

**RECORD OF DECISION AMENDMENT
FOR
OPERABLE UNIT 2 - SITE 2, NORTHWEST
OPEN DISPOSAL AREA**

**NAVAL AIR STATION WHITING FIELD
MILTON, FLORIDA
USEPA ID No. FL2170023244**

**COMPREHENSIVE LONG-TERM
ENVIRONMENTAL ACTION NAVY (CLEAN) CONTRACT**

**Submitted to:
Naval Facilities Engineering Command
Southeast
Naval Air Station Jacksonville
Jacksonville, Florida 32212**

**Submitted by:
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**CONTRACT NO. N62467-94-D-0888
CONTRACT TASK ORDER 0369**

SEPTEMBER 2008

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CERTIFICATION OF TECHNICAL DATA CONFORMITY

The Contractor, Tetra Tech NUS, Inc., hereby certifies, to the best of its knowledge and belief, the technical data delivered herewith under Contract No. N62467-94-D-0888 are complete, accurate, and comply with all requirements of this contract. The work and professional opinions rendered in this report were conducted or developed in accordance with commonly accepted procedures consistent with applicable standards of practice.

DATE: 23 September 2008

NAME AND TITLE OF CERTIFYING OFFICIAL: Michael O. Jaynes, P.E.
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ACRONYMS

| | |
|--------|---|
| ABB-ES | ABB Environmental Services, Inc. |
| ARARs | applicable or relevant and appropriate requirements |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CG | Cleanup Goal |
| COC | Constituent of Concern |
| COPC | Constituent of Potential Concern |
| ERA | Ecological Risk Assessment |
| EE | Envirodyne Engineers, Inc. |
| ESD | explanation of significant differences |
| F.A.C. | Florida Administrative Code |
| FDEP | Florida Department of Environmental Protection |
| FS | Feasibility Study |
| G&M | Geraghty & Miller, Inc. |
| HHRA | Human Health Risk Assessment |
| HLA | Harding Lawson and Associates |
| IAS | Initial Assessment Study |
| ID | Identification |
| IR | Installation Restoration |
| LUC | Land Use Controls |
| LUCIP | Land Use Controls Implementation Plan |
| NA | No Action |
| N/A | Not Applicable |
| NAS | Naval Air Station |
| Navy | United States Navy |
| NCP | National Oil and Hazardous Substances Pollution Contingency Plan |
| NFA | No Further Action |
| NPL | National Priorities List |
| NPW | net present worth |
| OU | Operable Unit |
| O&M | Operation & Maintenance |
| RAOs | Remedial Action Objectives |
| RI | Remedial Investigation |
| ROD | Record of Decision |
| SARA | Superfund Amendments and Reauthorization Act |
| SCTL | Soil Cleanup Target Level |
| SVOCs | Semi Volatile Organic Compounds |
| TINUS | Tetra Tech, NUS, Inc. |
| USDA | United States Department of Agriculture |
| USEPA | United States Environmental Protection Agency |
| VOCs | Volatile Organic Compounds |

1.0 DECLARATION OF THE RECORD OF DECISION

1.1 SITE NAME AND LOCATION

Naval Air Station (NAS) Whiting Field (United States Environmental Protection Agency [USEPA] Identification Number FL2170023244) is located approximately 5.5 miles north of Milton, Florida, in Santa Rosa County, about 25 miles northeast of Pensacola. 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. The approximate location of Site 2 is shown on Figure 1-1.

1.2 STATEMENT OF BASIS AND PURPOSE

A Record of Decision (ROD) Amendment is needed for Site 2, Northwest Open Disposal Area, at NAS Whiting Field, Milton, Florida, in order to modify the ROD signed in September 1999 (HLA, 1999).

