

N60200.PF.009575
NAS CECIL FIELD
5090.3b

TRANSMITTAL LETTER AND U S EPA REGION IV FIVE-YEAR REVIEW PROTECTIVENESS
DETERMINATION NAS CECIL FIELD FL
9/22/2015
U S EPA REGION IV



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

SEP 22 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

BRAC PMO E
Attn: Mr. David Barney
203 South Davis Drive, Building 247
Joint Base Charleston, South Carolina 29404

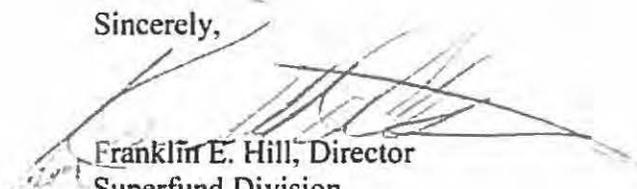
Dear Mr. Barney:

The U.S. Environmental Protection Agency has reviewed the draft Five-Year Review (5YR) for Operable units 1, 2, 5, 7, 8, 9, 10, 11 and 12 at the Naval Air Station Cecil Field. The draft report was submitted on June 2, 2015 and the EPA provided comments on August 12, 2015. Since not all comments on the report have been submitted to the Navy, the Navy will not be able to finalize the document by the due date. Therefore, the EPA is making the protectiveness determination, for the operable units addressed in this 5YR Report, based upon the information provided in the report.

In accordance with the EPA's 5YR guidance, and in consultation with the EPA Headquarters, the EPA Region 4 has made a determination regarding the protectiveness of the remedies. Enclosed is the EPA's 5YR Protectiveness Determination presenting EPA's findings that includes a summary form, tables listing issues, recommendations/follow-up actions, milestone dates, protectiveness statements, and the next 5YR due date as identified and agreed to by all parties as part of this review. The EPA tracks 5YR findings in the EPA's database. Progress made by the Navy on the recommended actions is reported to Congress and monitored against the assigned milestone due dates. Since the protectiveness determination is based on a draft report, the revised 5YR document will be required to be completed and submitted by the Navy for the EPA's review and approval by September 26, 2016. This report due date has been included on the summary form as a required addendum to the EPA's 5YR determination. The EPA will continue to work with the Navy on achieving this goal. The next five-year review due date for the fifth review is September 26, 2020.

If you have any questions regarding this letter, please contact Pete Dao of my staff at (404) 562-8508.

Sincerely,



Franklin E. Hill, Director
Superfund Division

Enclosure:

cc: Mr. David Grabka, FDEP

**U.S. Environmental Protection Agency Region IV
Five-Year Review Protectiveness Determination for
Naval Air Station Cecil Field
Jacksonville, FL
September, 2015**

The U.S. Environmental Protection Agency Region 4 prepared this five-year review protectiveness determination based on the Draft Five-Year Review for Operable Units 1, 2, 5, 7, 8, 9, 10, 11, and 12 at the Naval Air Station Cecil Field Jacksonville, FL (June 2015) submitted by the Base Realignment and Closure Program Management Office East. This review address the following Operable Units (OUs) at Former Naval Air Station Cecil Field, Jacksonville, Florida:

- OU 1 — Sites 1 and 2 (Old Landfill, Recent Landfill)
- OU 2 — Site 5 (Oil Disposal Area Northwest) and Site 17 (Sludge Disposal Pit Southwest)
- OU 5 — Site 15 (Blue 10 Ordnance Disposal)
- OU 7 — Site 16 (AIMD Seepage Pit)
- OU 8 — Site 3 (Soil/Sludge Disposal Pit)
- OU 9 — Sites 36 and 37 (Control Tower/Hangars 13 and 14); Site 57 (Flightline Building 324A/Day Tank 1); Site 58 (Flightline Building 312); and Site 59 (Buildings 324/1845)
- OU 10 — Site 21 (Golf Course Maintenance Area)
- OU 11 — Site 45 (Facility 11 Steam Generating Plant)
- OU 12 — Site 32 (DRMO Asphalt Storage Yard)

This is the fourth Five-Year Review for Former NAS Cecil Field. The triggering action event for the first Five-Year Review was the OU 7, Site 16 Interim Record of Decision dated 2 June 1994.

