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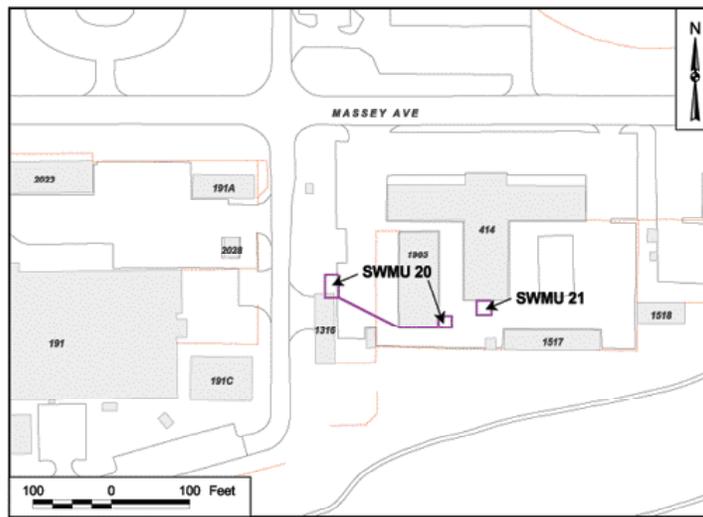
STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 20 AND SOLID WASTE
MANAGEMENT UNIT 21 NS MAYPORT FL
4/14/2014
TETRA TECH

STATEMENT OF BASIS
Solid Waste Management Units 20 and 21
Naval Station Mayport
Jacksonville, Florida



USEPA ID #FL9 170 024 260

April 14, 2014



Facility/Unit Type: Naval Station
Contaminants: No Contaminants Exceeding Florida Cleanup Target Levels
Media: Soil and Groundwater
Corrective Action: Soil and Groundwater – No Action

SUMMARY

The proposed corrective action for **Solid Waste Management Units (SWMUs) 20 and 21** at Naval Station (NAVSTA) Mayport is **No Action** for **surface soil, subsurface soil, and groundwater**. Oily stains had been observed on the surface soil in the vicinity of SWMUs 20 and 21 during the **Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)** in 1989. Sample results collected during the RFA Visual Site Inspection (VSI) for the Group III **RCRA Facility Investigation (RFI)** have shown that surface and subsurface soil contamination is not of concern for SWMUs 20 and 21. Also, groundwater sample results associated with the RFA/VSI have shown that groundwater contamination is not of concern for SWMUs 20 and 21. No surface water exists at SWMUs 20 and 21.

The public is invited to comment on this proposed corrective action or any other **corrective measure** alternative including those not previously studied. Information on how the public may participate in this decision making process is provided in the Public Participation section of this document.

INTRODUCTION

Pursuant to RCRA, as amended by the 1984 **Hazardous and Solid Waste Amendments (HSWA)**, the **Florida Department of Environmental Protection (FDEP)** issued the renewed HSWA permit to NAVSTA Mayport on August 17, 2009.

This **Statement of Basis (SB)** identifies the proposed corrective action for SWMUs 20 and 21, explains why the selected corrective action was chosen, solicits public review and comment on this decision, and provides information regarding how the public can be involved in the corrective action selection process. Additional details regarding the facility, environmental investigations, and the evaluation of the corrective measure alternatives may be found in the RFA/VSI and **Corrective Measures Study (CMS)**. These documents are kept as part of the Administrative Record at the **Information Repository**. Refer to the Public Participation section of this document for their location. A glossary, which defines some of the technical terms contained herein, is included at the end of this document.

The corrective measures reflected in this SB are those proposed by the United State Navy and the FDEP for implementation at SWMUs 20 and 21. Changes to the proposed corrective action or a change from the proposed corrective action to another appropriate solution will require public participation as described in this document.

