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NAS CECIL FIELD, FL  
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LETTER REGARDING U S EPA REGION IV REVIEW OF FINAL SECOND FIVE YEAR  
REVIEW WITH ATTACHMENTS NAS CECIL FIELD FL  
9/22/2005  
U S EPA REGION IV



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

~~September~~ **September 22, 2005**

4WD-FFB

Commander  
NAVFAC EFD SOUTH  
Attn: Joe McCauley, Code ES00  
P.O. Box 190010  
North Charleston, SC 29419-9010

SUBJ: ~~Second~~ **Five-Year Review, September 2005**  
Naval Air Station Cecil Field

Dear Mr. McCauley:

The Environmental Protection Agency (EPA) has reviewed the subject document and determined that it meets all requirements of the *Comprehensive Five-Year Review Guidance*, EPA 540-R-007; OSWER No. 9355.7-03B-P. June 2001. Please note that an EPA Region IV representative was not present when the on-site review was conducted so EPA's approval is based on the information contained in the subject document along with personal information EPA representatives obtained during ongoing oversight of work at the former Naval Air Station Cecil Field through periodic progress reports, site visits, and meetings. A summary of the Second Five-Year Review as contained in the subject report follows.

Former Naval Air Station Cecil Field originally encompassed 17, 200 acres. At Naval Air Station Cecil Field, certain site-specific or zone-wide Operable Unit (OU) remedial actions are being performed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires that all remedies selected under CERCLA §121, which result in hazardous substances, pollutants, or contaminants remaining at the site, be subject to a Five-Year Review. Executive Order 12580 delegated CERCLA remedial responsibilities, including Five-Year Reviews, to the Secretary of Defense, with respect to releases from any facility or vessel under the jurisdiction, custody, or control of the Department of Defense. At Naval Air Station Cecil Field, certain remedial actions are being performed in accordance with CERCLA that require Five-Year Reviews to verify that previously implemented remedies remain protective of human health and the environment.

The majority of the flightline was transferred to the Jacksonville Airport Authority (JAA) in August 1999, and the majority of the City of Jacksonville Economic Development Conveyance (EDC) Parcel was transferred in May 2000. The Navy retained ownership of

property in both parcels associated with OUs that do not have unrestricted reuse. The OUs still owned by the Navy will be transferred when it has been determined that the remediation systems are operating properly and successfully (OPS) or when cleanup levels are achieved resulting in unlimited use.

This Five-Year Review for 2005 constitutes the second required review/reporting cycle for Naval Air Station Cecil Field. The triggering action for the statutory and policy review was the date of the OU 7, Site 16, Interim Record Of Decision (IROD) and Interim Removal Action (IRA), March 1994, as shown in the U.S. EPA's WasteLAN database. A summary of the sites and OUs covered in this report is as follows:

- 1) OU 1, Sites 1 and 2
- 2) OU 2, Sites 5 and 17
- 3) OU 3, Sites 7 and 8
- 4) OU 4, Site 10
- 5) OU 6, Site 11
- 6) OU 7, Site 16
- 7) OU 8, Site 3
- 8) OU 9, Sites 36 and 37
- 9) OU 11, Site 45

This Five-Year Review did not include OU 5, Sites 14, 15, and 49; OU 9, Sites 57, 58, and 59; OU 10, Sites 21 and 25; and OU 12, Sites 32, 42, and 44, and the Old Golf Course. OU 5, Site 14; and OU 12, Sites 42, 4; and Old Golf Course were not included because Five-Year Reviews are not required when the selected remedial action in the ROD is No Further Action and there have been no changes in the site conditions and the factors contributing to the assumptions underlying the No Further Action decision. OU 5, Sites 15 and 49; and OU 9, Site 59 were not included because these sites are being investigated, no ROD has been prepared that identifies the selected remedial action, and no remedial actions have been conducted at these sites. Investigations are complete at OU 9, Sites 57 and 58; OU 10, Sites 21 and 25; and OU 12, Site 32, but RODs were not finalized before June 30, 2004.