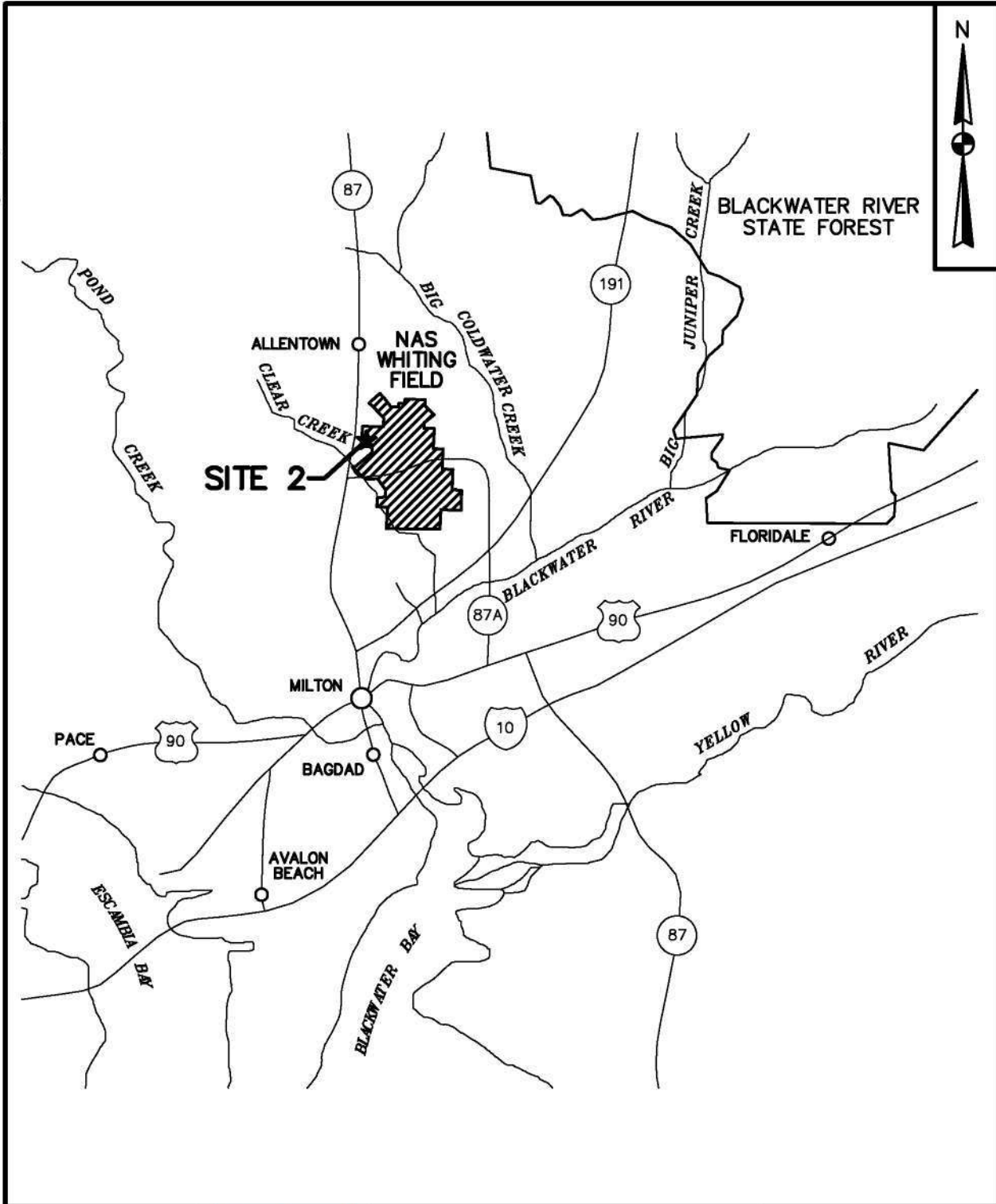
In the September 1999 ROD, a Land Use Controls (LUCs) remedy was selected to provide protection for human health and the environment against the lone constituent of concern (COC), arsenic. However, subsequent soil analysis at NAS Whiting Field indicates the presence of arsenic at elevated concentrations at Site 2 is naturally occurring (FDEP, 2001). A review of historical site activities at Site 2 does not support an anthropogenic source for arsenic at the site. Therefore, arsenic has been dropped as a COC for surface soil at Site 2.


