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NAS KEY WEST
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LETTER REGARDING SELECTION OF REMEDY FOR KW-65 HAWK MISSILE SITE PARCEL
TRANSFERRED TO THE FEDERAL AVIATION AUTHORITY WITH ATTACHMENTS NAS KEY
WEST FL
1/22/2001
NAVAL FACILITIES ENGINEERING COMMAND SOUTHERN DIVISION

22 January 2001

U. S. Department of Transportation
Federal Aviation Administration
Attn: Mr. Gerald Simon
Southern Region, Logistics Division
P. O. Box 20636
Atlanta, GA 30320

Dear Mr. Simon:

The Environmental Suitability Statement (ESS) for the transfer of 0.82 acres of the parcel known as the KW-65 Hawk Missile Site, located at Key West, Florida, to the Federal Aviation Authority, was signed by the Commanding Officer of Southern Division, Naval Facilities Engineering Command, on 14 July 1999. Section 4.0 of the ESS placed prohibitions on the installation of groundwater wells and extraction of groundwater. Further, the ESS stated that future demolition, construction, or excavation must be undertaken with an understanding that arsenic remains as a contaminant of potential concern in the soil. This was particularly true under existing building foundations.

As Section 6.0 of the ESS goes on to state, the Navy planned to complete the public comment process and corrective action at the site by November 1999. In the interim, the Commanding Officer signed off in Section 7.0, thereby stating that the subject property was suitable for transfer for proposed reuse, subject to those reuse restrictions identified in Section 4.0, and without interference to the environmental restoration process identified in Section 6.0.

The Navy is pleased to report that the public comment process and corrective action at the site were completed in November 1999 as scheduled. The corrective action resulted in all contaminated soil being removed from the site, with the exception being that soil located under the buildings at the site, which has the potential to be contaminated. In particular, out of the total set of confirmation samples taken at the site, there was a single confirmation sample taken after the soil excavation was completed which exceeded the action level for arsenic. Both the extent of the corrective action taken (excavation), and the location of the arsenic exceedence (A4-CONF-08), are provided on the figure included herein.

The Navy has prepared a Decision Document (DD) dated May 2000, which describes the final remedial action selected for this site. In it, the Navy has determined, with the concurrence of the Florida Department of Environmental Protection (FDEP), that the selected remedy is to provide land-use controls (LUC) for the site. These LUCs include both an engineering control and institutional controls. The engineering control (EC) is simply to maintain the existing concrete cover (foundation) over the single arsenic exceedence mentioned above. The figure depicts this EC. In addition, the soil

under other buildings and structures at the site may potentially harbor contaminants, and any plans to remove these buildings and structures may expose them. The transferee is responsible for all cleanup and costs in these instances. The institutional controls (IC) are to prohibit groundwater well installation and groundwater usage, and to maintain the EC described above.

The Navy has completed its obligations for public notice, corrective action, and the selection of a final remedy for the site. FAA, as transferee, is responsible for ensuring and maintaining the integrity of the final remedy, LUCs, as described herein. If you have any further questions, please contact me at 843/820-5541.

Sincerely,

DUDLEY PATRICK
Remedial Project Manager
Installation Restoration Program

CC:
Bob Courtright, NAS Key West
Ron Demes, NAS Key West
Jorge Caspary, FDEP Tallahassee

ENVIRONMENTAL SUITABILITY STATEMENT
FEDERAL AVIATION AUTHORITY TRANSFER, KW-65 HAWK MISSILE SITE
KEY WEST, FLORIDA

1.0 Purpose:

Consistent with the Base Closure and Realignment Act of 1990, Naval Air Station Key West was realigned. As a result of that realignment, the parcel known as KW-65 Hawk Missile Site was deemed excess to the needs of the Department of Defense. The Department of Transportation, Federal Aviation Agency, has been approved to receive the main administration building, the guard shack, and approximately 0.82 acres of land (Subject Property) within the KW-65 Hawk Missile Site. The property is located in Monroe County, Key West, Florida within the boundaries of the City of Key West and more particularly described in the attached Environmental Baseline Survey (EBS). The Subject Property has been inspected annually since 1994. No changes in the environmental condition of the property have been noted.

