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PROPOSED PLAN FOR SOIL REMEDY AT TRUMAN ANNEX BUILDINGS 102 AND 104 NAS  
KEY WEST FL  
9/19/1999  
NAS KEY WEST



## PROPOSED PLAN



### Naval Air Station Key West, Florida

**Facility/Unit Type:** Truman Annex Buildings 102 and 104  
**Contaminants:** Inorganics and SVOCs  
**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.). Buildings 102 and 104 at Truman Annex are the areas of interest and are known as Parcel E, Subzone 3.

This Proposed Plan identifies the proposed remedy for Buildings 102 and 104 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 Truman Annex Buildings 102 and 104. 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 further action because contamination at the site has been sufficiently remediated. No costs are associated with implementing and administering this proposed remedy.

#### FACILITY BACKGROUND

Buildings 102 and 104 are located in an area known as the Inner Mole Pier. The area has served as a naval docking and support facility for more than a century. Most records of the area date to the period of World War II. In the late 1980s, the Inner Mole Pier waterfront was refurbished along with the Outer Mole Pier. Buildings 102 (Former Torpedo Overhaul and Storehouse) and 104 (Former Battery Overhaul and Storage) are still standing but are out of service. Knowledge of the operations in these buildings is limited to naval submarine support activities. Hazardous materials, specifically volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and inorganics have probably been used in each of the buildings.

The Site Inspection (SI) sample results for samples taken at Buildings 102 and 104 indicated two SVOCs [benzo(a)pyrene and indeno(1,2,3-cd)pyrene] in excess of their respective FDEP residential action levels of 100 µg/kg and 1400 µg/kg. SSI sampling results also indicated three inorganics and two additional SVOCs in excess of FDEP and NAS Key West Partnering Team-selected action levels at locations beneath the buildings. However, the areas under these buildings have been identified as underground storage tank (UST) sites and they are addressed as part of the Resource Conservation and Recovery Act (RCRA) UST program. 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 Buildings 102

and 104, remedial alternatives evaluated for the Interim Remedial Action (IRA), and costs associated with remediation. The SSI Report describes in detail the SSI sampling, the IRA performed, and the locations and results of confirmation samples taken at the site.

The IRA at Buildings 102 and 104 excavated two separate areas of contaminated soil to a depth of 2 feet from the areas shown in Figure 1. A total of 1,022 cubic yards was excavated from the area around Buildings 102 and 104. The analyte of concern, indeno(1,2,3-cd)pyrene, showed a reduction in concentration from 1650 µg/kg before excavation to below detectable concentrations after excavation. Concentrations of benzo(a)pyrene do remain in excess of its FDEP residential action level along sidewalls of the excavations. These concentrations in the sidewalls range from 112 µg/kg to 225 µg/kg. However, these levels are considered to be low by the NAS Key West Partnering Team and considered to pose little risk. Furthermore the required 95-percent-confidence level set by the NAS Key West Partnering Team, that all exposed soils above 2 feet be below their respective action levels, was achieved for the sites. Clean fill was placed in the excavation to bring the ground level back to grade.

The soil removal activities were performed in accordance with the FDEP Brownfields Cleanup Criteria Rule, No Further Action criteria [62-785.680 F.A.C.] that provided a secondary regulatory driver to the site action levels. No further action is recommended at Buildings 102 and 104.

#### **SCOPE OF THE REMEDIAL ACTION**

The U.S. Navy recognizes that CERCLA allows various options for implementing remedies based on site conditions. For Buildings 102 and 104 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.