This ROD Amendment is being prepared because the LUC remedy at Site 2 is no longer necessary. The changes are being proposed by the United States Navy (Navy), the lead agency, with approval from the USEPA, a support agency, and concurrence from the Florida Department of Environmental Protection (FDEP), a support agency.

Site 2 is one of numerous sites at NAS Whiting Field in the Installation Restoration (IR) Program under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as modified by the Superfund Amendments and Reauthorization Act (SARA). All requirements as outlined in CERCLA Section 117 and National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Section 300.435(c)(2)(I) have been met.

This ROD Amendment will be placed in the NAS Whiting Field Information Repository and will become a permanent part of the Administrative Record file. The file is available at the West Florida Regional Library, Milton Branch – 805 Alabama Street, Milton, Florida 32570.

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1.3 ASSESSMENT OF THE SITE

An Initial Assessment Study (IAS) was performed at NAS Whiting Field in 1985. Historical records indicated Site 2 was used as an open disposal area primarily for construction and demolition debris. Site 2 is currently a surface depression covered with dense, low-lying vegetation and some wood debris located in the center portion of the site. Although the IAS did not recommend Site 2 for additional investigation, the site was included in a Remedial Investigation (RI) conducted from 1992 through 1998. Results from the RI indicated a human health risk associated with exposure to arsenic in the soil due to an exceedance of the FDEP Soil Cleanup Target Level (SCTL) for arsenic. However, as discussed previously, subsequent soil analysis at NAS Whiting Field indicated that the presence of arsenic at elevated concentrations at Site 2 is consistent with background concentrations found elsewhere at the installation (FDEP, 2001). Therefore, 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.

1.4 DESCRIPTION OF THE SELECTED REMEDY

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). Since waste was left onsite, 5-year reviews were required to assess the protectiveness of the remedy. After the first 5-year review, and the finding that arsenic was naturally occurring and not the result of a CERCLA release, a no action (NA) remedy was selected.

1.5 STATUTORY DETERMINATIONS

No remedial action is necessary to ensure protection of human health and the environment. This ROD Amendment will become part of the Administrative Record File [NCP 300.825(a)(2)].


1.6 DATA CERTIFICATION CHECKLIST

The information required to be included in this ROD Amendment is summarized on Table 1-1. These data are presented in Section 2.0, Decision Summary, of this ROD Amendment. Additional information, if required, can be found in the NAS Whiting Field Administrative Record for Site 2.

TABLE 1-1
DATA CERTIFICATION CHECKLIST
OU 2- SITE 2 – NORTHWEST OPEN DISPOSAL AREA
RECORD OF DECISION AMENDMENT
NAVAL AIR STATION WHITING FIELD
MILTON, FLORIDA

| Information | ROD Reference |
|--|---------------------------|
| Constituents of Concern (COCs) | Not Applicable (N/A) |
| Baseline risk represented by the COCs | N/A |
| Cleanup Goals (CGs) established for the COCs. | N/A |
| Disposition of source materials constituting principal threat. | N/A |
| Current and reasonably anticipated future land use scenarios used for risk assessment. | Section 2.5.3 Page 2-7 |
| Potential land uses available at the site as a result of the selected remedy. | Section 2.7 Page 2-8 |
| Estimated capital, operation and maintenance (O&M), and net present worth (NPW) costs, discount rate used and timeframe these costs are projected for the selected remedy. | N/A |
| Key factors leading to the selection of the remedy. | Section 2.4 Pages 2-5 |