2.0 Past, Current, and Proposed Land Use:

The Subject Property is a portion of Tract 102 that was acquired by the United States from the Central Bank and Trust by deed in 1964 for the establishment of an Army Shore Defense Unit, Hawk Missile Command. Tract 102 was undeveloped with an extensive system of salt ponds at the time of acquisition. At no time during the documented Government ownership of the Subject Property has it been used as an industrial site. The Subject Property is currently vacant. Proposed land use is for aviation purposes.

3.0 Addendum for Transfer and Environmental Baseline Survey (EBS) Findings:

An EBS was prepared documenting the physical and environmental conditions of the Subject Property, resulting from the past storage, use, and disposal of hazardous substances and/or petroleum products or their derivatives over the installation's history. The EBS was based on information obtained through a records search, interviews, aerial photographs, and visual inspections of the property.

An Addendum for Transfer (AFT) has been prepared documenting additional information acquired since development of the EBS. Subsequent site inspections determined there had been a release resulting in an elevated level of arsenic in soil in three of the four samples taken around the sewage lift station. A permanent monitoring well was installed in the area in 1998. Results from the initial monitoring well sampling event indicate arsenic is present in the groundwater above marine waters action levels; however, the groundwater is classified by the Florida Environmental Protection Department (FDEP) as non-potable. Additionally, based on sampling conducted in the adjacent salt ponds and stormwater retention areas, there does not appear to be a complete migration pathway from the isolated detection of arsenic in groundwater within the confines of the Subject Property to nearby surface water or sediment. The Navy has excavated soil to a depth of two feet to remove arsenic contamination in excess of the FDEP action limit of 2.7 ppm. Confirmatory sampling was conducted after the excavation and additional soil was removed. Preliminary results indicate arsenic in excess of the target limit may remain under the

**ENVIRONMENTAL SUITABILITY STATEMENT
FEDERAL AVIATION AUTHORITY TRANSFER, KW-65 HAWK MISSILE SITE
KEY WEST, FLORIDA**

main administration building. Public comments will be requested on this closure and incorporated into a CERCLA Decision Document (DD). The decision to close the permanent monitoring well will be made at the conclusion of the public hearings for the DD.

One 500-gallon aboveground storage tank (AST) was removed from the Subject Property in 1996. Sampling conducted during the site closure indicated no release of petroleum product had occurred.

Asbestos-containing material (ACM) was observed in the main administration building in the form of vinyl floor tiles and transite paneling during the 1994 site visit. During the licensed use in 1996-1997 of the Subject Property by the Disabled Vietnam Veterans, the building was gutted and rebuilt. It is unknown if any ACM remains in the building.

During an annual site visit in 1996, the inspection team noted cans marked "lead-paint" were stored in an adjacent bunker by the veterans group. Therefore, it is presumed that the veterans group did apply lead-based paint to the exterior and possibly the interior of the building.

It has been determined that this proposed transfer will cause no adverse environmental impacts. The proposed use of Subject Property will be consistent with past use and qualifies for Categorical Exclusion (CATEX) under the National Environmental Policy Act (NEPA).

4.0 Recommended Reuse Restrictions: The installation of groundwater wells and extraction of groundwater is prohibited within the Subject Property. Future demolition, construction, or excavation must be undertaken with the understanding that arsenic potentially remains in soils under the excavated area and the building foundation which should be managed in accordance with all federal, state, and local environmental and health and safety laws and regulations.

5.0 Federal Facility Agreement (FFA): There are no FFAs associated with the Subject Property.

6.0 Environmental Restoration Responsibility: The corrective action is awaiting public comment and is scheduled for completion in November 1999. The Navy will retain responsibility for further remedial action concerning the arsenic on the Subject Property if it is found the completed action is not protective of human health and the environment. Any additional environmental action necessitated by a change in land use or additional construction will be the responsibility of the FAA.

7.0 Suitability for Transfer:

Based upon a review of the findings contained in the AFT and the EBS, I have determined the following:

There has been a release of a hazardous substance, and some level of contamination remains.