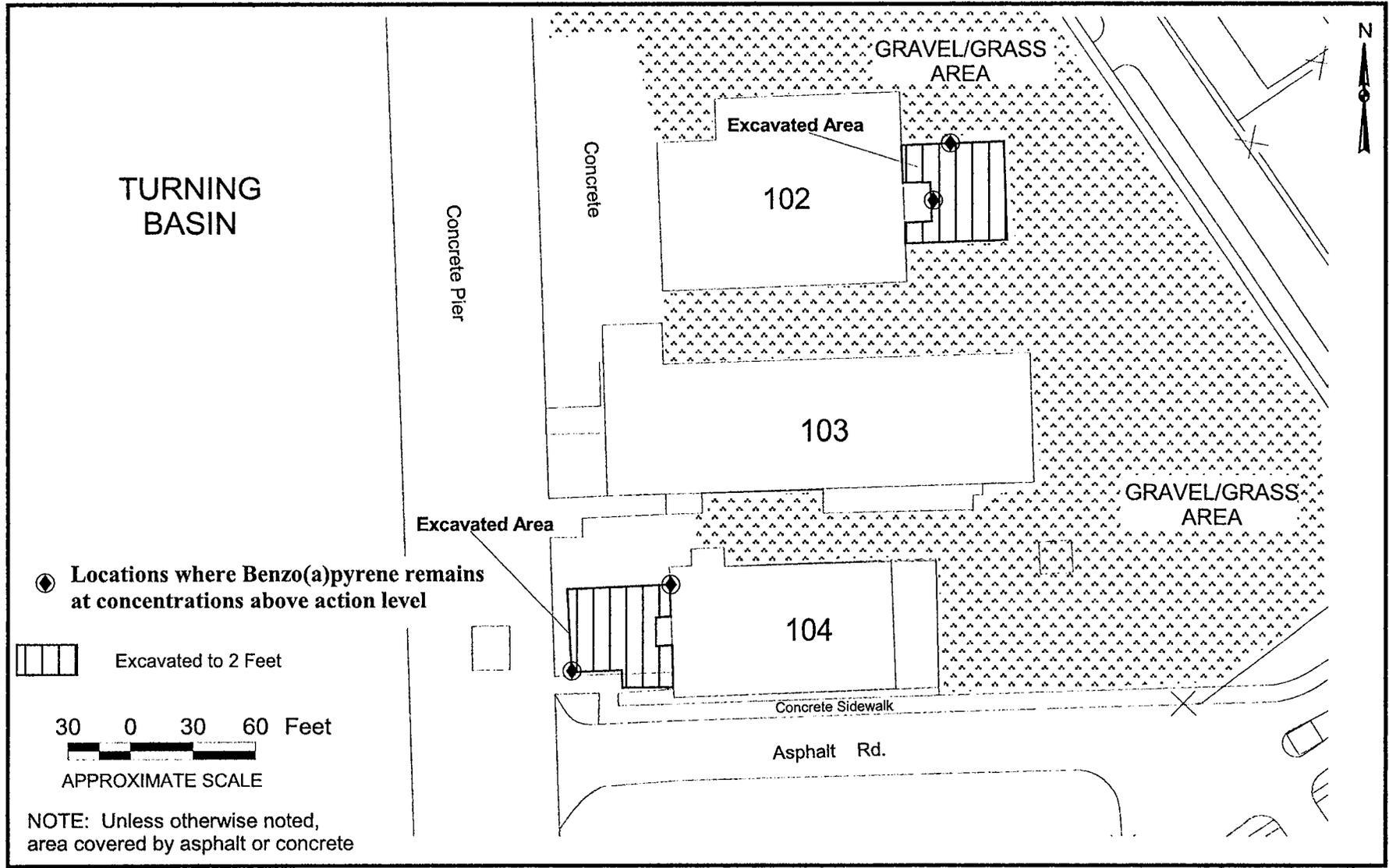
At Buildings 102 and 104, petroleum contamination was identified in groundwater as part of the RCRA UST program. A Contamination Assessment Report (CAR) and Remedial Action Plan (RAP) have been developed and implementation of the RAP is pending. Therefore, the groundwater issues associated with Buildings 102 and 104 are not addressed as part of this Proposed Plan.

#### **NAS Key West Contact**

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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 Buildings 102 and 104 and other BRAC sites, will include responses to oral comments received during the public comment period. Concurrence from EPA and FDEP will be obtained before implementing the final remedy.



◆ Locations where Benzo(a)pyrene remains at concentrations above action level

▨ Excavated to 2 Feet

30 0 30 60 Feet  
 APPROXIMATE SCALE

NOTE: Unless otherwise noted, area covered by asphalt or concrete