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NAS WHITING FIELD
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LETTER REGARDING THE TRANSMITTAL OF THE U S NAVY RESPONSE TO U S EPA
REGION 4 COMMENTS ON DRAFT PROPOSED PLAN COMMENTS FOR SURFACE AND
SUBSURFACE SOIL FOR SITES 3, 4, 6, 30, 32 AND 33 NAS WHITING FIELD FL
7/27/2000
TETRA TECH



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0700-A130

July 27, 2000

Commander, Southern Division, Naval Facilities Engineering Command
Department of the Navy
SOUTHNAVFACENGCOM
ATTN: Ms. Linda Martin, Code 1859
Remedial Project Manager
2155 Eagle Drive
North Charleston, SC 29419

Subject: Response to EPA's Draft Proposed Plan Comments
For Surface and Subsurface Soil
Sites 3, 4, 6, 30, 32, and 33
NAS Whiting Field, Milton, Florida

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0028

Dear Ms. Martin:

Tetra Tech NUS, Inc. is pleased to submit responses to EPA's comments on the Draft Proposed Plans for Surface and Subsurface Soils at Sites 3, 4, 6, 30, 32, and 33, Naval Air Station Whiting Field in Milton, Florida.

Copies of the responses have been forwarded to the persons listed below on behalf of Southern Division, Naval Facilities Engineering Command for Naval Air Station Whiting Field.

Please call me at (865) 483-9900 if you have any questions or comments regarding this submittal.

Sincerely yours,

Phillip E. Ottinger
Task Order Manager

PEO:ckf

Enclosure

c: Mr. Rao Angara, Harding Lawson Associates (1 copy)
Mr. Craig Benedikt, USEPA (3 copy)
Mr. Jim Cason, FDEP (2 copies)
Mr. Terry Hansen, Tetra Tech NUS (1 copy)
Mr. Jim Holland, NAS Whiting Field (1 copy)
Ms. Amy Twitty, CH2M Hill (1 copy)
Mr. Gerry Walker, Tetra Tech NUS (1 copy)
Mr. Mark Perry (1 copy)
Ms. Debbie Wroblewski, Tetra Tech NUS (w/o enclosure)
File/Edb

**RESPONSE TO COMMENTS
EPA REVIEW COMMENTS
PROPOSED PLANS FOR
SITES 3, 4, 6, 30, 32 AND 33
NAS WHITING FIELD, DATED MAY 2000**

GENERAL COMMENTS

1. Page 1, Left Column, top of page. The text should state "In accordance with the NCP §300.430(f) as well as Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), this document summarizes.....".

Response:

The text will be revised as follows: "In accordance with the National Contingency Plan (NCP) §300.430(f) as well as Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), this document summarizes.....".

2. Page 1, The Proposal section, first paragraph. State that this is the proposed final remedy and identify the type of contamination being addressed. State more clearly that the unit consists of soils only. Indicate that groundwater is being handled as a separate and distinct unit. In the fifth sentence delete the words "quarterly and annual" and insert the word "periodic". In the sixth sentence, insert the word "separately" in between "investigated" and "as", capitalize the word "field", and provide the unit identification for the groundwater. The last sentence of this paragraph should be revised as follows: "The NAS Whiting Field Restoration Advisory Board (RAB) has provided input into the development of the proposed remedy."

Response:

The text will be revised as follows: (Site 3 is shown as example)

"The proposed final remedy for surface and subsurface soil contamination at Site 3 is a surface soil removal action and land-use controls (LUCs). Surface soil with the potential to impact human health would be removed with proper disposal off-site. Areas where soil is removed would be backfilled with clean soil. Areas covered with concrete or asphalt would not require soil removal because the existing cover material is a barrier preventing exposure to contaminated soil as long as the concrete/asphalt remains in place. LUCs would restrict future use of the site to activities involving less than full-time human contact with surface and subsurface soil such as commercial/industrial, limited agricultural, or recreational use. Residential use of the site would be prohibited, and the Navy would perform periodic site inspections and ensure the LUCs are being properly maintained and administered. Groundwater at Site 3 is being investigated separately as part of the NAS Whiting Field basewide groundwater study (Site 40) and is not addressed by the proposed remedy. There is no surface water or sediment at Site 3. This proposal was developed by the Navy with concurrence from the U.S. Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (FDEP). The NAS Whiting Field Restoration Advisory Board (RAB) has provided input into the development of the proposed remedy."