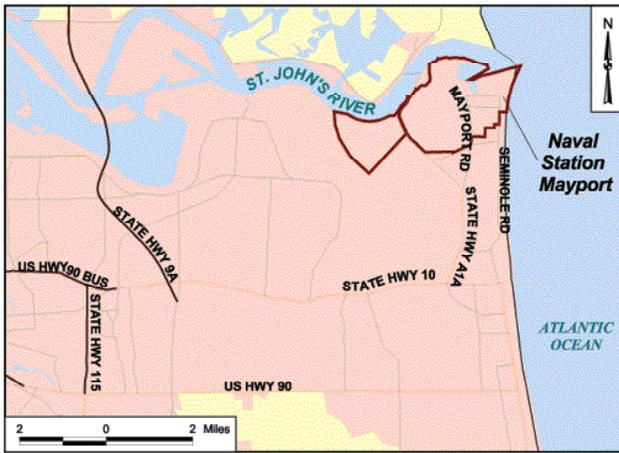
PROPOSED CORRECTIVE ACTION

The proposed corrective action for surface soil, subsurface soil, and groundwater at SWMUs 20 and 21, NAVSTA Mayport is No Action.

FACILITY BACKGROUND

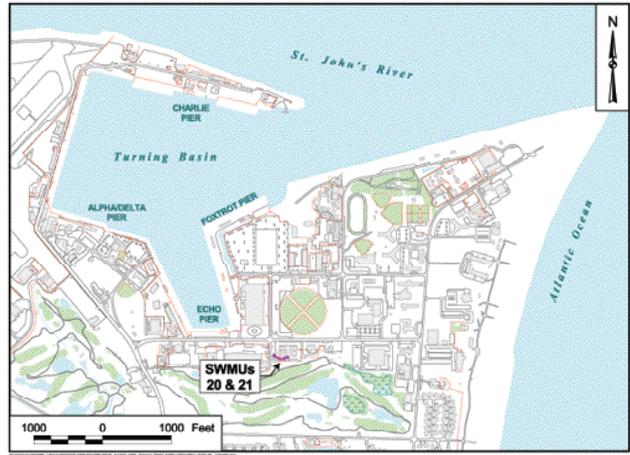
NAVSTA Mayport is located near the town of Mayport within the city limits of Jacksonville, Florida, in northeastern Duval County on the southern shore of the confluence of the St. Johns River and the Atlantic Ocean (see Figure 1). SWMUs 20 and 21, the Hobby Shop Drain and the Hobby Shop Scrap Storage Area, respectively, are located around Building 414 in the southeastern portion of NAVSTA Mayport near the Mayport Turning Basin (see Figure 2).

Figure 1. Naval Station Mayport Location Map



SWMU 20, the Hobby Shop Drain, is located at the southeastern corner of Building 1965 (formerly Building 1277A). The drain was located on the soil adjacent to a sloped concrete apron leading to the raised concrete floor of Building 1965, according to the RFA conducted by A. T. Kearney, Inc. in 1989. The drain inlet was covered with the screen that was connected to an underground pipe, which in turn was connected to an outlet on the western side of Building 1965. The soil in the area of the drain inlet and along the edge of the concrete apron was stained and oily as noted in the RFA. Stains were also noticed from the outlet of the drain pipe, across the parking lot, and towards a storm drainage ditch that runs parallel to Massey Avenue on the southern side of the roadway. Dark oily sediments were also observed in the drainage ditch, and an oily

Figure 2. SWMU Location Map



sheen was also noted at the point where the water in the drainage ditch entered a drain pipe.

SWMU 21, the Hobby Shop Scrap Storage Area, is approximately 20 square feet, is located adjacent to the southern side of the eastern wing of Building 414, and is surrounded by fencing with an entrance gate on the southern side. The area was underlain by old, pitted asphalt, and no berms or containment structures were present as noted in the RFA. The facility contained scrap metal, engine parts, open gas cylinders and a Freon 22™ container, an automotive battery, old appliances, and other scrap metal items that were ultimately collected by the Defense Reutilization and Marketing Office for resale. Several of the engine parts were observed to be oily, and the base of the area was observed to be heavily stained by dark oily materials.