ENVIRONMENTAL SUITABILITY STATEMENT
FEDERAL AVIATION AUTHORITY TRANSFER, KW-65 HAWK MISSILE SITE
KEY WEST, FLORIDA

Subject Property can be transferred for the proposed reuse, subject to those reuse restrictions identified above, with acceptable risk to human health and the environment and without interference with the environmental restoration process.

14 July 1999
(Date)

W.H. Lewis
W.H. LEWIS, CAPT, CEC, USN
Commanding Officer
Southern Division
Naval Facilities Engineering Command

**ADDENDUM FOR TRANSFER
FAA PARCEL KW-65 HAWK MISSILE SITE
NAVAL AIR STATION KEY WEST, FLORIDA**

This Addendum For Transfer (AFT) has been prepared to document actions taken to determine potential environmental hazards at the KW-65 Hawk Missile Site FAA parcel (Subject Property) and any applicable corrective actions. Pictures of the Subject Property are attached to this AFT as Figures A-1 and A-2.

The Navy conducted a Site Inspection (SI) on the Subject Property in December 1998 (Attachment 1). Four soil screening samples and a groundwater sample from monitoring well MW-04 were taken at the sewage lift station behind the Headquarters building. Results of three of the four initial soil screening samples indicated elevated levels of arsenic (28.8 milligrams per kilogram (mg/kg), 6 mg/kg, and 5.7 mg/kg). The Florida Department of Environmental Protection (FDEP) soil action level for arsenic is 2.7 mg/kg. The groundwater sample returned a result of 154 micrograms per liter ($\mu\text{g/l}$) arsenic.

A Supplemental Site Investigation (SSI) was initiated as a result of the SI. The results of the SSI for the Subject Property are documented in Attachment 2. The Navy initially excavated soil from a 25' x 35' x 2' area encompassing the sewage lift station in March 1999. Five soil samples were taken from the excavation sidewalls and analyzed for inorganics. Several inorganic compounds were detected during confirmation sampling; however, arsenic was the only inorganic compound detected that exceeded soil action levels (9 mg/kg and 35.9 mg/kg) in two locations (Tetra Tech NUS, 5-99). Additional soil was excavated to the south and east of the original excavation as shown in the attached drawing (Attachment 2). The team was unable to obtain a soil sample from the east wall of the additional excavation due to the presence of bedrock. The southern excavation extension ended at a structural concrete foundation, where sample A4-CONF-08 was collected. The result for this sample was 21.4 mg/kg arsenic, which is still above FDEP action levels. The excavation was backfilled with two feet of clean soil to reduce receptor exposure to potentially contaminated soil which may extend below two feet. No further excavation was conducted due to the presence of the foundations, which act as an engineering control. A recommendation should be included in the Environmental Suitability Statement (ESS) that any future demolition, construction, or excavation should be undertaken with the understanding that arsenic potentially remains in soils under the excavated area and building foundation which should be managed in accordance with all federal, state, and local environmental and health and safety laws and regulations.

Surface waters and sediments were also sampled during the initial SI. No arsenic was detected in the surface waters or sediments of any of those locations. As noted above, arsenic was found in a groundwater screening sample and MW-04 was constructed. Samples from MW-04 indicated a level of arsenic in excess of the Florida Department of Environmental Protection (FDEP) marine action level; however, the groundwater is classified as non-potable. Based on sampling within the Subject Property and on the remaining Hawk Missile site adjacent property, there does not appear to be a complete migration pathway from the isolated

**ADDENDUM FOR TRANSFER
FAA PARCEL KW-65 HAWK MISSILE SITE
NAVAL AIR STATION KEY WEST, FLORIDA**

detection of arsenic in groundwater found within the Subject Property to nearby surface water and sediment. Ecological risks posed by the arsenic in groundwater are minimal; therefore, no further remedial action will be recommended for the groundwater at the Subject Property based on the anticipated reuse. It is also recommended that groundwater extraction and use be prohibited.