Five-Year Review Summary Form

SITE IDENTIFICATION		
Site Name: Naval Air Station Cecil Field		
EPA ID: FL5170022474		
Region: 4	State: FL	City/County: Jacksonville/Duval
SITE STATUS		
NPL Status: Final		
Multiple OUs? Yes	Has the site achieved construction completion? Yes	
REVIEW STATUS		
Lead agency: Other Federal Agency If "Other Federal Agency" was selected above, enter Agency name: Department of the Navy, BRAC PMO East Site		
Author name (Federal or State Project Manager): Pete Dao		
Author affiliation: EPA Region IV		
Review period: September 2009 — September 2014		
Date of site inspection: 19 August 2014		
Type of review: Statutory		
Review number: 4		
Triggering action date: 26 September 2010		
Due date (five years after triggering action date): 26 September 2015		

Issues and Recommendations Identified in the Five-Year Review:				
OU: 0002-Site 5	Issue Category: Changed Site Conditions			
	Issue: During the 2011 Five-Year Review, additional delineation was required to assess contaminants in groundwater near CEF-005-LTM01. Fieldwork was initiated in 2012; however, investigations could not be completed due to the COJ stockpile sloughing onto Site 5. The continued presence of the stockpile prevents groundwater delineation.			
	Recommendation: Coordinate removal of the stockpile with COJ, and complete proposed delineation activities.			
Affect Current Protectiveness	Affect Future Protectiveness	Implementing Party	Oversight Party	Milestone Date
No	Yes	Federal Facility	EPA/State	September 2018
OU: 0007-Site 16	Issue Category: Monitoring			
	Issue: Vapor intrusion screening did not identify a short-term protectiveness issue at Site 16 due to CVOCs in groundwater; however, further assessment is required to determine if long-term protectiveness is affected by VI.			
	Recommendation: Perform additional investigation/assessments, as outlined in Appendix D.			
Affect Current Protectiveness	Affect Future Protectiveness	Implementing Party	Oversight Party	Milestone Date
No	Yes	Federal Facility	EPA/State	September 2018
OU: 0009-Site 59	Issue Category: Monitoring			
	Issue: Vapor intrusion screening did not identify a short-term protectiveness issue at Site 59 due to CVOCs in groundwater; however, further assessment is required to determine if long-term protectiveness is affected by VI.			
	Recommendation: Perform additional investigation/assessments, as outlined in Appendix D.			
Affect Current Protectiveness	Affect Future Protectiveness	Implementing Party	Oversight Party	Milestone Date
No	Yes	Federal Facility	EPA/State	September 2018

Protectiveness Statement(s)

<i>Operable Unit:</i> 00001-Sites 1 and 2	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date (if applicable):</i> 9/26/16
--	--	---

Protectiveness Statement:

The source control and risk reduction remedies implemented at OU 1 are protective of human health and the environment. Exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs that: (1) prohibit the disturbance of wetlands and morphological features of the Site 2 tributary and Rowell Creek which aid in natural attenuation of contamination, (2) prohibit groundwater use, (3) prohibit residential, recreational, and agricultural use of the site, and (4) prohibit excavation of soils and sediments, and disturbance of the landfill cover. The remedy has been implemented as designed, and provides effective containment of the wastes in the landfills. The LTM program has been implemented as designed, and results indicate that OU 1-related ecological impacts have improved and are limited to the upstream portions of the Site 2 tributary.

<i>Operable Unit:</i> 00002-Site 5	<i>Protectiveness Determination:</i> Short-term Protective	<i>Addendum Due Date (if applicable):</i> 9/26/16
---------------------------------------	---	---

Protectiveness Statement:

Site 5: The remedy at OU 2, Site 5 is protective in the short term, as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs prohibiting residential use of the site, excavation of the soil cover overlying contaminated subsurface soils, and restricting groundwater use until cleanup goals have been achieved. LTM indicates contaminants are naturally attenuating and RAOs, COCs, and LUCs are being clarified based on review of post-remedy decision documents and will be documented in an ESD, scheduled to be finalized in September 2016. The groundwater delineation program initiated in 2012 must be completed to assess long-term protectiveness.

<i>Operable Unit:</i> 00002-Site 17	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date (if applicable):</i> 9/26/16
--	--	---

Protectiveness Statement:

Site 17: The remedy at OU 2, Site 17 is protective, as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs prohibiting residential use of the site and groundwater use until cleanup goals have been achieved. LTM indicates progress toward achieving remedial goals. In addition, RAOs and COCs are being clarified based on review of post-remedy decision documents and will be documented in an ESD, scheduled to be finalized in September 2016.

<i>Operable Unit:</i> 00005-Site 15	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date (if applicable):</i> 9/26/16
--	--	---

Protectiveness Statement:

The OU 5, Site 15 remedy is protective of human health and the environment, as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs prohibiting excavation of site soils and prohibiting uses of the site other than low-intensity recreational activities. Soil excavation activities were implemented as designed and achieved RAOs. LUCs were implemented by the Navy upon finalization of the LUC RD in May 2009 and amended in 2014 to account for the residual risk of MEC items remaining onsite after the completion of the NTCRA in 2013.

