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NAS WHITING FIELD  
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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON FINAL DRAFT  
RECORD OF DECISION FOR SITE 1 NAS WHITING FIELD FL  
9/21/1998  
U S EPA REGION IV

September 21, 1998

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: Final Draft ROD for Site 1

Dear Ms. Martin:

The United States Environmental Protection Agency (EPA) has received and reviewed the Final Draft Record of Decision (ROD) for Site 1, Northwest Disposal Area, at NAS Whiting Field, dated September 1998. The Agency's comments are as follows:

1. **Section 1.2, Page 1-1, Paragraph 2.** This paragraph should contain a detailed description of the land use controls to be implemented at the facility. (i.e. state that the land use controls will restrict land use to non-residential).
2. **Section 1.2, Page 1-1, Paragraph 3.** In lieu of providing an exact date of the MOA, it is suggested that the first sentence of this paragraph state that ABy separate Memorandum of Agreement (MOA) to be signed within 90 days of USEPA and FDEP concurrence on the ROD, NAS Whiting Field will agree to implement.....
3. **Section 1.2, Page 1-1, Paragraph 4.** Insert the word Aupon@ in between Aconcurred@ and Amay@ in the last sentence.
4. **Section 1.3, Page 1-1.** Additional information regarding the assessment of the site should be included in this section. For example, it may be relevant to state that no surface water or sediment exist onsite. In addition, a brief description of the risk posed by the site would be appropriate for this section.
5. **Section 1.4, Page 1-2, Paragraph 3.** In the first sentence of this paragraph, the text should state that the ROD only addresses surface and subsurface soil onsite and does not address groundwater. In addition, the second sentence should state that groundwater *has been* identified as a separate site.
- 1.
6. **Section 2.2, Page 2-1, Paragraph 1.** The As@ should be removed from the word Aaircraft@.
7. **Section 2.3, Page 2-1, Paragraph 1.** The second sentence should state that the documents are contained within the Administrative Record in the information repository located at West Florida Regional Library.

- 8. Section 2.4, Page 2-6, Paragraph 3.** The second sentence of this paragraph should state that the USEPA Region IV guidance requires the development of a land use controls assurance plan (LUCAP), which may be documented in a Memorandum of Agreement (MOA), as well as a site specific land use controls implementation plan (LUCIP).
- 9. Section 2.5, Page 2-6.** The text in this section should also state that there is no surface water or sediment at the site.
- 10. Section 2.5.1, Page 2-6.** This section should address whether the evaluation of the aerial photographs was successful in determining the history of landfilling activities at Site 1 or whether landfilling actually took place at Site 1.
- 11. Section 2.5.6, Page 2-7.** In the second sentence, analytes detected at Site 1 were compared to the Region III RBCs not the Region IV RBCs.
- 12. Section 2.9, Page 2-19.** This section should more clearly define the LUCs to be implemented as part of the selected remedy (limiting land use to non-residential).

The Agency=s comments must be satisfactorily addressed prior to receiving EPA concurrence on the ROD. If you should have any questions or comments, please contact me at (404) 562-8555.

Sincerely,

Craig A. Benedikt  
Remedial Project Manager  
Federal Facilities Branch

cc: Jim Cason, FDEP  
Jim Williams, Harding Lawson Associates  
Jim Holland, NAS Whiting Field