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FINAL CORRECTIVE MEASURES IMPLEMENTATION PLAN FOR SOLID WASTE
MANAGEMENT UNIT 26 NS MAYPORT FL
3/6/2014
TETRA TECH



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Document Tracking Number 14JAX0070

March 6, 2014

Project Number 112G00436

Naval Facilities Engineering Command, Southeast
ATTN: Mr. Dana Hayworth (OPC 6)
Remedial Project Manager
135 Ajax Street North
Naval Air Station Jacksonville
Jacksonville, FL 32212-0030

Reference: CLEAN IV Contract Number N62467-04-D-0055
Contract Task Order Number 0033

Subject: Final Corrective Measures Implementation Plan for Solid Waste Management Unit 26,
Naval Station Mayport, Jacksonville, Florida

Dear Mr. Hayworth:

Tetra Tech is pleased to submit the final Corrective Measures Implementation Plan for Solid Waste Management Unit 26 at Naval Station (NAVSTA) Mayport, Jacksonville, Florida that was prepared for the United States Navy, Naval Facilities Engineering Command Southeast under CTO 0033 for the Comprehensive Long-term Environmental Action Navy (CLEAN) IV Contract Number N62467-04-D-0055.

If you have any questions with regard to this submittal, please do not hesitate to contact me by telephone at (904) 730-4669, extension 215, or via e-mail at Gregory.Roof@tetrattech.com.

Sincerely,



Gregory S. Roof
Project Manager

GSR/lc

Enclosure

c: John Winters, FDEP (electronic only)
Paul Malewicki, NAVSTA Mayport (1 hardcopy, 1 CD)
John King, Resolution Consultants (electronic only)
Debra Humbert, Tetra Tech (Letter only)
RDM, Tetra Tech (1 unbound, 1 CD)
CTO 0033 Project File

Tetra Tech, Inc.

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**NAVAL STATION MAYPORT
CORRECTIVE MEASURES IMPLEMENTATION PLAN
SOLID WASTE MANAGEMENT UNIT 26, LANDFILL C
FACILITY IDENTIFICATION NUMBER FL9 170 024 260**

1. OBJECTIVE

A Resource Conservation and Recovery Act (RCRA) Statement of Basis (SB) for Solid Waste Management Unit (SWMU) 26, Landfill C, completed public comment requirements in April 2014. The SB stipulated the implementation of land use controls (LUCs), maintenance of existing soil cover, and site monitoring to prevent unacceptable human health risks from exposure to subsurface landfill debris at SWMU 26. The objective of this Corrective Measures Implementation Plan (CMIP) is to communicate the requirements to implement, maintain, and monitor the corrective measures selected for SWMU 26.

The Florida Department of Environmental Protection (FDEP) issued the current Hazardous and Solid Waste Amendments (HSWA) permit to Naval Station (NAVSTA) Mayport on August 17, 2009, pursuant to RCRA, as amended by HSWA. The HSWA permit requires the CMIP to include identification of the LUC objectives.

The requirements set forth in this CMIP shall supersede the requirements of the LUC Memorandum of Agreement signed on September 7, 1999, by the Navy, the United States Environmental Protection Agency, and the FDEP. The inspections and reporting requirements described herein will be effective immediately upon approval of this CMIP by the FDEP. The requirements set forth in this document, once put into effect, will remain applicable to SWMU 26 during Navy ownership, as well as subsequent ownership of the SWMU. The Navy may amend these requirements with FDEP concurrence.

2. SWMU DESCRIPTION

SWMU 26, Landfill C, is located in the central portion of NAVSTA Mayport (see Figure 1 in Attachment 1). SWMU 26 (Landfill C) was used as a one-time trench-and-fill disposal site in 1963. The trench was approximately 100 feet long by 20 feet wide and 8 feet below ground surface. The trench was filled with scrap metal and construction debris transported to NAVSTA Mayport from the Green Cove Springs Naval Facility. The trenches excavated at the landfill site intersected the water table, and materials were placed below the water table. The trenches were then covered with soil. No hazardous wastes were disposed at the site.