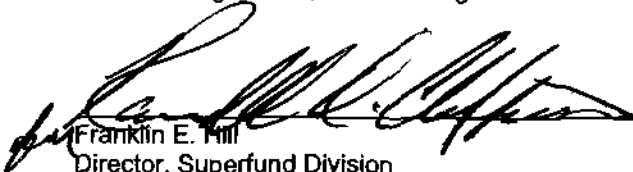
1.7 AUTHORIZING SIGNATURES



Enrique L. Sadsad
Captain, United States Navy
Commanding Officer, NAS Whiting Field

25 SEP 08

Date



Franklin E. Hill
Director, Superfund Division
USEPA, Region 4

10/8/2008

Date

2.0 DECISION SUMMARY

2.1 SITE NAME, LOCATION, AND DESCRIPTION

Site 2 (USEPA Identification (ID) No. FL2170023244), an old borrow pit, is a 12-acre parcel located along the northwestern facility boundary near the North Airfield. Currently, the site is characterized by a surface depression. At its lowest point, the bottom elevation of this surface depression is approximately 20 feet below the surrounding land surface. All surface drainage at the site is internal because of the steep side slopes of the borrow pit. Surface drainage within the borrow pit is down the partially vegetated side slopes to low areas near the middle of the pit where infiltration into the soil occurs. Access to the site is by a gate, located in the southwest corner of the site, from the perimeter road. The site contains wood debris, pallets, asphalt rubble piles, sheet metal, tires, furniture, and crushed paint cans.

The location and layout of Site 2 is presented on Figure 2-1.

According to the United States Department of Agriculture (USDA), the soil at Site 2 is classified as Troup Loamy Sand and Lakeland Sand. Because the soil at the site is predominantly silty sand, the on-site rainfall infiltrates directly into the soil.

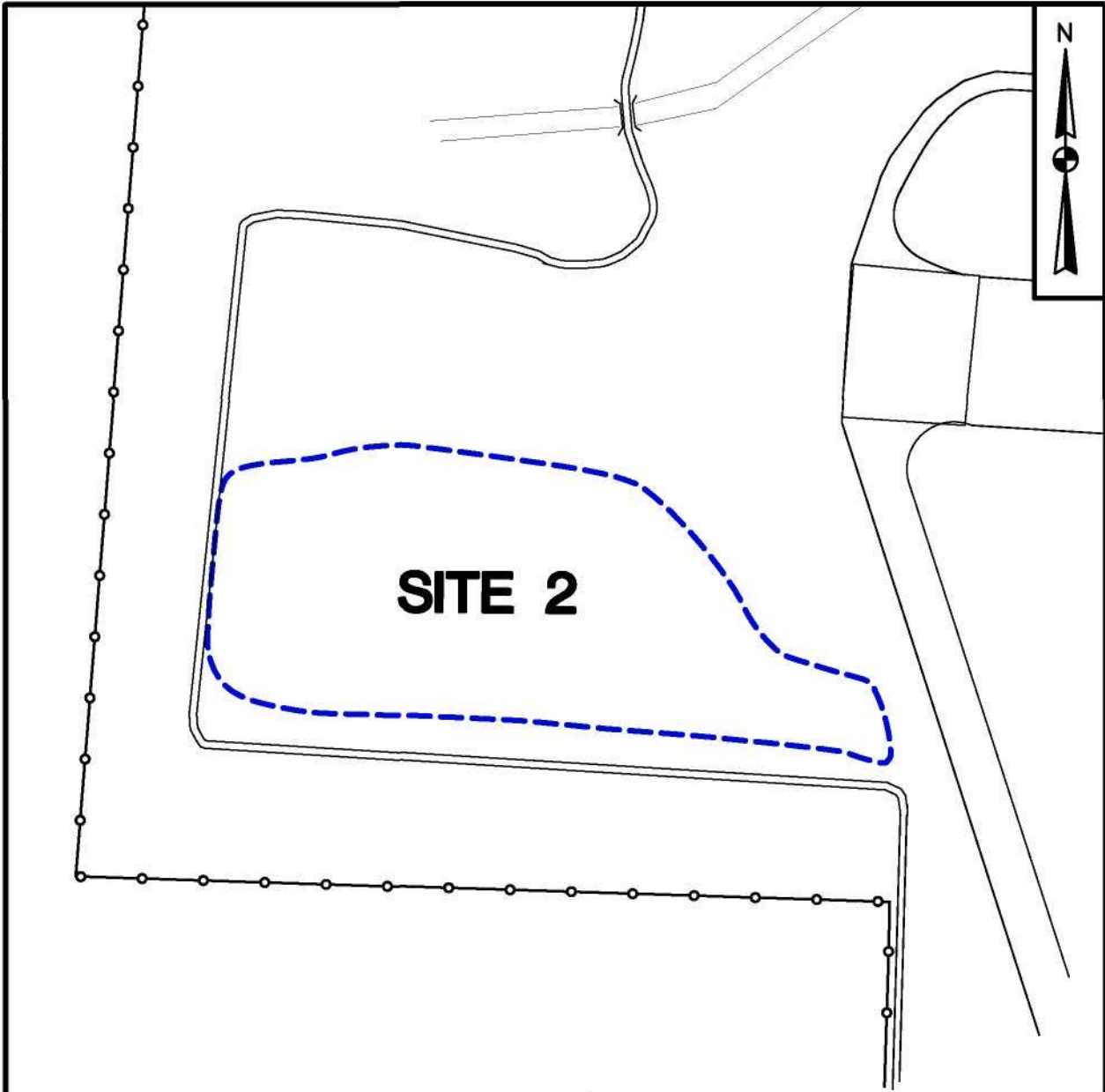
2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES

2.2.1 NAS Whiting Field History

NAS Whiting Field was placed on the National Priorities List (NPL) by the USEPA in June 1994. Following the listing of NAS Whiting Field on the NPL, remedial response activities have been conducted pursuant to CERCLA authority. The decision documents and remedy selection for NAS Whiting Field are developed by the Navy, the lead agency, and the USEPA, a support agency, with concurrence from FDEP, a support agency.

The first environmental studies for the investigations of waste handling and/or disposal sites at NAS Whiting Field were conducted during the IAS (Envirodyne Engineers, Inc. (EE), 1985). The record search indicated throughout its years of operation, NAS Whiting Field generated a variety of wastes related to pilot training, operation and maintenance of aircraft and ground support equipment, and facility maintenance programs.

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LEGEND:

- APPROXIMATE SITE BOUNDARY
- FENCE
- ROAD

0 100 200
GRAPHIC SCALE IN FEET

| | |
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**SITE 2 PLAN MAP
ROD AMENDMENT
NAS WHITING FIELD, MILTON, FLORIDA**

| | |
|----------------------------------|------------------|
| CONTRACT NO. 0006 | |
| OWNER NO. | |
| APPROVED BY | DATE |
| DRAWING NO. FIGURE 2-1 | REV. 0 |

NAS Whiting Field presently consists of two airfields (North and South Fields) and serves as a naval aviation training facility providing support facilities for flight and academic training. The current and anticipated future land use at Site 2 is recreational.

2.2.2 Site 2 History

First used in 1976, Site 2 was utilized for the disposal of construction and demolition debris during the period of 1976 until 1984. Since 1984, the site has been inactive.

The current land use for Site 2 is non-residential/recreational under the following conditions selected in the September 1999 ROD for Site 2:

1. The site may be utilized for activities involving less than full-time contact with the soil. This may include, but is not limited to, a) parks, b) recreation areas receiving heavy use (such as soccer or baseball fields), or c) agricultural sites where farming practices result in moderate site contact (approximately 100 days per year or less).
2. The Navy must ensure adherence to the land use by incorporating the site and restricted use conditions in a legally binding LUC agreement.
3. The soil cleanup goals shall not be utilized at any other site without specific FDEP approval.
4. The LUCs were based on the detection of arsenic in surface soil samples at concentrations exceeding residential and industrial SCTLs established as guidance criteria by Chapter 62-777, Florida Administrative Code (F.A.C.) (FDEP, 1999). Arsenic present at these concentrations could result in a total excess lifetime cancer risk of 2×10^{-5} by a hypothetical future resident, 2×10^{-6} for current and future site trespassers, and 3×10^{-6} by an occupational worker through the ingestion of surface soil. These risk levels exceed the FDEP target risk level of 1×10^{-6} .