Limited confirmatory sampling was conducted by ABB Environmental Services, Inc. in May 1995 as part of the RFA-VSI. No stains or other signs of releases were observed at that time. Field activities included the collection of eight surface and six subsurface soil samples and the installation and sampling of six shallow groundwater monitoring wells. Benzo(a)pyrene equivalents exceeded the FDEP Soil Cleanup Target Level (SCTL) of 100 micrograms per kilogram ($\mu\text{g}/\text{kg}$) in one surface soil sample. The location of the surface soil sample was near an asphalt covered parking lot; therefore, the presence of benzo(a)pyrene equivalents was not attributed to the SWMUs. Arsenic exceeded the FDEP SCTL of 2.1 milligrams per kilogram (mg/kg) in one subsurface soil sample; however, the concentration was less than the NAVSTA Mayport Background Screening Value (BSV) of 13.7 mg/kg . Therefore, arsenic is not considered a **contaminant of concern** (COC) for SWMUs 20 and 21. Manganese exceeded the FDEP Groundwater Cleanup Target Level (GCTL) of 50 micrograms per liter ($\mu\text{g}/\text{L}$) in groundwater at SWMUs 20 and 21; however, the concentration was

less than the NAVSTA Mayport BSV of 141 µg/L. Therefore, manganese is not considered a COC for groundwater.

SUMMARY OF FACILITY RISKS

The FDEP Cleanup Target Levels (CTLs) are based upon human health risk criteria. Sample results that exceed the FDEP CTLs indicate a potential concern for SWMUs 20 and 21.

Human Health Baseline Risk Assessment

Soil. Benzo(a)pyrene exceeded the FDEP SCTL of 100 µg/kg in surface soil. The sample location was in close proximity to asphalt covered parking areas; therefore, the sample result was not attributed to SWMUs 20 and 21. One subsurface soil sample result of arsenic exceeded the Florida SCTL. The detected concentration of arsenic did not exceed NAVSTA Mayport BSVs; therefore, arsenic was not retained as a COC.

Groundwater. One groundwater sample result exceeded the Florida GCTL for manganese. The detected concentration of manganese did not exceed NAVSTA Mayport BSVs; therefore, manganese was not retained as a COC.

Conclusions

No COCs were identified for surface soil, subsurface soil, or groundwater at SWMUs 20 and 21.

SCOPE OF CORRECTIVE ACTION

No COCs were identified for SWMUs 20 and 21.

SUMMARY OF ALTERNATIVES

No COCs are identified at SWMUs 20 and 21; therefore, No Action is recommended for SWMUs 20 and 21.

PUBLIC PARTICIPATION

The FDEP will make a final decision and incorporate corrective measures into the HSWA permit and is soliciting public review and comment on this SB for the proposed corrective action for SWMUs 20 and 21 at NAVSTA Mayport. The 40 Code of Federal Regulations (CFR) 124.10(6) requires a 45-day comment period for a permit modification request made by the permittee under RCRA. The FDEP has undertaken the lead role on this request initiated by the Navy (the permittee). The comment period will begin on April 14, 2014, and will be published in the *Jacksonville Daily Record*.

Copies of the RFI, CMS Report, and the SB are available for public review at the Information Repository located

at the Jacksonville Public Library - Beaches Branch, 600 3rd Street, Neptune Beach, Florida, 32266 [Phone (904) 241-1141].

A public hearing will be held if one is requested. To request a public hearing, to obtain more information about this SB, or to submit written comments, please contact Paul Malewicki or John Winters (contact information provided below).

All comments must be postmarked no later than May 30, 2014.

CONTACTS

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Next Steps

The FDEP will modify the HSWA permit to incorporate the final decision on the RCRA permit modification request when the permit is renewed, unless otherwise indicated. The final decision will detail the No Action corrective measure chosen for SWMUs 20 and 21 and will include responses to comments received during the **public comment period** in a **Response to Comments Summary**.