3. Page 1, The Proposal section, third paragraph or in the italicized preface statement in the first column. Provide an expanded explanation of the purpose of the Proposed Plan. The following is offered as an example: The proposed plan is a document intended to fulfill the public participation requirements under CERCLA and the NCP with the specific purposes as follows: provide basic background information; identify the preferred alternative for remedial action at the site and explain the reasons for the preference; describe other remedial alternatives that were considered before the proposed selection was made; solicit public review and comment on all alternatives described; and provide information on how the public can be involved in the remedy selection process.

Response:

The "italicized" text in the first column will be revised as requested.

4. Page 2, Regulatory Framework Section. Insert the word "the" in between "with" and "Comprehensive". In the last paragraph under Regulatory Framework, please state how the proposed plan complies with the NCP or delete this sentence in the paragraph.

Response:

The text will be revised as requested. The sentence referencing the NCP will be deleted.

5. Page 2, Investigation Findings. Delete the following sentence wherever it occurs in each proposed plan: "The Navy is currently performing a study to determine at what levels the arsenic occurs naturally at the site and to determine if the elevated levels are related to past waste disposal practices." In addition, the word "separately" should be inserted between the words "evaluated" and "in" in the last paragraph of the soil discussion.

Response:

The text will be revised as requested.

6. Environmental History, Feasibility Study Section. Please include a reference where a more detailed cost itemization can be found in the Administrative Record. All estimated costs should be identified as "estimated present worth costs". Additionally, state whether the costs include any operation and maintenance costs and if so, the time period over which operation and maintenance costs were calculated (for example, 15 years or 30 years). Add the following language to the end of the first full paragraph after the listing of the nine criteria : "Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare, or the environment." In the last paragraph of this section, the second sentence should be revised as follows: "The reporting and certification requirements for the LUCs have been incorporated into the LUC Memorandum of Agreement between

the Navy, U.S. EPA, and FDEP, dated {Insert the date of the final MOA}, and also will be specified in the Site {Insert appropriate site number}ROD.”

Response:

The first paragraph of the Feasibility Study section will be revised to add the suggested sentence:

“The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a more detailed description of the remedial alternatives evaluated and their estimated 30-year present worth operation and maintenance (O&M) and capital costs.”

The suggested sentence has been added to the end of the first full paragraph. The second sentence of the last paragraph has also been revised as suggested.

7. Page 3, Basis for the Proposal Section. In the second paragraph, insert the word “of” in between “instituting” and “LUCs” in the first sentence. In the second sentence, change the word “corrective” to “remedial”. The third sentence should be revised as follows: “Once the proposal is approved, the ROD will be signed by the Navy with concurrence by FDEP and USEPA.”

Response:

The text will be revised as “....institution of LUCs...”.

8. Public Involvement Section. The word “corrective” should be changed to “remedial” wherever it occurs in this section. In the third paragraph of this section, the second sentence should be revised as follows: “For example, the RAB has been invited to participate in developing the proposed remedy by reviewing the documents, offering suggestions, and expressing their concerns on the proposed remedial actions.” In the contact box, Mr. W. Logan Fink should be identified as the RAB Co-Chair to indicate why he is being listed as a contact for NAS Whiting Field.

Response:

The text will be revised as requested.

SITE 3 SPECIFIC COMMENTS

1. Page 1, Site History, Location. Insert the word “the” in between “of” and “Aircraft”.

Response:

The text will be revised as requested.

2. Page 2, first column, second paragraph. State what kind of contamination is associated with the underground waste tank located on the southwestern side of

Building 2941. This paragraph suggests that wastes other than waste oil were stored in the tank. Additionally, please define the term "hardstand" or use another reference.

Response:

The following sentence will be included in the paragraph, "The waste consisted of waste oil, PD-680 dry cleaning solvent, and waste Freon".

The word hardstand has been changed to aircraft apron.

3. Page 2, Site History, Current Conditions. Please indicate the approximate total acreage associated with Site 3.

Response:

The text will be revised to include the approximate acreage of the site – 2.5 acres.

4. Page 2, second column, Soil section under Investigation Findings. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan "fact sheet" format. The proposed sentences will be added to the first paragraph:

"In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection."

5. Page 2, second column, bulleted items. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown below estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible."

6. Page 3, first column, third full paragraph. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan "fact sheet" format:

"The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with the nine criteria."

7. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five years reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.

SITE 4 SPECIFIC COMMENTS

1. Page 3. Move the heading "Environmental History (continued from Page 2)" to the top of the page.

Response:

The text will be revised as requested.

2. Page 2, second column, Soil section under Investigation Findings. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation. Background soil determinations should be completed if the choice not to remediate is based on projected background conditions.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan "fact sheet" format. The proposed sentences will be added to the first paragraph:

"In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection."

3. Page 2, second column, bulleted items. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown below estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible."