2.2.3 Site Investigations

According to the IAS (EE, 1985), the site was used as an open disposal area primarily for construction and demolition debris from 1976 until 1984. Wastes disposed at the site include asphalt, wood, tires, furniture, and similar materials not suitable for landfill disposal. Crushed paint cans and scrap metal parts have been scattered throughout the site. Site 2 has undergone several phases of investigations since 1985, as described in Table 2-1 (HLA, 1998). Human health constituents of potential concern (COPCs) in surface soil include arsenic. Ecological COPCs in surface soil include chloroform, bis(2-ethylhexyl)phthalate, beryllium, and vanadium.

TABLE 2-1
SITE CHRONOLOGY OF EVENTS
OU 2- SITE 2 – NORTHWEST OPEN DISPOSAL AREA
RECORD OF DECISION AMENDMENT
NAVAL AIR STATION WHITING FIELD
MILTON, FLORIDA

| Event | Date |
|--|--------------------|
| Construction and demolition debris such as asphalt, wood, tires, furniture, and similar materials not suitable for landfill disposal were disposed of at the site. | 1976-1984 |
| Initial Assessment Study (IAS), Naval Air Station (NAS) Whiting Field, Milton, Florida [Envirodyne Engineers, Inc. (EE)] | 1985 |
| Remedial Investigation (RI) Report, Site 2, NAS Whiting Field, Milton, Florida [Harding Lawson and Associates (HLA), 1998] | 1992-1998 |
| Hazard Ranking Score generated for NAS Whiting Field, Milton, Florida | 1993 |
| NAS Whiting Field, Milton, Florida, Placed on National Priorities List (NPL) | May 31, 1994 |
| United States Environmental Protection Agency (USEPA) approves final version of RI Report for Site 2, NAS Whiting Field, Milton, Florida | 1998 |
| RI made available to the public | December 22, 1998 |
| Feasibility Study (FS) and Proposed Plan made available to public | January 5, 1999 |
| USEPA concurrence received on the implementation of Land Use Controls (LUCs) at Site 2, NAS Whiting Field, Milton, Florida | May 1999 |
| Final Record of Decision (ROD) selecting remedy is submitted | September 28, 1999 |
| Final ROD selecting remedy is accepted by USEPA | October 5, 1999 |
| Final ROD made available to public | October 11, 1999 |
| FDEP determines that arsenic is naturally occurring at Site 2, letter from Jim Cason dated April 11 | April 2001 |
| Initial Five-Year Review conducted | 2004 |
| ROD Amendment required to finalize change in selected remedy | 2008 |

2.3 PUBLIC PARTICIPATION COMPLIANCE

Public participation requirements as outlined in the NCP Section 300.435(c)(2)(ii) have been met. A Proposed Plan detailing the change in the selected remedy at Site 2 was made available to the public at the Santa Rosa County Library in Milton, Florida and a public comment period was conducted from August 15, 2008 through September 14, 2008.

2.4 SCOPE AND ROLE OF THE REMEDIAL ACTION SELECTED FOR SITE 2

The USEPA accepted the ROD for Site 2 on September 29, 1999. Remedial Action Objectives (RAOs) were developed as a result of data collected during the RI to aid in the development and screening of remedial alternatives to be considered for the ROD. The RAO for Site 2, to establish and maintain a LUC plan for Site 2, was developed because the use of the site-specific CG for arsenic required the implementation of LUCs.