Final amended RODs have been approved for OU 2, Site 5; and OU 7, Site 16. A Remedial Investigation (RI), Baseline Risk Assessment (BRA), and Feasibility Study (FS), have been completed for OU 5, Site 15; however, the FS is being re-evaluated, and the Proposed Plan and subsequent ROD are pending. Investigations are ongoing at OU 5, Site 49. RI and FS Reports have been finalized for OU 9, Sites 57 and 58; and OU 10, Sites 21 and 25, and an Engineering Evaluation/Cost Analysis (EE/CA) was finalized for OU 12, Site 32, but RODs were not issued for these sites before June 30, 2004.

The OU Records of Decision (RODs) identified in remedial action objectives (RAOs), which defined the scope and purpose of the cleanup, action required to address the potential threats to human health and the environment. After remedial action has been implemented, the

RAOs continue to serve as a metric against which the monitoring and performance data are measured. Overall the remedial actions and remedial systems at Naval Air Station Cecil Field are successfully meeting the OU RAOs and are achieving their principal performance goals of removing contamination from the source areas.

Where cleanup goals are presented in the RODs, the applicable and appropriate requirements (ARARs) identified remain current. Additionally, no new state or federal laws have been enacted which may call into question the selection and protectiveness of the implemented remedies.

On October 3, 2000, EPA concurred on the First Five-Year Review. On September 19, 2005, J. L. McCauley signed the Second Five-Year Review affirming (certifying) on behalf of the Navy that the remedies for the sites addressed in this report remain protective of human health and the environment. The remedies also comply with the ARARs and are reasonably cost-effective. EPA concurs with the Navy's protectiveness determinations that the remedies remain protective of human health and the environment, consistent with EPA's statutory and regulatory authorities. Those remedies that rely on some form of treatment are reducing the toxicity, mobility, and/or volume of hazardous substances at those sites. It is expected that the remedial activities and Land Use Controls/Institutional Controls (LUCs/ICs) at Naval Air Station Cecil Field will permanently reduce the risks to human health and environment by eliminating, reducing, or controlling exposures to human and environmental receptors through engineering and institutional controls. Furthermore, there are no known areas of noncompliance.

In October 2003, an ESD was finalized for multiple sites that modified their RODs to support implementation of these LUCs by providing specific LUC provisions as an enforceable part of the ROD.

General conclusions and recommendations for the next Five-Year Review at Naval Air Station Cecil Field include:

- 1) The remedial actions at the OUs at NAS Cecil Field are expected to be protective of human health and the environment. Remedial actions for immediate threats of exposure have been completed (OU 2, Sites 5 and 17; OU 3, Sites 7 and 8; OU 4, Site 10; OU 6, Site 11; OU 7, Site 16; OU 9, Sites 36 and 37; and OU 11, Site 45). However, many of the remedial actions currently being implemented will require more than five (5) years to complete. The implementation of the long-term groundwater monitoring programs for most of the OUs provides a degree of protection of human health and the environment. Implementation of the LUCs will also provide a significant degree of protectiveness of human health and the environment until completion of the remedy is achieved to provide full protectiveness. Upon completion of the ongoing remedial actions (monitoring and operation of the Air Sparging and Air Sparging/Soil Vapor Extraction Systems), the remedies are expected to be protective of human health and the environment.

This Five-Year Review shows that the Navy is meeting or exceeding the requirements of the RODs for the OUs at Naval Air Station Cecil Field and is constantly re-evaluating to utilize permanent remedies and alternative treatment technologies and to optimize monitoring programs to the maximum extent practical for each OU.

- 2) Five-Year Reviews are required by statute or as a matter of policy, depending on the RAOs and remedial actions defined in the ROD. Naval Air Station Cecil Field has OUs that require statutory or policy Five-Year Reviews. This report represents the Second Five-Year Review conducted at Naval Air Station Cecil Field. The next Five-Year Review will be required within five (5) years of the signature date of this letter, in 2010.