One 500-gallon aboveground storage tank (AST) was removed from the site in April 1996. A closure report was issued by Public Works Center, Pensacola, Florida. Soil sampling, as well as groundwater grab sampling conducted at the location of the 500-gallon AST indicated no signs of contamination above the state target levels.

The Navy will prepare a CERCLA Decision Document(DD) detailing the investigations and remedial actions taken at the Hawk Missile site. Based on the findings of the SSI, the DD will recommend no further remedial action be undertaken with regard to the soils and groundwater. Appropriate land use controls, as necessary, will be included in the DD which is scheduled for public review in November 1999.

July 9, 1999
(Date)

Karen H. Snodgrass
KAREN H. SNODGRASS
Environmental Specialist
Environmental Department

TRANSFER AND ACCEPTANCE OF MILITARY REAL PROPERTY

PAGE OF PAGES

1. FROM: (Installation/Activity/Service) Naval Air Station Key West, FL		2. OPERATING UNIT	3. DISTRICT CODE	4. OPERATING AGENCY DON	5. DATE 30 Sep 1999	6. JOB NUMBER	7. SERIAL NUMBER	8. CONTRACT NUMBER
9. TO: (Installation/Activity/Service) U. S. Dept. of Transportation Federal Aviation Administration Southern Region Atlanta, GA 30320		10. OPERATING UNIT	11. DISTRICT CODE	12. OPERATING AGENCY FAA	13. ACCOUNTING NUMBER	14. ACCOUNTABLE OFFICE NUMBER	15. TYPE OF TRANSACTION <input type="checkbox"/> NEW CONSTR. <input type="checkbox"/> BENF/O <input checked="" type="checkbox"/> EXISTING FAC. <input type="checkbox"/> PHYSICAL COM. <input type="checkbox"/> CAPITAL IMP. <input type="checkbox"/> FINAN. COM. <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/> OTHER (Specify)	
							16. PROJECT NUMBER	

