

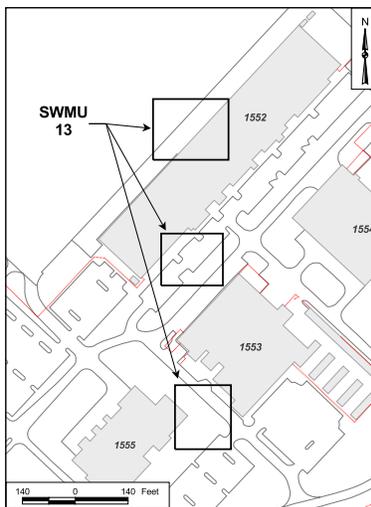
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FINAL STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 13 OLD FIRE
FIGHTING TRAINING AREA NS MAYPORT FL
8/8/2008
NAVAL STATION MAYPORT

STATEMENT OF BASIS
SWMU 13 – Old Firefighting Training Area
Naval Station Mayport
Mayport, Florida
USEPA ID #FL9 170 024 260



August 8, 2008



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

SUMMARY

The proposed corrective action at **Solid Waste Management Unit (SWMU) 13** at Naval Station (NAVSTA) Mayport is No Action. SWMU 13 was impacted by former firefighting training activities. Though SWMU 13 was disturbed during the construction of Buildings 1552 and 1553 and pipeline installations, the **Corrective Measures Study (CMS)** concluded that corrective action is not required and No Action is recommended at SWMU 13. The SWMU is currently covered by the above mentioned buildings and asphalt or concrete parking lots.

The public is invited to comment on this proposed corrective action or any other alternatives including those not previously studied. More 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 the **Resource Conservation and Recovery Act (RCRA)** as amended by the 1984 **Hazardous and Solid Waste Amendments (HSWA)**, the **Florida Department of Environmental Protection (FDEP)** issued the current HSWA permit to NAVSTA Mayport on August 30, 2005.

This **Statement of Basis (SB)** identifies the proposed No Action corrective action for SWMU 13, explains the related rationale, solicits public review and comment on this decision, and provides information as to how the public can be involved in the decision process. Additional details regarding the facility, the environmental investigations, and the evaluation of the No Action decision may be found in the **RCRA Facility Investigation (RFI)** and CMS Reports. 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 No Action **corrective measure** reflected in this SB is proposed by the United States Navy (Navy) for implementation at SWMU 13. Changes to the proposed No Action corrective measures or a change from the proposed No Action corrective measures to another appropriate solution will require public participation.

PROPOSED CORRECTIVE ACTION

The proposed corrective action at SWMU 13 at 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). SWMU 13, the Old Firefighting Training Area, is located in the central part of the NAVSTA Mayport (see Figure 2). The site is located near Buildings 1552 and 1553 (see Figure 3).

The SWMU consists of three distinct areas used for fire fighting training exercises between 1972 and 1983. The training areas were surrounded by earthen berms constructed on top of an abandoned asphalt runway. The interior of the berms were partially filled with two-thirds water and one third flammable material that was ignited during training exercises. Flammable materials used included aviation fuel, waste oil, and solvents. Flammable material not consumed during the training exercises were left in the berm and either infiltrated, evaporated, or allowed to drain through the earthen berms toward the runway. The SWMU area is currently covered by buildings and asphalt or concrete parking lots.