4. Page 3, first column, first full paragraph after listing of nine criteria. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan "fact sheet" format:

"The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with the nine criteria."

5. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five year reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.

SITE 6 SPECIFIC COMMENTS

1. Page 2, second column, Soil section under Investigation Findings. Please include a more specific cite for the standards against which soil constituent concentrations were compared. Does this section include a listing of all of the hazardous substances detected in soil or only those which exceeded standards. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation. Background soil determinations should be completed if the choice not to remediate is based on projected background conditions.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan "fact sheet" format. The proposed sentences will be added to the first paragraph:

"In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection."

2. Page 2, second column. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown below estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible."

3. Page 3, first column, first full paragraph after listing of nine criteria. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan "fact sheet" format:

"The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with the nine criteria."

4. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five year reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.

SITE 30 SPECIFIC COMMENTS

1. Page 1, Site History, Location. Indicate approximate acreage of site.

Response:

The text will be revised as requested. The site is approximately 4.3 acres in size.

2. Page 2, second column, Soil section under Investigation Findings. Please include a more specific cite for the standards against which soil constituent concentrations were compared. Does this section include a listing of all of the hazardous substances detected in soil or only those which exceeded standards. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation. Background soil determinations should be completed if the choice not to remediate is based on projected background conditions.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan "fact sheet" format. The proposed sentences will be added to the first paragraph:

"In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection."

3. Page 2, second column. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown above estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible."

4. Page 3, first column, first full paragraph after listing of nine criteria. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan "fact sheet" format:

"The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with nine criteria."

5. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five year reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.

SITE 32 SPECIFIC COMMENTS

1. Page 1, Site History, Location. Indicate approximate acreage of site.

Response:

The text will be revised as requested. The site is approximately 3.5 acres in size.

2. Page 2, second column, Soil section under Investigation Findings. Please include a more specific cite for the standards against which soil constituent concentrations were compared. Does this section include a listing of all of the hazardous substances detected in soil or only those which exceeded standards. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation. Background soil determinations should be completed if the choice not to remediate is based on projected background conditions.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan "fact sheet" format. The proposed sentences will be added to the first paragraph:

"In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection."

3. Page 2, second column. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown above estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of

adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible.”

4. Page 3, first column, first full paragraph after listing of nine criteria. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan “fact sheet” format:

“The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with the nine criteria.”

5. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five year reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.

SITE 33 SPECIFIC COMMENTS

1. Page 1, Site History, Location. Indicate approximate acreage of site.

Response:

The text will be revised as requested. The site is approximately 2.5 acres in size.

2. Page 2, second column, Soil section under Investigation Findings. Please include a more specific cite for the standards against which soil constituent concentrations were compared. Does this section include a listing of all of the hazardous substances detected in soil or only those which exceeded standards. This section should include a listing of all hazardous substances detected in soil and an explanation as to why these other substances do not require remediation. Background soil determinations should be completed if the choice not to remediate is based on projected background conditions.

Response:

The RI will be referenced for a listing of hazardous substances due to the brief nature of the proposed plan “fact sheet” format. The proposed sentences will be added to the first paragraph:

“In the Remedial Investigation, all hazardous substances of potential concern detected in the soil are identified. The substances listed above are those driving the risk and requiring remedy selection.”

3. Page 2, second column. Please quantify the risk associated with the contamination and provide a basic explanation as to what the numbers mean.

Response:

The risks associated with receptors exceeding FDEP's or USEPA's incremental risk threshold will be quantified and the following explanation of what the numbers mean will be provided:

"For cancer-causing chemicals, the cancer risk numbers shown below estimate the number of additional persons at risk of developing cancer if the site is not cleaned up. For example, a cancer risk level of 1.0E-6 means one additional person out of a million persons is at risk of developing cancer. For noncancer-causing chemicals, the measure of the likelihood of adverse effects occurring in humans is called the Hazard Index (HI). An HI greater than 1.0 suggests that adverse effects are possible."

4. Page 3, first column, first full paragraph after listing of nine criteria. This section must contrast each proposed remedy using the nine individual criteria before reaching a conclusion. Please expand this section accordingly to address this comment.

Response:

The FS will be referenced for a detailed comparison of each alternative with the nine USEPA criteria due to the brief nature of the proposed plan "fact sheet" format:

"The Feasibility Study for Surface and Subsurface Soil, Sites 3, 4, 6, 30, 32, and 33 contains a detailed evaluation of each alternative with the nine criteria."

5. Page 3, second column, first paragraph. State that the Navy is proposing surface soil removal and LUCs as a final remedy with five year reviews since soil contamination will remain on site.

Response:

The text will be revised as requested.