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PROPOSED PLAN FOR SOIL REMEDY AT TRUMAN ANNEX FORMER LUBE AREA NAS
KEY WEST FL
9/19/1999
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PROPOSED PLAN



Naval Air Station Key West, Florida

Facility/Unit Type: Former Lube Area at Truman Annex
Contaminants: Arsenic
Media: Soil
Remedy: No Further Action

INTRODUCTION

This Proposed Plan is issued by the U.S. Navy, the lead agency for Naval Air Station (NAS) Key West remedial activities, with concurrence by the U.S. Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP). The proposed remedial activities are conducted under the Department of Defense's Base Realignment and Closure (BRAC) program in accordance with Section 120 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the National Contingency Plan (NCP), and the FDEP Brownfields Cleanup Criteria Rule (62-785.680 F.A.C.). The Former Lube Area at Truman Annex is the area of interest and is known as Parcel F, Subzone 1.

This Proposed Plan identifies the proposed remedy for the Former Lube Area at NAS Key West, explains the rationale for the preference, solicits public review and comments on the conclusions of the Supplemental Site Inspection (SSI), and provides information as to how the public can be involved in the remedy selection process. The Proposed Plan provides a summary of past environmental work at the Former Lube Area. This document provides key highlights of the SSI Report but should not be used as a substitute. Additional details regarding the site and the investigation conducted may be found in the SSI Report that is kept as part of the information repository. Please refer to the cover letter for the repository location.

The public is encouraged to comment on the proposed remedy. The U.S. Navy emphasizes that the proposed remedy is the initial recommendation of the Agency. Changes to the proposed remedy, or a change from the proposed remedy to another remedy, may be made if public comments or additional data indicate that such a change would result in a more appropriate solution.

PROPOSED REMEDY

The proposed remedy is no remedial action beyond that carried out under the Interim Remedial Action (IRA) because contamination at the site has been sufficiently remediated. No costs are associated with the no-further-action designation.

FACILITY BACKGROUND

The Former Lube Area is comprised of several parts. The area around Building 223 (Equipment Repair Shop) is currently used as storage for Port Services. Little is known about previous activities in the building; however, the name implies that naval support equipment was repaired at the building. A closed hazardous waste storage area is south of Building 223. Building 1287 is a closed galley that operated during the 1960s. Adjacent to Building 1287 was a motor pool that operated during the 1950s. Fuels, used oils, solvents, and metals were potential contaminants at the Former Lube Area.

The Site Inspection (SI) sample results for the Former Lube Area indicated only one inorganic (arsenic) at one location in excess of its NAS Key West Partnering Team-selected action level (2.7 mg/kg). The Engineer's Estimate/Cost Analysis (EE/CA) for Alternatives for BRAC Fast Track Soil Removal Parcels and the Action Memorandum for BRAC Fast Track Soil Removal Parcels briefly describe contamination at the Former Lube Area, remedial alternatives evaluated for the IRA, and costs associated with remediation. The SSI Report describes in detail the IRA performed and locations and results of confirmation samples taken at the site.

The IRA at the Former Lube Area removed approximately 62 cubic yards of contaminated soil to a depth of 2 feet in the area shown in Figure 1. The SI analyte of concern, arsenic, showed a reduction in concentration from 5.2 mg/kg before excavation to values ranging from 0.63 to 1.9 mg/kg after excavation (action level = 2.7 mg/kg). The required 95 percent confidence level set by the NAS Key West Partnering Team, that all contaminants in exposed soils above 2 feet be below their respective action levels, was achieved at the site. The soil removal activities were performed in accordance with FDEP Brownfields Cleanup Criteria Rule, No Further Action Criteria [62-785.680 F.A.C.] that provided a secondary regulatory driver to remove all contaminated soils to 2 feet below land surface. Clean fill was placed in the excavation and graded. No further action is recommended at the Former Lube Area.

SCOPE OF THE REMEDIAL ACTION

The U.S. Navy recognizes that CERCLA allows various options for implementing remedies based on site conditions. For the Former Lube Area at NAS Key West, the SSI Report indicates that the IRA (soil removal) reduced the threat to human health and the environment to acceptable levels in accordance with CERCLA, the NCP, and the Brownfields Cleanup Criteria Rule. Therefore, there is sufficient justification to propose no further action for the site. There are no costs associated with the no further action remedy.

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NEXT STEPS

Following a 30-day public comment period, the U.S. Navy will issue a final decision on the proposed remedy. The Decision Document, which will describe the remedy chosen for the Former Lube Area and other BRAC sites, will include responses to comments received during the public comment period. Concurrence from EPA and FDEP will be obtained before implementing the final remedy.