Figure 1. Naval Station Mayport Location Map



Figure 2. SWMU 13 Location Map

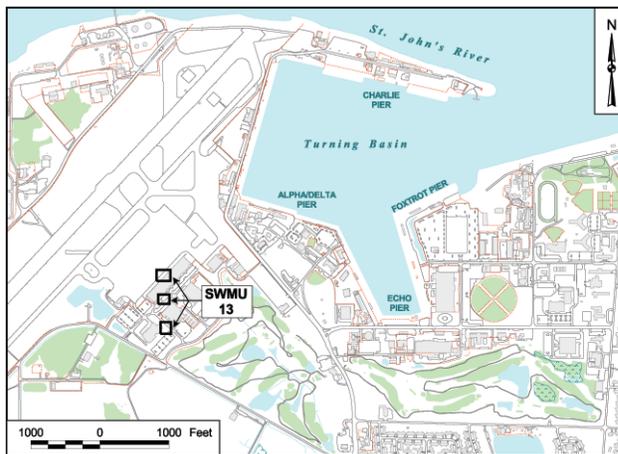
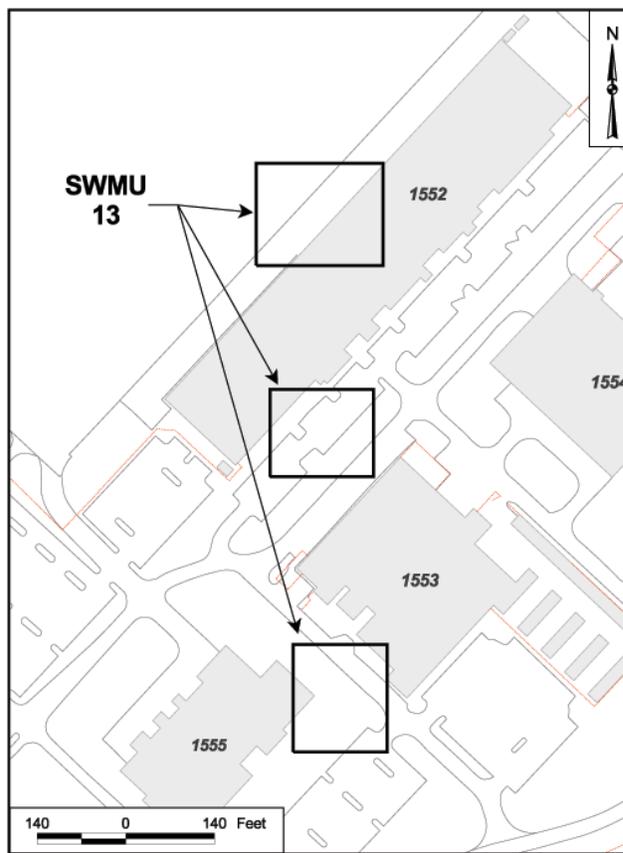


Figure 3. SWMU 13 Site Map



During the 1992 and 1994 RFI field activities at SWMU 13, sediment (considered to be **surface soils** due to the dryness at the time of collection), **subsurface soil**, and **groundwater** samples were obtained. The RFI concluded there were no soil analytes detected in excess of risk-based or regulatory criteria. However, antimony, iron, and manganese were detected in the groundwater beneath SWMU 13 at concentrations that exceeded regulatory criteria.

Confirmatory sampling was conducted on groundwater samples at SWMU 13 in 2002 and 2003. The purpose of the confirmatory sampling was to identify current concentrations of groundwater constituents that were reported to exceed regulatory criteria in the RFI for SWMU 13. Iron and manganese were detected in the groundwater exceeding regulatory criteria during the confirmation sampling. The results of the confirmatory sampling were included in the CMS. As explained in the CMS, the detected iron and manganese concentrations were determined not to be related to activities at the former firefighting training exercises that were conducted at SWMU 13.

SUMMARY OF FACILITY RISKS

A **Human Health Baseline Risk Assessment** was performed as part of the RFI Report. Ecological risks were also assessed in the CMS for SWMU 13. An exceedance of a FDEP or **United States Environmental Protection Agency** (USEPA) risk level indicates a potential concern for the SWMU.

Human Health Baseline Risk Assessment

Preliminary risk characterization for SWMU 13 was conducted for potential exposures to surface soil, subsurface soil, and groundwater under current and future land-use scenarios. Samples initially collected as sediment samples were evaluated as surface soil samples due to the dryness of the ditch at the time of collection.

Surface Soil. No analytes were detected at concentrations exceeding residential screening values. Therefore, no human health risks were identified.

Subsurface Soil. Results of the subsurface soil assessment did not indicate the presence of any analytes greater than the FDEP residential soil cleanup target levels (SCTLs).