The Five-Year Review should include a detailed review of the costs for implementing the remedial actions to confirm that the remedy is proceeding as planned. The review should also include a detailed review of sampling activities at OU 9, Sites 36 and 37; and OU 11, Site 45, because the groundwater sampling activities reviewed for this report have occurred for less than five (5) years. The implementation of LUCs had not been completed at the time of this review; therefore, a review of the final LUCs are defined in the LUC RDs will also be required.

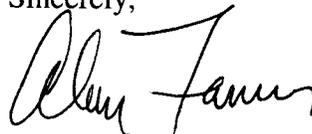
- 3) OU 1, Sites 1 and 2 will require a statutory review during the next Five-Year Review for NAS Cecil Field. Five-Year Reviews will continue at OU 1, Sites 1 and 2 because hazardous substances, pollutants, and contaminants remain at this site that will not allow for unlimited use or unrestricted exposure.
- 4) OU 2, Sites 5 and 17; OU 3, Site 8; OU 7, Site 16; OU 8, Site 3; OU 9, Sites 36 and 37; and OU 11; Site 45 will require ongoing policy Five-Year Reviews until cleanup levels are achieved, resulting in unlimited use and unrestricted exposure. Hazardous substances, pollutants or contaminants currently remain at these sites that will not allow unlimited use or unrestricted exposure.

OU 4, Site 10 will not be included in the next review because the remedy in the ROD and ESD is No Further Action after completion of the Interim Remedial Action; therefore, no additional Five-Year Review will be required. OU 3, Site 7; and OU 6, Site 11 will also not be included in the next Five-Year Review because No Further Action is required at these sites based on completion of the groundwater monitoring programs.

- 5) OU 5, Sites 15 and 49; OU 9, Sites 57, 58, and 59; OU 10, sites 21 and 25; and OU 12, Site 32 were not included in this Five-Year Review because the RODs that identify the selected remedial actions were not completed at the time of the review. It is anticipated that the RODs for these sites will be completed and that the remedial actions will be in process at the time of the next review; therefore, the next Five-Year Review will include these sites.

Based on the information provided in the subject document, EPA approves the subject document. If you have any questions, please call me at (404) 562-8651, or Doyle T. Brittain at (404) 562-8549.

Sincerely,

A handwritten signature in black ink that reads "Alan Farmer". The signature is written in a cursive style with a large initial "A" and a long horizontal stroke extending to the right.

Alan Farmer  
Acting Division Director  
Waste Management Division

cc: Mark Davidson, NASCF  
David Grabka, FDEP

## Five-Year Review Summary Form, cont'd.

### Issues:

No deficiencies were discovered during the five-year review. The Navy still owns the properties that have contaminant concentrations greater than action levels. All remedial actions for the sites reviewed have been implemented.

### Recommendations and Follow-up Actions:

Implementation of land use controls (LUCs) and continuation of long-term monitoring are required at OU 1, Sites 1 and 2; OU 2, Sites 5 and 17; OU 3, Site 8; OU 7, Site 16; OU 8, Site 3; OU 9, Sites 36 and 37; and OU 11, Site 45. LUCs will be implemented upon finalization of the LUC Remedial Designs (RDs) and must be adopted upon property transfer by the City of Jacksonville, Jacksonville Airport Authority (JAA), and any subsequent owners until remedial actions achieve cleanup levels that result in unlimited use and unrestricted exposure. Continued evaluation/operation of air sparging (AS) or AS/vapor extraction (VE) systems is required at OU 7, Site 16; OU 8, Site 3; and OU 9, Sites 36 and 37.

No further action has been approved for OU 4, Site 10; OU 3, Site 7; and OU 6, Site 11.