The ROD presented the final action for both the surface and subsurface soils at Site 2 and was based on results of the RI and Feasibility Study (FS) completed for surface and subsurface soils for Site 2. The selected alternative at Site 2 was LUCs and included 5-year site reviews to evaluate the effectiveness of the LUCs. The LUCs established controls for limiting land use at the site to nonresidential use as specified in the Land Use Controls Implementation Plan (LUCIP). These controls were incorporated into a Memorandum of Agreement. The 5-year site reviews verify that the selected alternative is protective of human health and the environment in future years. LUCs were selected to address principal threats and risks identified for Site 2. The implementation of LUCs addressed current and future risks associated with contaminants present at Site 2 at that time. However, as discussed previously, subsequent soil analysis at NAS Whiting Field indicated that the presence of arsenic at elevated concentrations at Site 2 is consistent with background concentrations found elsewhere at the installation (FDEP, 2001). A review of historical site activities at Site 2 does not support a source for arsenic at the site and subsequently, the arsenic has been dropped as a COC for surface soil at Site 2.

As stated above, this ROD Amendment only addresses surface and subsurface soils at Site 2. Consequently, the ROD did not, and this ROD Amendment does not address actual or potential groundwater contamination at the site. Groundwater has been identified as a separate site (Site 40) and will be addressed in a future RI/FS.

2.5 SITE CHARACTERISTICS

Site 2 is approximately 12 acres in size and is located along the northwestern facility boundary near the North Airfield. Currently, the site is characterized by a surface depression. At its lowest point, the bottom elevation of this surface depression is approximately 20 feet below the surrounding land surface. All surface drainage at the site is internal because of the steep side slopes of the borrow pit. Surface drainage within the borrow pit is down the partially vegetated side slopes to low areas near the middle of the pit where infiltration into the soil occurs. Access to the site is by a gate, located in the southwest corner of the site, from the perimeter road. The site contains wood debris, pallets, asphalt rubble piles, sheet metal, tires, furniture, and crushed paint cans. Buried wastes are not exposed at the land surface in erosional areas, nor are there indications (e.g., stained soil or stressed vegetation) of other past hazardous waste disposal practices. The perimeter area of the site is currently forested with pine trees, approximately 25 to 40 feet in height.

2.5.1 Nature and Extent of Contamination

During the RI, background samples were collected at NAS Whiting Field to determine the background or naturally-occurring concentrations of inorganics in the soil. Concentrations of inorganics detected in soil samples at Site 2 were compared to the background soil inorganic concentrations to determine if the inorganic levels detected in the Site 2 samples were the result of site-related activities or naturally-occurring conditions. Arsenic concentrations detected in the soil at Site 2 were elevated above the background concentrations suggesting the elevated levels of arsenic were due to site activities. As a result of the elevated concentrations of arsenic in the soil, a LUC was implemented to provide for human health protection.

However, subsequent investigations at NAS Whiting Field indicate the presence of arsenic in the soil at elevated concentrations at Site 2 to be naturally occurring (FDEP, 2001). Past site activities do not support an anthropogenic source for arsenic at Site 2. Based on these findings, the LUC remedy at Site 2 is being removed in this ROD Amendment.

2.5.1.1 Surface Soil

Surface soil sampling was conducted at Site 2 to determine the nature and extent of contamination at the site and to assess whether or not surface soil could potentially serve as an exposure pathway to human or ecological receptors. Constituents detected in surface soil at Site 2 included one volatile organic compound (VOC), three semi volatile organic compounds (SVOCs), and 20 inorganic compounds. As a result of the removal of arsenic as a site-related contaminant, no COCs were identified in surface soil and no human health risks were identified for exposure to surface soil at Site 2.

A complete list of all constituents sampled and their detected concentrations in surface soil is available in the RI report (HLA, 1998).

2.5.1.2 Subsurface Soil

No COCs were identified, and no human health risks were identified following the risk assessment for exposure to subsurface soils at Site 2.

2.5.2 Ecological Habitat

Site 2 is limited in the quantity and quality of habitat for ecological receptors. Most importantly, the site comprises only a small portion of the home ranges of most wildlife, and the limited size and habitat of the site serves to restrict the amount of food available to upper trophic level organisms.