Groundwater. Three inorganics (antimony, iron, and manganese) were initially detected in the groundwater. Confirmation sampling confirmed that only iron and manganese were present in groundwater in excess of regulatory criteria. However, these inorganics were detected in both an upgradient and a cross-gradient monitoring well during confirmation sampling of SWMU 13. Therefore, iron and manganese were concluded not to have been associated with former firefighting training exercises performed at the SWMU and were not selected as **chemicals of concern** (COCs).

Ecological Assessment

Based on the RFI findings, SWMU 13 does not constitute a suitable ecological habitat because the areas are entirely comprised of asphalt surfaces and buildings. No risk to terrestrial wildlife populations was determined to be likely due to exposure to surface soil. Additionally, the RFI found groundwater discharge into St. Johns River did not pose a risk to aquatic receptors including fish, amphibians, plants, and invertebrates.

Conclusions

Based on the results of the RFI, risk assessments, confirmatory sampling, and CMS conducted at SWMU 13, there are no chemical constituents present in the surface soil, subsurface soil, and groundwater at SWMU 13 that would adversely impact human health or ecological receptors.

SCOPE OF THE CORRECTIVE ACTION

No contaminants in soil exceeded the residential SCTLs in Chapter 62-777 *Florida Administrative Code* (FAC). No contaminants in groundwater exceeded the groundwater cleanup target levels (GCTLs) in Chapter 62-777, FAC. Therefore, No Action is recommended.

SUMMARY OF ALTERNATIVES

Based on the CMS findings showing no contaminants exceeded residential SCTLs or GCTLs, corrective action is not required and No Action is recommended at SWMU 13.

EVALUATION OF THE PROPOSED REMEDY AND ALTERNATIVES

No proposed corrective actions or alternatives were evaluated for SWMU 13 because No Action is recommended for this SWMU.

PUBLIC PARTICIPATION

To make a final decision and incorporate a No Action corrective measure into the HSWA permit, the FDEP is soliciting public review and comment on this SB for the proposed corrective action for SWMU 13 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 August 24, 2008, and will be published in the *Florida Times Union* newspaper.

Copies of the RFI and CMS reports 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, FL, 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 Diane Racine or John Winters (contact information provided below).

All comments must be postmarked no later than October 7, 2008.

Next Steps

Unless otherwise indicated, the FDEP will modify the HSWA permit to incorporate the final decision on the RCRA permit modification request when the permit is renewed. The final selection will detail the No Action corrective measure chosen for SWMU 13 and will consider comments received during the **public comment period** in a **Response to Comments Summary**.

When the permit is modified, 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. 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 Code of Federal Regulations (CFR) 124.19. If no comments are received requesting a change in the draft permit, the final permit modification shall become effective immediately upon issuance.

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KEY WORDS

CFR	Code of Federal Regulations
COC	Chemical of Concern
CMS	Corrective Measures Study
FAC	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
GCTL	Groundwater Cleanup Target Level
HSWA	Hazardous and Solid Waste Amendments
NAVSTA	Naval Station
Navy	United States Navy
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SB	Statement of Basis
SCTL	Soil Cleanup Target Level
SWMU	Solid Waste Management Unit
USEPA	United States Environmental Protection Agency

GLOSSARY

Chemical of Concern (COC): a chemical detected in soil or groundwater at a concentration that may adversely affect human health or ecological receptors.

Corrective Measure: The actual construction or cleanup phase following the selection of cleanup alternatives.

Corrective Measures Study (CMS): An engineering analysis and report that identifies, evaluates, and compares the most appropriate technical approaches for addressing contamination at a site.

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 site cleanup.

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 at a hazardous waste site.

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 site poses to human health and the environment.

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.

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

Surface Soil: soil from zero to two feet below land surface.

Subsurface Soil: soil two feet below land surface and deeper.

United States Environmental Protection Agency (USEPA): The Federal agency responsible for implementing United States environmental laws enacted by Congress.

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**Comments on the Statement of Basis for the
Old Firefighting Training Area (SWMU 13)**

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