The Group II RCRA Facility Assessment Sampling Visit Report (RFA-SV) and Corrective Measures Study (CMS) for SWMU 26 were submitted to the FDEP in August 1995 and June 2013, respectively. The RFA-SV concluded that no contaminants exceeded FDEP Cleanup Target Levels or NAVSTA Mayport background levels for soil or groundwater; however, buried wastes are still present at SWMU 26. Corrective measures recommended for addressing the buried wastes presented in the CMS and selected in the SB are LUCs and site monitoring. LUCs are in place to prevent human contact with contaminated soil and landfill debris by limiting activities at the site and restricting use of and access to SWMU 26.

The landfill LUC area covers approximately 1.5 acres (see Figure 2 in Attachment 1). The Navy plans to continue to use SWMU 26 for industrial operations.

3. **CORRECTIVE MEASURES**

a. Engineering Controls: None proposed.

b. Institutional Controls: The following are the corrective measures for the LUC corrective action to be implemented at SWMU 26 to address buried wastes:

1. Prohibit the excavation and uncontrolled removal of soil/sediment unless prior written approval is obtained from the FDEP.
2. Prevent exposure to groundwater underlying SWMU 26 including, but not limited to dewatering, irrigation, heating/cooling purposes, and industrial processes, unless prior written approval is obtained from the FDEP.
3. Restrict the site to nonresidential use only. Nonresidential land use restrictions prohibit residential or residential-like uses including, but not limited to, any form of housing; childcare facilities; any kind of school including preschools, elementary schools, and secondary schools; playgrounds; and adult convalescent and nursing care facilities.
4. Maintain the integrity of any existing or future monitoring or remediation system(s).

c. Monitoring: The following monitoring of the corrective measures will be implemented at SWMUs 26:

1. Physical inspections of SWMU 26 will be conducted by the Navy annually to ensure that the implemented LUCs are being maintained.

4. **CORRECTIVE ACTION IMPLEMENTATION**

The following implementation plan shall be executed by the Navy to ensure that the corrective measures for SWMU 26 are met and maintained:

a. CMIP Distribution: The CMIP will be placed in the Information Repository within 30 days of receiving FDEP approval. The Information Repository is located at the Jacksonville Public Library – Beaches Branch, 600 3rd Street, Neptune Beach, Florida, 32266, (904) 241-1141.

b. Implementing Corrective Actions: LUCs are the only planned corrective action for this site. The LUCs will be implemented by NAVSTA Mayport upon approval of the CMIP.

c. SWMU Inspections: Upon the FDEP's approval of this CMIP, the Navy will conduct annual physical inspections of SWMU 26 to confirm compliance with the corrective measures. Any activity inconsistent with the corrective measures objectives or use

- restrictions, or any other action that may interfere with the effectiveness of the corrective measures, will be addressed by the Navy upon discovery, and the FDEP will be notified per NAVSTA Mayport's RCRA permit. Groundwater monitoring may be required once these inconsistent activities have been corrected.
- d. Compliance Reporting:** Upon the FDEP's approval of this CMIP, the Navy will provide to the FDEP an annual Corrective Measures Compliance Certificate (consistent with Attachment 2) after the inspection of SWMU 26 has been completed. In addition, should any deficiencies be discovered during the annual inspection, the Navy will provide the FDEP with a written description of the deficiencies and the measures that are proposed to correct the deficiencies per NAVSTA Mayport's RCRA permit.
 - e. Remedy Reviews:** Although remedy reviews are not required under RCRA, the Navy will conduct periodic reviews of the corrective measures at SWMU 26 to ensure that the corrective measures remain protective of human health and the environment.
 - f. Notice of Planned Property Conveyances:** Although the Navy may later transfer these procedural responsibilities to another party by contract, property transfer agreement, or through other means, the Navy shall retain ultimate responsibility for corrective measures integrity. In the event of any conveyance of the SWMU 26 property to any other agency, person, or entity, the Navy shall provide notice to the FDEP of such intended conveyance at least 6 months prior to the conveyance. If it is not possible for the Navy to notify the FDEP at least 6 months prior to the conveyance, then the Navy will notify FDEP as soon as possible, but no later than 60 days prior to the conveyance. The notice shall describe the mechanism for maintenance of corrective measures and the responsible party. In the event of a property transfer, the Navy and FDEP shall have the opportunity to review the intended deed restrictions.
 - g. Changes and Termination of Corrective Measures:** The Navy shall not modify or terminate corrective measures, implementation actions, or modify land use without approval by the FDEP. The Navy shall seek prior FDEP concurrence before any anticipated action that may disrupt the effectiveness of the corrective measures or any action that may alter or negate the need for corrective measures. When the Navy determines, with the FDEP concurrence, that one or more of the corrective measures at SWMU 26 are no longer needed for protection of human health and the environment, the Navy shall complete the appropriate documentation.