As a result of the removal of arsenic as a COC, no ecological risk was identified for exposure to surface and subsurface soils at Site 2.

2.5.3 Current and Potential Future Land Use

The current and anticipated future land use at Site 2 is non-residential/recreational.

2.6 SUMMARY OF SITE RISKS

The human health risk assessment (HHRA) and the ecological risk assessment (ERA) performed as part of the RI, provided the basis for selecting the initial remedial action for Site 2. As discussed previously, although arsenic is present at Site 2, because the presence of arsenic is naturally occurring and not the result of a CERCLA release, there are no longer any unacceptable human health risks in the surface and/or subsurface soil at Site 2 under a residential land use scenario. Therefore, no response action will be taken at Site 2.

2.7 DOCUMENTATION OF SIGNIFICANT CHANGES

The changes that have occurred at Site 2 have previously been documented and described in this ROD Amendment. A summary is provided below:

Based upon the consideration of the requirements of CERCLA, the NCP, and the regulatory changes at Site 2, a No Action (NA) remedy has been selected to replace the existing LUC remedy for surface and subsurface soils at Site 2.

LUCs were selected to address principal threats and risks identified for Site 2. Implementing LUCs addressed current and future risks associated with contaminants present at Site 2 at that time. However, as discussed previously, subsequent soil analysis at NAS Whiting Field indicated the presence of arsenic at elevated concentrations at Site 2 is consistent with background concentrations found elsewhere at the installation (FDEP, 2001). A review of historical site activities at Site 2 does not support a source for arsenic at the site and subsequently, the arsenic has been dropped as a COC for surface soil at Site 2.

This remedy was selected for the following reasons:

- There is no longer an unacceptable threat to human health or the environment under an unrestricted land use scenario at Site 2.
- No unacceptable ecological risks were identified.

No remedial action is required at Site 2 based on recent regulatory changes in screening levels and the determination that arsenic is naturally occurring. Therefore, no additional remedial activities will take place at Site 2. The NA remedy extends to the boundaries of Site 2. The NA remedy is for surface and subsurface soils only.

The NA remedy will be protective of human health and the environment immediately upon approval of this ROD Amendment. Site 2 will be available for unrestricted use and unlimited exposure.

REFERENCES

Envirodyne Engineers, Inc. (EE), 1985. *Initial Assessment Study, NAS Whiting Field, Milton, Florida*. Final Report. Prepared for Naval Energy and Environmental Support Activity, Port Hueneme, California. May.

Florida Department of Environmental Protection (FDEP), 1999. *Technical Report for the Development of Soil Cleanup Target Levels*, Chapter 62-777,F.A.C., Final Report. May 26.

FDEP, 2001. Letter from James Cason, FDEP, to James Holland, NAS Whiting Field. *Analysis of Soil for Arsenic at Outlying Landing Fields*. April 11.

Geraghty & Miller, Inc. (G&M), 1986. *Verification Study, Assessment of Potential Groundwater Pollution at NAS Whiting Field, Milton, Florida*. Final Report. Prepared for Southern Division Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), North Charleston, South Carolina.

Harding Lawson Associates (HLA), 1998. *Remedial Investigation Report for Site 2, Northwest Open Disposal Area, Naval Air Station Whiting Field, Milton, Florida*. Prepared for SOUTHNAVFACENGCOM, North Charleston, South Carolina. December.

HLA, 1999. Record of Decision for Site 2, Northwest Open Disposal Area, Surface and Subsurface Soil, Naval Air Station Whiting Field, Milton, Florida. Prepared for SOUTHNAVFACENGCOM, North Charleston, South Carolina. September.

TINUS (Tetra Tech NUS), 2008. *Proposed Plan for Site 2, Northwest Open Disposal Area, Naval Air Station Whiting Field, Milton, Florida*. Prepared for NAVFAC Southeast, North Charleston, South Carolina. April.