Notice will be given to the Navy and to each person who has submitted written comments or who has requested notice of the final decision when the permit is modified. The final permit decision shall become effective 30 days after the issuance of the notice of the decision unless a later date is specified or review is requested under 40 CFR 124.19. The final permit modification shall become effective immediately upon issuance if no comments are received requesting a change in the draft permit.

KEY WORDS

BSV	Background Screening Value	µg/L	Microgram per Liter
CFR	Code of Federal Regulations	mg/kg	Milligram per Kilogram
CMS	Corrective Measures Study	NAVSTA	Naval Station
COC	Contaminant of Concern	RCRA	Resource Conservation and Recovery Act
CTL	Cleanup Target Level	RFA	RCRA Facility Assessment
FDEP	Florida Department of Environmental Protection	RFI	RCRA Facility Investigation
GCTL	Groundwater Cleanup Target Level	SB	Statement of Basis
HSWA	Hazardous and Solid Waste Amendments	SCTL	Soil Cleanup Target Level
µg/kg	Microgram per Kilogram	SWMU	Solid Waste Management Unit
		VSI	Visual Site Inspection

GLOSSARY

Aquifer: An underground layer of permeable rock, sediment, or soil capable of storing and transporting water within cracks and pore spaces or between grains.

Contaminant of Concern (COC): A contaminant detected in environmental media at a concentration that may adversely affect human health or ecological receptors.

Corrective Measure: Includes corrective action necessary to protect human health and the environment for releases of hazardous constituents from any SWMU at the facility regardless of the time at which waste was placed at the location as required by 40 CFR 264.101. Actions may address releases to air, soils, surface water, or groundwater.

Corrective Measures Study (CMS): A step in the RCRA corrective action process where the owner and operation identifies and evaluates cleanup alternatives for addressing contamination at a SWMU.

Florida Department of Environmental Protection (FDEP): The state agency responsible for implementing Florida environmental laws.

Groundwater: Water found within an aquifer.

Hazardous and Solid Waste Amendments (HSWA): Amendments to RCRA, passed in 1984, which greatly expand the nature and complexity of activities covered under RCRA.

Human Health Baseline Risk Assessment: Study to determine the likelihood that a given exposure or series of exposures may have damaged or will damage human health.

Information Repository: A public file containing technical reports, reference documents and other materials relevant to the SWMU cleanup.

Interim Measure: An action taken to address a release or potential release of hazardous substances posing immediate danger to human health or the environment.

No Action: Recommendation or decision indicating no contaminants above regulatory limits.

Permit: A RCRA permit, issued for NAVSTA Mayport, establishes the facility's operating conditions for managing hazardous waste.

Public Comment Period: A legally required opportunity for the community to provide written and oral comments on a proposed environmental action.

RCRA Facility Assessment (RFA): Gathers information on releases at RCRA facilities, evaluates the nature and extent of the releases of hazardous waste, and determines if releases warrant further investigation or other action.

RCRA Facility Investigation (RFI): Evaluates the nature and extent of the releases of hazardous waste.

Resource Conservation and Recovery Act (RCRA) of 1976: Requires each hazardous waste treatment, storage and disposal facility to manage hazardous waste in accordance with a permit issued by the USEPA or a State agency that has a hazardous waste program approved by the USEPA.

Response to Comments Summary: A document summarizing the public comments received and the responses to the comments.

Risk Assessment: A study estimating the potential risk a SWMU poses to human health and the environment.

GLOSSARY

Solid Waste Management Unit (SWMU): Any discernable unit (to include regulated units) at which RCRA regulated waste has been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste.

Surface Soil: Soil from 0 to 2 feet below land surface.

Subsurface Soil: Soil 2 feet below land surface and deeper.

Statement of Basis (SB): A public participation document detailing the proposed corrective action at a SWMU.

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**Comments on the Statement of Basis for
Solid Waste Management Units 20 and 21**

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