcel of land located along the northwestern boundary of the installation near the North Air Field at NAS Whiting Field.” The term *facility* is typically used in the RCRA program and has a different meaning in CERCLA. In the second sentence, change the word **is** to **encompasses** (or something similar in meaning) in order to clarify the description of Site 1.
9. **Page 2-1, Section 2.2.** The third sentence suggests that site access was uncontrolled early in the site’s history but is controlled now. Additional information is needed to clarify the site’s status.
10. **Page 2-1, Section 2.4.** This section should contain the appropriate context for Site 1. Suggested wording is as follows: “ Site 1 is one of \_\_\_\_ sites under investigation at NAS Whiting Field. To expedite remediation efforts, Site 1 has been divided into two operable units based on media type. Operable unit one addresses surface and subsurface soil contamination and is the subject of this ROD. Operable unit two addresses groundwater contamination and will be the subject of a separate, future ROD (Site 40). The future groundwater operable unit will be the final response action for this site.”
11. **Page 2-6, Section 2.4.** In Item No. 2, insert the words **restricted use** after the word **and**. In Item No. 3, the term *Department* should be better defined. It is assumed that the term refers to FDEP; however, this is not made clear. In the second sentence of the second paragraph, strike the word **therefore** and capitalize **if**. In the first sentence of the fourth paragraph, change the word **facility** to **installation**. In the third sentence of the fourth paragraph, add the word **that** after the word **indicates**. In the fourth sentence of the fourth paragraph, change **would be through** to **is** and place a period after **MOA**. The fifth sentence of this paragraph should start with the word **Reasonable**, and the word **would** should be changed to **will**. The last sentence of the fourth paragraph should incorporate the suggested text from page 1-1.

12. **Page 2-7, Section 2.5.3, Second Bulleted Item.** The word **anthropogenic** should be changed to **man-made** in order to make the text less technical in nature.
13. **Page 2-8, Section 2.5.6.** The abbreviation **RBC** should be spelled out since this term is not included in the glossary.
14. **Page 2-8, Section 2.5.7.** The text should state that the groundwater remedy will be addressed in a separate, future ROD.
15. **Page 2-9, Section 2.6.1, Data Evaluation.** The word **medium** should be changed to **media**.
16. **Page 2-10, Table 2-2.** The word **medium** should be changed to **media**.
17. **Pages 2-12 and 2-13, Tables 2-3 and 2-4.** The HI values in each table should be aligned.
18. **Page 2-15.** A Section 2.6.3 should be added to include language from page 6-20 of the Guidance for Proposed Plans and RODs.
19. **Page 2-15, Section 2.8.** This section should list ALL nine criteria. In addition, the table listing the ARARs should be referenced and an explanation should be provided as to why the ARARs were chosen.
20. **Page 2-16, Table 2-6.** It should be indicated in the table that the costs provided are considered present day costs of implementing the remedy over a 30 year period and do not account for inflation or other factors. In addition, it is preferred that the capital costs be separated from O&M costs before calculating a present day worth.
21. **Page 2-17, Section 2.8.1.** The paragraph that describes Compliance With ARARs should provide a summary of how the three alternatives comply with ARARs.
22. **Page 2-19, Section 2.8.2, Cost.** The capital costs should be separated out from the O&M costs before summarizing the present day costs.
23. **Page 2-19, Section 2.10.** This section should be reworded to more closely reflect the Guidance for Proposed Plans and RODs. Suggested wording is as follows: "The alternative selected for implementation at Site 1 is consistent with the Navy's IR program, CERCLA and the NCP. The selected remedy is protective of human health and the environment. The selected remedy does not satisfy the statutory preference for treatment because it allows hazardous substances in concentrations above health based levels to remain onsite. However, the selected remedy does address the principal threat because it limits human exposure to contaminated soils through land use controls....."

24. **Page 2-20, Table 2-7.** In the Reduction of Toxicity, Mobility, and Volume section, the first sentence should be revised in order to clarify the statement. Suggested wording is as follows: “ This alternative would not provide a reduction in contaminant mobility or volume because no active mitigation of contaminants or reduction in volume is proposed.” In the Short Term Effectiveness section, the word **affected** should be changed to **protected** in the second sentence.
25. **Page 2-21, Table 2-8.** The last citation in the table should be changed. The name of the citation should be Resource Conservation and Recovery Act (RCRA) Regulations, Landban (40 CFR, Part 264, 268). The description should be to “Provide removal and disposal requirements for landfills that contain hazardous waste.” The consideration column for this citation should be revised to add the following to the end of the paragraph: “.....program and in the event soils are moved from the landfill.”
26. **Page A-1, Responsiveness Summary.** The response to the first comment should address surface flow to the drainage ditches.
27. **Page B-1, Land Use Control Implementation Plan.** The site description describes Site 1 as being 4-acres in size; however, previous site descriptions in the ROD, describe Site 1 as being 5-acres in size. This discrepancy should be addressed. In the Site Location section, change the word **facility** to **installation**. In the LUC Implemented to Achieve Objective(s) section, the first sentence should begin with **Will include a.....** What is meant by the *Station's* geographic information system should be more clearly defined in the text. The end of the first sentence should be amended as follows: “...**Site 1, and quarterly inspections.....**”
28. **Page B-2, Decision Documents.** Delete 1998 after *Protection* in the fourth document listed. In addition, capitalize the word **cleanup** in the seventh document listed.