5. POINTS OF CONTACT

Listed below is the point-of-contact information for the Navy and FDEP.

Navy

Paul Malewicki
Environmental Division
Public Works Office
Naval Station Mayport
Jacksonville, FL 32228-0067
(904) 270-3188
Paul.G.Malewicki@navy.mil

FDEP

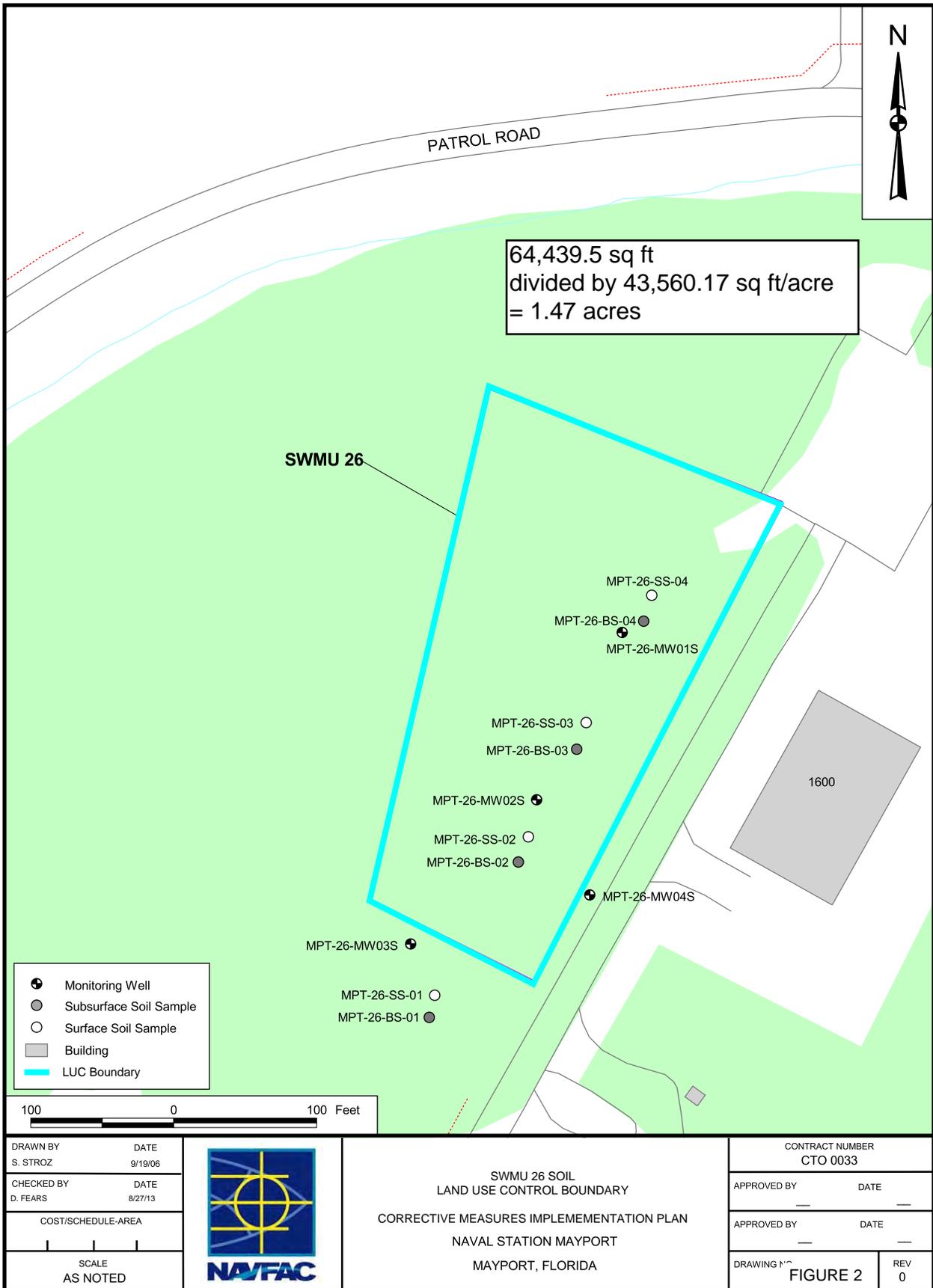
John Winters (MS 4535)
FDEP, Bob Martinez Center
Bureau of Waste Cleanup
Federal Programs Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(850) 245-8999 or Fax (850) 245-7690
John.Winters@dep.state.fl.us