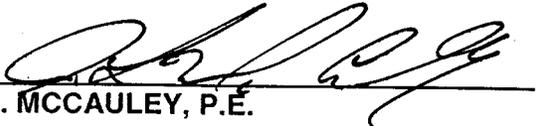
### Protectiveness Statement(s):

The remedial actions (long-term groundwater monitoring and operation of AS and AS/VE systems) at NAS Cecil Field OUs will be protective of human health and the environment upon completion. Remedial actions for immediate threats of exposure due to contaminated soil have been implemented (OU 2, Sites 5 and 17; OU 3, Sites 7 and 8; OU 4, Site 10; OU 6, Site 11; OU 7, Site 16; OU 9, Sites 36 and 37; and OU 11, Site 45). However, many of the groundwater remedial actions currently being implemented will require more than 5 years to complete.

This five-year review shows that the Navy is meeting or exceeding the requirements of the RODs for the OUs at NAS Cecil Field. The Navy is constantly re-evaluating to utilize permanent remedies and alternative treatment technologies to the maximum extent practical for each OU.

### Other Comments:

The majority of the flightline was transferred to the JAA in August 1999, and the majority of the City of Jacksonville Economic Development Conveyance (EDC) Parcel was transferred in May 2000. The Navy retained ownership of property in both parcels associated with OUs that do not have unrestricted reuse. The OUs still owned by the Navy will be transferred when it has been determined that the remedial actions are operating properly and successfully (OPS), when cleanup levels are achieved allowing for unlimited use, or when early transfer is approved.

  
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J.L. MCCAULEY, P.E.  
Director  
Environmental Services  
NAVFAC EFD SOUTH

Date

9/19/05

## Five-Year Review Summary Form

SITE IDENTIFICATION		
Site name (from WasteLAN): Naval Air Station Cecil Field		
EPA ID (from WasteLAN): FL5170022474		
Region: 4	State: FL	City/County: Jacksonville/Duval and Clay
SITE STATUS		
NPL status: <input checked="" type="checkbox"/> Final <input type="checkbox"/> Deleted <input type="checkbox"/> Other (specify)		
Remediation status (choose all that apply): <input checked="" type="checkbox"/> Under Construction <input checked="" type="checkbox"/> Operating <input checked="" type="checkbox"/> Complete		
Multiple OUs? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Construction completion date: TBD	
Has site been put into reuse? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
REVIEW STATUS		
Lead agency: <input type="checkbox"/> EPA <input type="checkbox"/> State <input type="checkbox"/> Tribe <input checked="" type="checkbox"/> Other Federal Agency -- United States Navy		
Author name: Mark Davidson		
Author title: Remedial Project Manager	Author affiliation: Naval Facilities Engineering Command, Engineering Field Division South	
Review period**: 7 / 1 / 1999 to 6 / 30 / 2004		
Date(s) of site inspection: 6 / 2004		
Type of review: <div style="text-align: right; margin-top: 5px;"> <input checked="" type="checkbox"/> Post-SARA    <input type="checkbox"/> Pre-SARA    <input type="checkbox"/> NPL-Removal only  <input type="checkbox"/> Non-NPL Remedial Action Site    <input type="checkbox"/> NPL State/Tribe-lead  <input type="checkbox"/> Regional Discretion         </div>		
Review number: <input type="checkbox"/> 1 (first) <input checked="" type="checkbox"/> 2 (second) <input type="checkbox"/> 3 (third) <input type="checkbox"/> Other (specify) _____		
Triggering action: <input type="checkbox"/> Actual RA Onsite Construction at OU # _____ <input type="checkbox"/> Actual RA Start at OU# _____ <input type="checkbox"/> Construction Completion <input type="checkbox"/> Previous Five-Year Review Report <input checked="" type="checkbox"/> Other (specify) Interim ROD signature for OU 7, Site 16		
Triggering action date (from WasteLAN): 6 / 2 / 1994		
Due date (five years after triggering action date): 10 / 02 / 2005***		

\* ["OU" refers to operable unit.]

\*\* [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

\*\*\* Five years after U.S. EPA approval of the first Five-Year Review Report.