Protectiveness Statement(s)

<i>Operable Unit:</i> 00007-Site 16	<i>Protectiveness Determination:</i> Short-term Protective	<i>Addendum Due Date</i> <i>(if applicable): 9/26/16</i>
--	---	---

Protectiveness Statement:

The Site 16 remedy is protective of human health and the environment in the short term as exposure pathways that could result in unacceptable risks have been controlled through implementation of LUCs prohibiting use of groundwater until cleanup levels are achieved. The IRA removal of soil and structures that acted as a source of groundwater contamination was completed in 1994 and met the RAOs identified in the IROD. Operation of the AS/VE through 2009 was effective in reducing source area groundwater concentrations. LTM is currently monitoring natural attenuation, which continues to be effective in reducing dissolved concentrations of contaminants in groundwater. Further evaluation of the VI pathway is warranted for determining long-term protectiveness.

<i>Operable Unit:</i> 00008-Site 3	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date</i> <i>(if applicable): 9/26/16</i>
---------------------------------------	--	---

Protectiveness Statement:

The OU 8, Site 3 remedy is protective of human health and the environment. Source area AS and the associated groundwater monitoring program were implemented as designed. Additionally, LUCs have been established for the ongoing protection of human health and the environment. Results indicate that the AS system in the disposal pit area was effective in reducing Site 3 COCs. The SPAS pilot test system was integrated after the last five-year review to evaluate the feasibility of treatment adjacent to Rowell Creek; this system is still being optimized and evaluated.

<i>Operable Unit:</i> 00009-Sites 36 and 37	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date</i> <i>(if applicable): 9/26/16</i>
--	--	---

Protectiveness Statement:

The OU 9, Sites 36 and 37 remedy is protective of human health and the environment, as exposure pathways that could result in unacceptable risks have been controlled through implementation of LUCs prohibiting use of groundwater until cleanup levels are achieved. The LTM program was implemented as designed, and results indicate progress toward achieving remedial goals.

<i>Operable Unit:</i> 00009-Site 57	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date</i> <i>(if applicable): 9/26/16</i>
--	--	---

Protectiveness Statement:

Site 57: The Site 57 remedy is protective of human health and the environment, as exposure pathways that could result in unacceptable risks have been controlled through implementation of LUCs prohibiting groundwater use. The LTM program was implemented as designed, and MNA results indicate progress toward achieving remedial goals.

<i>Operable Unit:</i> 00009-Site 58	<i>Protectiveness Determination:</i> Protective	<i>Addendum Due Date</i> <i>(if applicable): 9/26/16</i>
--	--	---

Protectiveness Statement:

Site 58: The Site 58 remedy is protective of human health and the environment, as exposure pathways that could result in unacceptable risks have been controlled through implementation of LUCs prohibiting groundwater use. The LTM program was implemented as designed, and MNA results indicate progress toward achieving remedial goals.

Protectiveness Statement(s)

Operable Unit:
00009-Site 59

Protectiveness Determination:
Short-term Protective

Addendum Due Date
(if applicable): 9/26/16

Protectiveness Statement:

The OU 9, Site 59 remedy protects human health and the environment in the short term as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs prohibiting all uses of the groundwater from the surficial aquifer underlying the site until cleanup goals are achieved. In situ biological treatment addresses hot spot groundwater concentrations; long-term monitoring evaluates progress to achieving treatment goals. The potential effects of VI on long-term protectiveness may warrant further site evaluations.

Operable Unit:
00010-Site 21

Protectiveness Determination:
Protective

Addendum Due Date
(if applicable): 9/26/16

Protectiveness Statement:

The remedy at OU 10, Site 21 is protective, as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs prohibiting residential use of the site, excavation of soils, and groundwater use until cleanup goals have been achieved. LTM indicates contaminants are naturally attenuating.

Operable Unit:
00011-Site 45

Protectiveness Determination:
Protective

Addendum Due Date
(if applicable): 9/26/16

Protectiveness Statement:

The Operable Unit 11, Site 45 remedy protects human health and the environment as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs. LTM ensures contamination is not migrating offsite and that natural attenuation of vanadium is effective.

Operable Unit:
00012-Site 32

Protectiveness Determination:
Protective

Addendum Due Date
(if applicable): 9/26/16

Protectiveness Statement:

The remedy at OU 12, Site 32 is protective, as exposure pathways that could result in unacceptable risks are being controlled through implementation of LUCs that require inspection and maintenance of the existing asphalt cap and prohibit residential, agricultural, and recreational use. LTM has been implemented as designed and continues to verify that soil contaminants have not migrated to groundwater at unacceptable levels.