6. REFERENCES

Tetra Tech, Inc., 2013. Corrective Measure Study for Solid Waste Management Units 19, 26, 28, and 56, Naval Station Mayport, Jacksonville, Florida. June.

Tetra Tech, Inc., 2013. Statement of Basis for SWMU 26 – Landfill C, Naval Station Mayport, Jacksonville, Florida, November.

ATTACHMENT 1
FIGURES



ATTACHMENT 2
ANNUAL CORRECTIVE MEASURES COMPLIANCE CERTIFICATE

SWMU 26

ANNUAL CORRECTIVE MEASURE COMPLIANCE CERTIFICATE

Naval Station Mayport
 Facility I.D. No.: FL9 170 024 260

SWMU and LUC boundaries are shown on the Attachments in the CMIP for SWMU 26.

This evaluation covers the period from **1 January through 31 December** _____. Form shall be submitted by **1 March** of the year following the reporting period.

CERTIFICATION CHECKLIST

	IN COMPLIANCE	NON- COMPLIANCE	SEE COMMENT	NOT APPLICABLE
1) No residential development or use on parcel including but not limited to, any form of housing, child-care facilities, pre-schools, elementary schools, secondary schools, playgrounds, or full-time adult convalescent or nursing care facilities. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) No excavation of the cap or uncontrolled removal/ disturbance of soil/sediment exceeding FDEP Direct Residential Exposure SCTLs (unless Previously approved by FDEP and the Navy). <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) No digging into or disturbance of any concrete or asphalt covered areas (unless previously approved by the FDEP and the Navy). <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) No human consumption of groundwater. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SWMU 26

	IN COMPLIANCE	NON- COMPLIANCE	SEE COMMENT	NOT APPLICABLE
5) No groundwater usage. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) No tampering or damage to any Navy monitoring or remediation systems. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7) Periodic assessments addressing MNA and contaminant migration <u>are</u> occurring reports summarizing the findings of each monitoring event and annual analytical results <u>are</u> being submitted to the Navy and the FDEP. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I, the undersigned, hereby certify that I am an authorized representative of the above named property owner and that the above described remedies and controls have been complied with for the period noted. Alternately, any known deficiency(ies) and the owner's completed or planned actions to address such deficiency(ies) are described in the attached page explaining the deficiency(ies).

Signature/Printed Name

Date

Mail completed form(s) to:

Chief, RCRA Programs Branch
U.S. Environmental Protection
Agency Region IV
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104

Florida Dept of Environmental Protection
Bob Martinez Building
Bureau of Waste Cleanup Federal
Facilities Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Commanding Officer
NAVFAC SE
Attn: Director, Environmental
Services Business Line
PO Box 30
Jacksonville, FL 32212-0030