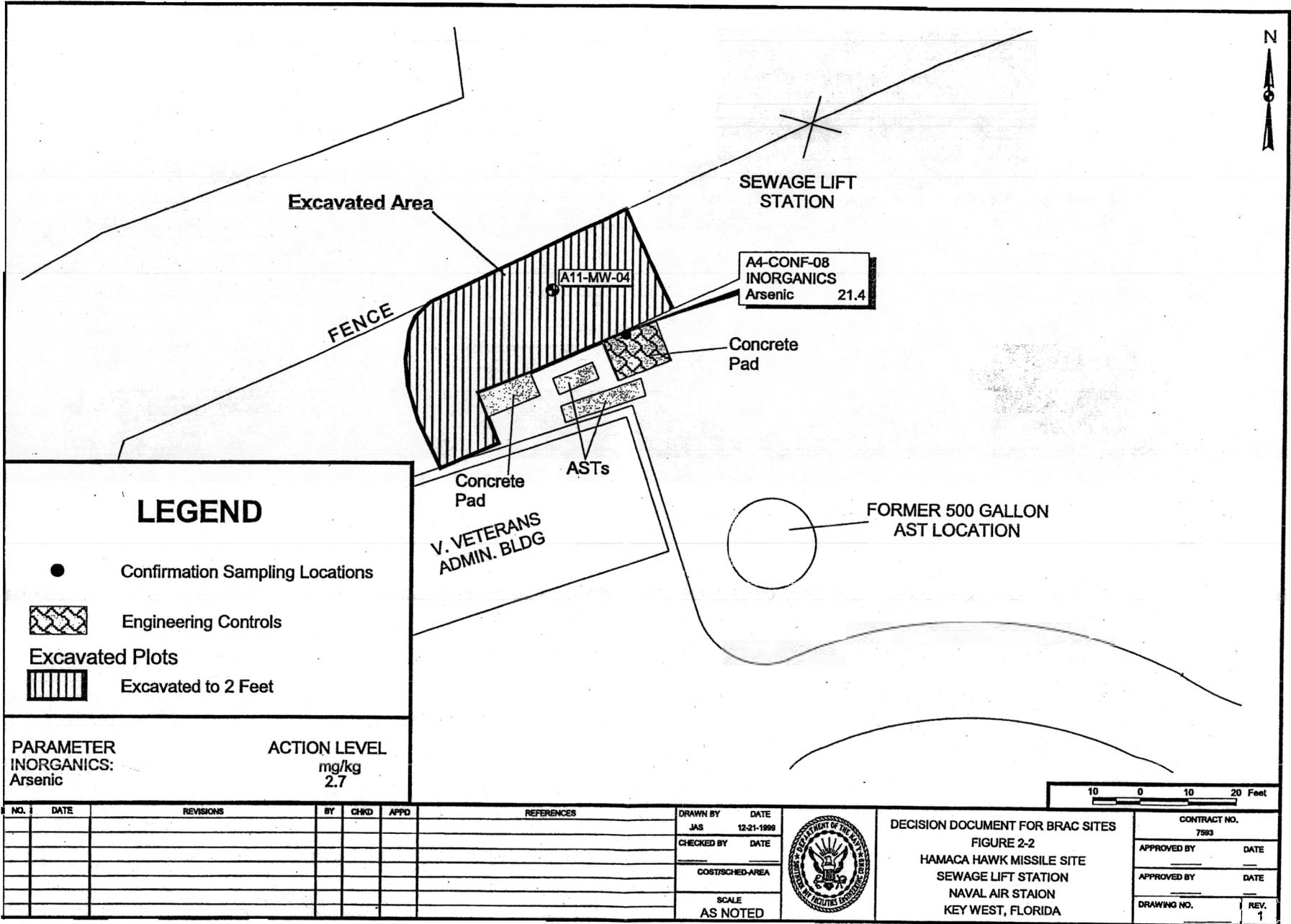
ITEM NO.	CATEGORY CODE	FACILITY (Category description)	NO. OF UNITS	TYPE	UNIT OF MEAS.	TOTAL QUANTITY	COST	DRAWING NUMBERS	REMARKS
17	18	19	20	21	22	23	24	25	26
TRANSFER OF 0.82 ACRES ± OF LAND IN FEE INCLUDING 0.05 ^{0.22} ± ACRES NON EXCLUSIVE USE INGRESS/EGRESS EASEMENT AND IMPROVEMENTS FROM THE DEPARTMENT OF NAVY TO UNITED STATES DEPARTMENT OF TRANSPORTATION, FEDERAL AVIATION ADMINISTRATION.									
1		LAND PARCEL		FEE	AC	0.82			NOTES: THE FOLLOWING EXHIBITS ARE ATTACHED HERETO TO DESCRIBE THE LAND & FACILITIES BEING TRANSFERRED TO THE DEPARTMENT OF TRANSPORTATION, FEDERAL AVIATION ADMINISTRATION. EXHIBIT "A" - EBS EXHIBIT "B" - SURVEY MAP W/LEGAL DESCRIPTION EXHIBIT "C" - EASEMENT EXHIBIT "D" - ACQUISITION MAP U.S. ARMY DRUG NO. RE-3020 EXHIBIT "E" - PROPERTY RECORDS
2		<u>BUILDINGS:</u>							
		I-6501		FEE	SF	39	\$ 1,819		
		I-6504		FEE	SF	2910	\$ 54,714		
		I-6505		FEE	SF	63	\$ 6,497		
		I-6506		FEE	N/A	---	\$ 1,905		
		I-6507		FEE	N/A	---	\$ 635		
		I-6508		FEE	SF	63	\$ 8,295		
				TOTAL		3075	\$ 73,865		

27. STATEMENT OF COMPLETION: The facilities listed hereon are in accordance with maps, drawings, and specifications and change orders approved by the authorized representative of the using agency except for the deficiencies listed on the reverse side.		28. ACCEPTED BY (Signature) 		DATE 10/20/99
TRANSFERRED BY (Signature) 		TITLE (Post Engr./Dese Civ. Engr./Navy Rep.) Manager, Acquisition & Real Estate Branch		29. PROPERTY VOUCHER NUMBER
EARL G. BAHAM HEAD, LAND MANAGEMENT DEPARTMENT		10-14-99		

AIK-00-0083

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CTO 0032



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Rev. 3
5/25/00